



Biological Resources Technical Report

68 Willow Road Project

Menlo Park, San Mateo County, California



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August 2024
Revised October 2025

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List of Acronyms

APN	Accessor's Parcel Number
BGEPA	Bald and Golden Eagle Protection Act
BRTR	Biological Resources Technical Report
CCC	California Coastal Commission
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
County	County of San Mateo
Corps	U.S. Army Corps of Engineers
CRLF	California Red Legged Frog
CSRL	California Soils Resource Lab
CWA	Clean Water Act
EFH	Essential Fish Habitat
EPA	U.S. Environmental Protection Agency
ESA	Federal Endangered Species Act
Magnuson-Stevens Act	Magnuson-Stevens Fishery Conservation & Management Act
MBTA	Migratory Bird Treaty Act
NCCP	Natural Community Conservation Plan
NETR	National Environmental Title Research
NMFS	National Marine Fisheries Service
NWI	National Wetland Inventory
NWPL	National Wetland Plant List
OHWM	Ordinary High Water Mark
Rank	California Rare Plant Ranks
SC	State Candidate
SSC	Species of Special Concern
TOB	Top of Bank
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WBWG	Western Bat Working Group
WRA	WRA, Inc.



1.0 INTRODUCTION

This Biological Resources Technical Report (BRTR) evaluates existing biological resources, potential impacts, and avoidance measures (if required) for the 68 Willow Road Project located in Menlo Park, San Mateo County, California (Project Site; Appendix A – Figure 1). The proposed project (Project) involves the construction of 50 Townhome style units configured in eight total 3-story buildings.

1.1 Overview and Purpose

This BRTR provides an assessment of biological resources within the Project Site and immediate vicinity. The assessment included preliminary mapping of potential jurisdictional aquatic resources. The purpose of the assessment was to develop and gather information on sensitive land cover types and special-status plant and wildlife species to support an evaluation of the Project under the California Environmental Quality Act (CEQA). This report describes the results of the site visit, which assessed the Project Site for (1) the presence of sensitive land cover types, special-status plant species, and special-status wildlife species, (2) the potential for the site to support special-status plant and wildlife species. Based on the results of the site assessment, potential impacts to sensitive land cover types and special-status species resulting from the proposed project were evaluated. If the project has the potential to result in impacts to these biological resources, measures to avoid or minimize for those impacts are described.

A biological resources assessment provides general information on the presence, or potential presence, of sensitive species and habitats. Additional focused studies (such as protocol level species surveys or a formal wetland delineation) may be required to support regulatory permit applications or to implement avoidance measures included in this report. This assessment is based on information available at the time of the study and on-site conditions that were observed on the dates the site was visited. Conclusions are based on currently available information used in combination with the professional judgement of the biologists completing this study.

1.2 Project Description and Recommended Project Features

The proposed Project will involve the redevelopment an existing structure to create a new residential development comprised of eight (8) 3-story buildings that provide a total of 50 townhome style units (Appendix D). The buildings will be arranged with front doors facing the adjacent streets and neighboring parcels. The site is designed with a simple loop road that maintains usable open space in the central area along with the open space along San Francisquito Creek. Overall, the Project has been designed to avoid the adjacent creek and maintain the functions and value of surrounding natural habitats. In accordance with the ConnectMenlo General Plan and M-2 Area Zoning Update, the Project will incorporate the following recommendations as components of the Project to further protect sensitive communities, aquatic resources, and special-status species that may occur along the creek corridor:

Sensitive Natural Communities and Aquatic Resources

No Project impacts will occur below the top-of-bank (TOB) and no riparian trees will be removed. Although some Project elements will be located beneath the riparian canopy, any impervious surfaces below the riparian canopy will be restricted to the prior development

envelope. Permeable surfaces below the riparian canopy (i.e. open cell pavers, walking trails of decomposed granite) will be placed to avoid significant impacts to the root zone of riparian trees. In addition, prior to ground disturbing activities, aquatic resources adjacent to Project construction areas will be flagged and appropriate erosion control measures (i.e., silt fencing, straw wattles) will be installed in the areas adjacent to jurisdictional waters. Erosion control measures will be installed with oversight from a qualified biologist.

Roosting Bats

Building demolition and tree removal will occur outside the bat maternity season (defined as April 1 through August 31). If tree removal and building demolition must occur between April 1 and August 31, prior to the removal of trees or buildings, a bat habitat assessment will be performed by a qualified biologist for potential maternity roost sites prior to March 15 and no more than 60 days prior to the anticipated start of construction/demolition. If a tree or building has no potential to support roosting bats (e.g., no sufficient interstitial spaces, large basal cavities, exfoliating bark, interstitial spaces, or suitable foliage), tree removal and building demolition can proceed with no further measures required to protect roosting bats.

If potential roosting sites are identified, the qualified biologist will determine if the roost is active either through direct observation (e.g., using a bore scope to investigate the spaces in a building or tree) or through an emergence survey. If the potential roost is confirmed inactive, the tree or building can be removed with no further avoidance. If the roost is active and work is occurring outside of the maternity season, the qualified biologist will make recommendations for bat exclusion or other actions that will make the sites unsuitable for roosting. Methods will include but are not limited to the following:

- For buildings, passive exclusion of bats could involve building modification (e.g., cutting holes in the roof or walls to circulate air) or the installation one-way doors on egress points to allow bats to vacate the building but prevent them from re-entering.
- For trees, a two-phased cutting method may be implemented with oversight from a qualified biologist.

Regardless of time of year, any trees felled will be allowed to remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any bats to escape.

Nesting Birds

To the extent feasible, Project-related activities will be avoided during the nesting bird season, generally defined as February 1 – August 31. If Project work must occur during the nesting bird season, a pre-construction nesting bird survey will be conducted by a qualified biologist within 7 days of ground disturbance or vegetation removal to avoid disturbance to active nests, eggs, and/or young of nesting birds. Surveys will be conducted in all potential nesting habitat located within, and adjacent to, Project work sites and in staging and storage areas.

If an active nest is located, a no disturbance buffer will be established around the nest. Active nest sites and protective buffer zones will be designated as “Environmentally Sensitive Areas” where no Project-related activities or personnel may enter until a qualified biologist determines that the young have fully fledged, or the nest otherwise becomes inactive (e.g., due to predation), and will no longer be adversely affected by the Project. Suggested buffer zone distances differ depending on species, existing conditions, and nest placement and will be determined and implemented in the field by a qualified biologist.

Bird Friendly Building Design

The Project design incorporates bird safe measures in accordance with requirements outlined in the Menlo Park Municipal Code Chapter 16.30(05): Bird-Friendly Design. Based on the plan set by SDG Architects, Inc. (August 2025), the total amount of glazing (i.e., glass) proposed is relatively low and bird safe measures (i.e. insect screens) will be applied to all operable windows and glazed door locations. Overall, less than 10% of each building façade will feature non-bird-friendly glazing, which is only sparsely present at front and rear building elevations (approximately 1 to 4% of façade area). No transparent building corners, glass guardrails, free standing glass walls, or glass walkways are proposed at any building elevation. Furthermore, building exteriors will utilize a combination of various colors, textures and patterns (e.g. stone veneer, multi-colored board and batten siding, stucco) which will break up the exterior of the buildings visually (creating “visual noise”), and increase the likelihood that flying birds will perceive buildings as a solid surface.

All exterior lighting will be kept to a minimum and will include down-facing fixtures that will prevent light trespass into adjacent habitats. All lighting will utilize shields such that no bulb is visible and to ensure that the light is directed to the ground surface. No flood lights will be used unless required for safety or security purposes. No rodenticides will be allowed.

1.3 Summary of Results

The Project is intentionally sited to avoid the adjacent intermittent stream, San Francisquito Creek. Some Project elements will be located beneath the riparian canopy; however, any impervious surfaces below the riparian canopy will be restricted to the prior development envelope only, or pervious surfaces with no significant impacts to the root zone of riparian trees. No Project impacts will occur below the TOB.

No special-status plant species have potential to occur on the Project Site. However, seven (7) special-status wildlife species have potential to occur in the immediate vicinity of or in portions of the Project Site: hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), white-tailed kite (*Elanus leucurus*), San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), western pond turtle (*Actinemys marmorata*, WPT), California red-legged frog (*Rana draytonii*, CRLF), and steelhead - Central California Coast DPS (*Oncorhynchus mykiss irideus*). In addition, native non-special-status birds and bats with baseline legal protections have the potential to occur in the immediate Project vicinity. Based on the Project elements described in Section 1.2, the Project has been designed to avoid impacts to these species.

Table 1, below, shows the correlation between relevant regulations and each Biological Resources question in the Environmental Checklist Form (Appendix G) of the CEQA guidelines.

Table 1. Summary of Biological Resources Evaluation

CEQA Assessment Category ¹ IV – Biological Resources	Biological Resources Considered	Relevant Laws & Regulations	Responsible Regulatory Agency	Summary of Findings & Report Section ²
Question A. Special-status Species	Special-status Plants Special-status Wildlife Designated Critical Habitat	Federal Endangered Species Act CA Endangered Species Act CA Native Plant Protection Act Migratory Bird Treaty Act Bald & Golden Eagle Protection Act	U.S. Fish & Wildlife Service National Marine Fisheries Service CA Department of Fish & Wildlife	Project elements have been incorporated into the design and adequately address potential impacts. See Section 6.0 for more information.
Question B. Sensitive natural communities & riparian habitat	Sensitive Natural Communities Streams, Lakes & Riparian Habitat	CA Fish & Game Code Oak Woodland Conservation Act Porter-Cologne Act Clean Water Act	CA Department of Fish & Wildlife U.S. Army Corps of Engineers U.S. Environmental Protection Agency State Water Resources Control Board Regional Water Quality Control Board	Project elements have been incorporated into the design and adequately address potential impacts. See Section 6.0 for more information.
Question C. State and federally protected wetlands	Wetlands Unvegetated surface waters	Clean Water Act: Sections 404/401 Rivers & Harbors Act: Section 10 Porter-Cologne Act	U.S. Army Corps of Engineers U.S. Environmental Protection Agency State Water Resources Control Board Regional Water Quality Control Board	Project elements have been incorporated into the design and adequately address potential impacts. See Section 6.0 for more information.

¹ CEQA Questions have been summarized here, see Section 6.0 for details.

² As given in this report, see Section 6.0 subheadings.

Table 1. Summary of Biological Resources Evaluation

CEQA Assessment Category ¹ IV – Biological Resources	Biological Resources Considered	Relevant Laws & Regulations	Responsible Regulatory Agency	Summary of Findings & Report Section ²
<p>Question D. Fish & Wildlife corridors</p>	<p>Essential Fish Habitat Wildlife Corridors</p>	<p>CA Fish & Game Code Magnuson-Stevens Fishery Conservation & Management Act</p>	<p>CA Department of Fish and Wildlife National Marine Fisheries Service</p>	<p>Project elements have been incorporated into the design and adequately address potential impacts. See Section 6.0 for more information</p>
<p>Question E. Local policies</p>	<p>Protected Trees Coastal zone resources Other biological protections</p>	<p>Local Tree Ordinance General Plan (e.g. Stream & Wetland Setbacks) Local ordinances</p>	<p>Local and regional agencies CA Coastal Commission San Francisco Bay Conservation and Development Commission</p>	<p>Project elements have been incorporated into the design and adequately address potential impacts. See Section 6.0 for more information</p>
<p>Question F. Local, state, federal conservation plans</p>	<p>Habitat Conservation Plans Natural Community Conservation Plans</p>	<p>Federal Endangered Species Act Natural Community Conservation Planning Act</p>	<p>U.S. Fish and Wildlife Service CA Department of Fish and Wildlife</p>	<p>Potentially significant impacts were not identified. See Section 6.0 for more information</p>



2.0 REGULATORY BACKGROUND

The following sections explain the regulatory context of the biological assessment, including applicable laws and regulations that were applied to the field investigations and analysis of potential project impacts.

2.1 Federal and State Regulatory Setting

2.1.1 Vegetation and Aquatic Communities

CEQA provides protections for particular vegetation types defined as sensitive by the California Department of Fish and Wildlife (CDFW) and aquatic features protected by laws and regulations administered by the U.S Army Corps of Engineers (Corps), State Water Resources Control Board (SWRCB), and Regional Water Quality Control Boards (RWQCB). The laws and regulations that provide protection for these resources are summarized below.

Sensitive Natural Communities: Sensitive natural communities include habitats that fulfill special functions or have special values. Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by the CDFW. CDFW ranks sensitive communities as "threatened" or "very threatened" (CDFW 2021a) and keeps records of their occurrences in its California Natural Diversity Database (CNDDDB; CDFW 2021b). Natural communities are ranked 1 through 5 in the CNDDDB based on NatureServe's (2020) methodology, with those communities ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified in local or regional plans, policies, or regulations or those identified by the CDFW or U.S. Fish and Wildlife Service (USFWS) must be considered and evaluated under CEQA (California Code of Regulations [CCR] Title 14, Div. 6, Chap. 3, Appendix G). In addition, this general class includes oak woodlands that are protected by local ordinances under the Oak Woodlands Protection Act and Section 21083.4 of California Public Resources Code (CPRC).

Waters of the United States, Including Wetlands: The Corps regulates "Waters of the United States" under Section 404 of the Clean Water Act (CWA). Waters of the United States are defined in the Code of Federal Regulations (CFR) as including the territorial seas, and waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, such as tributaries, lakes and ponds, impoundments of waters of the U.S., and wetlands that are hydrologically connected with these navigable features (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands as defined in the *U.S. Army Corps of Engineers Wetlands Delineation Manual* (Corps Manual; Environmental Laboratory 1987), are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Unvegetated waters including lakes, rivers, and streams may also be subject to Section 404 jurisdiction and are characterized by an ordinary high water mark (OHWM) identified based on field indicators such as the lack of vegetation, sorting of sediments, and other indicators of flowing or standing water. The placement of fill material into Waters of the United States generally requires a permit from the Corps under Section 404 of the CWA.

The Corps also regulates construction in navigable waterways of the U.S. through Section 10 of the Rivers and Harbors Act (RHA) of 1899 (33 U.S. Code [USC] 403). Section 10 of the RHA requires Corps approval and a permit for excavation or fill, or alteration or modification of the course, location, condition, or capacity of, any port, roadstead, haven, harbor, canal, lake, harbor

or refuge, or enclosure within the limits of any breakwater, or of the channel of any navigable water of the United States. Section 10 requirements apply only to navigable waters themselves, and are not applicable to tributaries, adjacent wetlands, and similar aquatic features not capable of supporting interstate commerce.

Waters of the State, Including Wetlands: The term “Waters of the State” is defined by the Porter-Cologne Act as “any surface water or groundwater, including saline waters, within the boundaries of the state.” The SWRCB and nine RWQCB protect waters within this broad regulatory scope through many different regulatory programs. Waters of the State in the context of a CEQA Biological Resources evaluation include wetlands and other surface waters protected by the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (SWRCB 2019). The SWRCB and RWQCB issue permits for the discharge of fill material into surface waters through the State Water Quality Certification Program, which fulfills requirements of Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. Projects that require a Clean Water Act permit are also required to obtain a Water Quality Certification. If a project does not require a federal permit but does involve discharge of dredge or fill material into surface waters of the State, the SWRCB and RWQCB may issue a permit in the form of Waste Discharge Requirements.

Sections 1600-1616 of California Fish and Game Code: Streams and lakes, as habitat for fish and wildlife species, are regulated by CDFW under Sections 1600-1616 of California Fish and Game Code (CFGC). 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 CCR as “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 [including] watercourses having a surface or subsurface flow that supports or has supported riparian vegetation” (14 CCR 1.72). 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 vegetation has been 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). Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFW.

2.1.2 Special-status Species

Endangered and Threatened Plants, Fish, and Wildlife. Specific species of plants, fish, and wildlife species may be designated as threatened or endangered by the federal Endangered Species Act (ESA), or the California Endangered Species Act (CESA). Specific protections and permitting mechanisms for these species differ under each of these acts, and a species’ designation under one law does not automatically provide protection under the other.

The ESA (16 USC 1531 et seq.) is implemented by the USFWS and the National Marine Fisheries Service (NMFS). The USFWS and NMFS maintain lists of endangered and threatened plant and animal species (referred to as “listed species”). “Proposed” or “candidate” species are those that are being considered for listing and are not protected until they are formally listed as threatened or endangered. Under the ESA, authorization must be obtained from the USFWS or NMFS prior to take of any listed species. “Take” under the ESA is defined as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Take under

the ESA includes direct injury or mortality to individuals, disruptions in normal behavioral patterns resulting from factors such as noise and visual disturbance and impacts to habitat for listed species. Actions that may result in take of an ESA-listed species may obtain a permit under ESA Section 10, or via the interagency consultation described in ESA Section 7. Federal-listed plant species are only protected when removal or destruction occurs on federal land; however, if a federal agency authorizes, funds, or carries out an action, that agency must insure through Section 7 consultation that the action is not likely to jeopardize the continued existence of the species.

The ESA also provides for designation of critical habitat, which are specific geographic areas containing physical or biological features “essential to the conservation of the species.” Protections afforded to designated critical habitat apply only to actions that are funded, permitted, or carried out by federal agencies. Critical habitat designations do not affect activities by private landowners if there is no other federal agency involvement.

The CESA (CFGF 2050 et seq.) prohibits the take of any plant and animal species that the CFGC determines to be an endangered or threatened species in California. CESA regulations include take protection for threatened and endangered plants on private lands, as well as extending this protection to candidate species that are proposed for listing as threatened or endangered under CESA. The definition of a "take" under CESA ("hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") only applies to direct impact to individuals, and does not extend to habitat impacts or harassment. CDFW may issue an Incidental Take Permit under CESA to authorize take if it is incidental to otherwise lawful activity and if specific criteria are met. Take of these species is also authorized if the geographic area is covered by a Natural Community Conservation Plan (NCCP), as long as the NCCP covers that activity. CDFW may also authorize take for voluntary restoration projects through the Restoration Management Permit (RMP).

Fully Protected Species and Designated Rare Plant Species. This category includes specific plant and wildlife species that are designated in the CFGC as protected even if not listed under CESA or ESA. Fully Protected Species includes specific lists of birds, mammals, reptiles, amphibians, and fish designated in CFGC. Fully protected species may not be taken or possessed at any time. No licenses or permits may be issued for take of fully protected species, except for necessary scientific research and conservation purposes. The definition of "take" is the same under the California Fish and Game Code and the CESA. By law, CDFW may not issue an Incidental Take Permit for Fully Protected Species. Under the California Native Plant Protection Act (NPPA), CDFW has listed 64 “rare” or “endangered” plant species, and prevents “take,” with few exceptions, of these species. CDFW may authorize take of species protected by the NPPA through the Incidental Take Permit process, or under a NCCP. CDFW may also authorize take for voluntary restoration projects through the Restoration Management Permit (RMP).

Special Protections for Nesting Birds and Bats. The federal Bald and Golden Eagle Protection Act provides relatively broad protections to both of North America’s eagle species [bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila chrysaetos*)] that in some regards are similar to those provided by the ESA. In addition to regulations for special-status species, most native birds in the United States, including non-status species, have baseline legal protections under the Migratory Bird Treaty Act of 1918 and CFGC, i.e., sections 3503, 3503.5 and 3513. Under these laws/codes, the intentional harm or collection of adult birds as well as the intentional collection or destruction of active nests, eggs, and young is illegal. For bat species,

the Western Bat Working Group (WBWG) designates conservation status for species of bats, and those with a high or medium-high priority are typically given special consideration under CEQA.

Essential Fish Habitat. The Magnuson-Stevens Fishery Conservation and Management Act provides for conservation and management of fishery resources in the U.S., administered by NMFS. This Act establishes a national program intended to prevent overfishing, rebuild overfished stocks, ensure conservation, and facilitate long-term protection through the establishment of Essential Fish Habitat (EFH). EFH consists of aquatic areas that contain habitat essential to the long-term survival and health of fisheries, which may include the water column, certain bottom types, vegetation (e.g., eelgrass (*Zostera* spp.)), or complex structures such as oyster beds. Any federal agency that authorizes, funds, or undertakes action that may adversely affect EFH is required to consult with NMFS.

Species of Special Concern, Movement Corridors, and Other Special-status Species under CEQA. A Species of Special Concern (SSC) is a species formally designated by the CDFW which meets one or more criteria related to a Federal ESA status (if it is not listed under CESA), including extirpation from California, documented population declines, or small population size within California and risk of declines. In addition, CDFW has developed a special animals list as “a general term that refers to all of the taxa the CNDDDB is interested in tracking, regardless of their legal or protection status.” This list includes lists developed by other organizations, including for example, the Audubon Watch List Species, the Bureau of Land Management Sensitive Species, and USFWS Birds of Conservation Concern. Plant species on the California Native Plant Society (CNPS) Rare Plant Inventory (Inventory; CNPS 2024) 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. Additionally, any species listed as sensitive within local plans, policies and ordinances are likewise considered sensitive. Movement and migratory corridors for native wildlife (including aquatic corridors) as well as wildlife nursery sites are given special consideration under CEQA.

2.2 Local Plans and Policies

City of Menlo Park General Plan. The City of Menlo Park General Plan contains policies pertaining to the following biological resources categories:

- San Francisquito Creek (Policy OSC1.7)
- Sensitive habitat communities (Policies OSC1.3, OSC1.4, OSC1.5)
- Heritage Trees (Policy OSC1.15)

City of Menlo Park Tree Ordinance. The City of Menlo Park Tree Ordinance (Chapter 13.24) requires a permit prior to the removal or major pruning of a “heritage tree” within any parcel of property in the City. Any work performed within an area 10 times the diameter of the tree (i.e., the tree protection zone) requires the submittal of a tree protection plan for approval by the City before issuance of any permit for grading or construction (Menlo Park 2024). The Ordinance defines a “heritage tree” as:

- Any tree other than oaks has a trunk with a circumference of 47.1 inches (diameter of 15 inches) or more, measured at 54 inches above natural grade;

- Any oak tree native to California has a trunk with a circumference of 31.4 inches (diameter of 10 inches) or more measured at 54 inches above natural grade; or
- A tree or group of trees specifically designated by the City Council for protection because of its historical significance, special character or community benefit.

The City of Menlo Park requires replacement trees for the removal of heritage trees as a condition of approval for a tree permit, and/or the payment of a heritage tree in-lieu fee. Commercial applicants are required to provide replacement heritage trees on site in an amount equivalent to the appraised value of the removed heritage tree or pay the difference in value to the City’s heritage tree fund (Menlo Park 2024).

City of Menlo Park Bird Safe Ordinance

The City of Menlo Park Municipal Code Chapter 16.30(5) (hereafter “Bird Safe Ordinance”) contains the following bird-friendly design standards, the goal of which is to reduce the likelihood of bird strikes and night lighting impacts:

- A. No more than ten percent (10%) of facade surface area shall have non-bird-friendly glazing.
- B. Bird-friendly glazing includes, but is not limited to, opaque glass, covering the outside surface of clear glass with patterns, paned glass with fenestration, frit or etching patterns, and external screens over non-reflective glass. Highly reflective glass is not permitted.
- C. Occupancy sensors or other switch control devices shall be installed on nonemergency lights and shall be programmed to shut off during nonwork hours and between ten (10) p.m. and sunrise.
- D. Placement of buildings shall avoid the potential funneling of flight paths towards a building facade.
- E. Glass skyways or walkways, freestanding (see-through) glass walls and handrails, and transparent building corners shall not be allowed.
- F. Transparent glass shall not be allowed at the rooflines of buildings, including in conjunction with roof decks, patios and green roofs.
- G. Use of rodenticides shall not be allowed.

A project may receive a waiver from one (1) or more of the items listed above, subject to the submittal of a site-specific evaluation from a qualified biologist and review and approval by the planning commission. (Ord. 1105 § 2 (Exh. A § 1), 2023).

San Francisquito Creek Bank Stabilization and Revegetation Master Plan (SFCBSRMP). The SFCBSRMP is a guidance document “intended to assist agencies and landowners’ consultants in the planning, conceptual design and permitting of San Francisquito Creek stabilization and revegetation projects” (San Francisquito Creek Joint Powers Authority 2013). The SFCBSRMP includes guidance on special-status plant and wildlife species with potential to occur within and in the immediate vicinity of San Francisquito Creek, as well as guidance on weed management and revegetation planning, fisheries management, and wildlife protection for San Francisquito Creek Projects.

City of Menlo Park General Plan Mitigation Monitoring and Reporting Program

On November 29, 2016, the City Council certified the ConnectMenlo Environmental Impact Report and approved the General Plan Land Use and Circulation Elements. The ConnectMenlo General

Plan and M-2 Area Zoning Update has been a multi-year comprehensive process that represents a vision for a live/work/play environment in the M-2 Area while maintaining the character and values that the City has embraced. While primarily focused on the area formerly known as the M-2 district, the General Plan serves as the City's comprehensive and long range guide to land use and infrastructure development in the City.

The City Environmental Impact Report (ConnectMenlo) identifies mitigation measures pertaining to biological resources. All development projects in the City are required to implement these measures as Standard Conditions of Approval.

Impact BIO-1: Impacts to special-status species or the inadvertent loss of bird nests in active use, which would conflict with the federal Migratory Bird Treaty Act and California Fish and Game Code could occur as a result of new development potential in the Bayfront Area and from existing and ongoing development potential in the remainder of the city if adequate controls are not implemented.

Mitigation Measure BIO-1: Prior to individual project approval, the City shall require project applicants to prepare and submit project-specific baseline biological resources assessments on sites containing natural habitat with features such as mature and native trees or unused structures that could support special-status species and other sensitive biological resources, and common birds protected under Migratory Bird Treaty Act (MBTA). The baseline biological resources assessment shall be prepared by a qualified biologist. The biological resource assessment shall provide a determination on whether any sensitive biological resources are present on the property, including jurisdictional wetlands and waters, essential habitat for special-status species, and sensitive natural communities. If sensitive biological resources are determined to be present, appropriate measures, such as preconstruction surveys, establishing no-disturbance zones during construction, and applying bird-safe building design practices and materials, shall be developed by the qualified biologist to provide adequate avoidance or compensatory mitigation if avoidance is infeasible. Where jurisdictional waters or federally and/or State-listed special-status species would be affected, appropriate authorizations shall be obtained by the project applicant, and evidence of such authorization provided to the City prior to issuance of grading or other construction permits. An independent peer review of the adequacy of the biological resource assessment may be required as part of the CEQA review of the project, if necessary, to confirm its adequacy.

3.0 ASSESSMENT METHODOLOGY

On April 24 and July 10, 2024, WRA, Inc. (WRA) biologists visited the Project Site to map vegetation, aquatic features, and other land cover types; document plant and wildlife species present; and evaluate on-site habitat for the potential to support special-status species as defined by CEQA. Prior to the site visits, WRA biologists reviewed literature resources and performed database searches to assess the potential for sensitive land cover types and special-status species, including:

- Web Soil Survey (USDA 2024)
- Palo Alto 7.5-minute U.S. Geological Survey (USGS) quadrangle (USGS 2024)
- Contemporary aerial photographs (Google Earth 2024)
- Historical aerial photographs (NETR 2024)
- National Wetlands Inventory (USFWS 2024a)
- California Aquatic Resources Inventory (SFEI 2024)
- CNDDDB (CDFW 2024b)
- CNPS Inventory (CNPS 2024)
- Consortium of California Herbaria (CCH1 2021, CCH2 2024)
- USFWS Information for Planning and Consultation (USFWS 2024b)
- eBird Online Database (Cornell Lab of Ornithology 2024)
- California Bird Species of Special Concern in California (Shuford and Gardali 2008)
- California Amphibian and Reptile Species of Special Concern (Thomson et al. 2016)
- A Field Guide to Western Reptiles and Amphibians (Stebbins 2003)
- A Manual of California Vegetation, Online Edition (CNPS 2024)
- California Natural Community List (CDFW 2024a)
- Database searches (i.e., CNDDDB, CNPS) for special-status species focused on the Palo Alto, San Mateo, Redwood Point, Newark, Woodside, Mountain View, La Honda, Mindego Hill, and Cupertino USGS 7.5-minute quadrangles.

Following the remote assessment, WRA biologists completed a field review to document: (1) land cover types (e.g., vegetation communities, aquatic resources), (2) existing conditions and to determine if such provide suitable habitat for any special-status plant or wildlife species, (3) if and what type of aquatic land cover types (e.g., wetlands) are present, and (4) if special-status species are present

3.1 Vegetation Communities and Other Land Cover Types

During the site visits, WRA evaluated the species composition and area occupied by distinct vegetation communities, aquatic communities, and other land cover types. Mapping of these classifications utilized a combination of aerial imagery and ground surveys. In most instances, communities are characterized and mapped based on distinct shifts in plant assemblage (vegetation) and follow the California Natural Community List (CDFW 2024a) and A Manual of

California Vegetation, Online Edition (CNPS 2024). These resources cannot anticipate every component of every potential vegetation assemblage in California, and so in some cases, it is necessary to identify other appropriate vegetative classifications based on best professional judgment of WRA biologists. When undescribed variants are used, it is noted in the description. Vegetation alliances (natural communities) with a CDFW Rank of 1 through 3 (globally critically imperiled [S1/G1], imperiled [S2/G2], or vulnerable [S3/G3]) (CDFW 2024a), were evaluated as sensitive as part of this evaluation.

The site was reviewed for the presence of wetlands and other aquatic resources according to the methods described in the Corps Manual (Environmental Laboratory 1987), the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West (Corps 2008)*, and A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States (Lichvar and McColley 2008). Areas meeting these indicators were mapped as aquatic resources and categorized using the vegetation community classification methods described above. Aquatic communities which are mapped in the NMFS EFH Mapper (NMFS 2024) or otherwise meet criteria for designation as EFH are indicated as such in the community description below in Section 5.1. The presence of riparian habitat was evaluated based on woody plant species meeting the definition of riparian provided in *A Field Guide to Lake and Streambed Alteration Agreements, Section 1600-1607, California Fish and Game Code* (CDFG 1994) and based on best professional judgement of biologists completing the field surveys.

3.2 Special-status Species

3.2.1 General Assessment

Potential occurrence of special-status species in the Project Site was evaluated by first determining which special-status species occur in the vicinity of the Project Site through a literature and database review as described above. Presence of suitable habitat for special-status species was evaluated during the site visits based on physical and biological conditions of the site as well as the professional expertise of the investigating biologists. The potential for each special-status species to occur in the Project Site was then determined according to the following criteria:

- **No Potential.** Habitat on and adjacent to the site is clearly unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).
- **Unlikely.** Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.
- **Moderate Potential.** Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.
- **High Potential.** All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.
- **Present.** Species is observed on the site or has been recorded (i.e., CNDDDB, other reports) on the site in the recent past.



If a more thorough assessment was deemed necessary, a targeted or protocol-level assessment or survey was conducted or recommended as a future study. If a special-status species was observed during the site visit, its presence was recorded and discussed below in Section 5.2. If designated critical habitat is present for a species, the extent of critical habitat present and an evaluation of critical habitat elements is provided as part of the species discussions below.

3.2.2 Special-status Plants and Wildlife

No targeted or protocol-level surveys for special-status plant or wildlife species have been conducted to date.

3.3 Wildlife Corridors and Native Wildlife Nursery Sites

To account for potential impacts to wildlife movement/migratory corridors, biologists reviewed maps from the California Essential Connectivity Project (CalTrans 2010), and habitat connectivity data available through the CDFW Biogeographic Information and Observation System (CDFW 2024). Additionally, aerial imagery (Google Earth 2024) for the local area was referenced to assess if local core habitat areas were present within, or connected to the Project Site. This assessment was refined based on observations of on-site physical and/or biological conditions, including topographic and vegetative factors that can facilitate wildlife movement, as well as on-site and off-site barriers to connectivity.

The potential presence of native wildlife nursery sites is evaluated as part of the site visit and discussion of individual wildlife species below. Examples of native wildlife nursery sites include nesting sites for native bird species (particularly colonial nesting sites), marine mammal pupping sites, and colonial roosting sites for other species (such as for monarch butterfly [*Danaus plexippus*]).



4.0 ECOLOGICAL SETTING

The approximately 3-acre Project Site is located in the City of Menlo Park, San Mateo County, California. The Project Site includes all areas affected by the Project, as well as the portions of the parcel outside of the Project footprint. San Francisquito Creek runs along the eastern border of the Project Site. Additional details of the local setting are below.

4.1 Soils and Topography

The overall topography of the Project Site is flat, with the exception of the steep banks along the Creek. Elevations range from approximately 60 to 120 feet above sea level. According to SoilWeb (CSRL 2024) and Web Soil Survey (USDA 2024), the Project Site is underlain by 3 soil mapping units: Urban land-Elpaloalto complex, 0 to 2 percent slopes (131scl), Urban land-Still complex, 0 to 2 percent slopes (130scl), and Urban land-Still complex, 0 to 2 percent slopes (130). Soils within the Project Site are shown in Appendix A – Figure 3. The parent soil series of all the Project Site’s mapping units are summarized below.

Elpaloalto Series: This series consists of very deep, well drained soils that formed in alluvium from mixed rock sources and is situated on floodplains and alluvial fans. These soils are well drained with moderate runoff and moderately slow permeability. They range from neutral to slightly acidic (CSRL 2024, USDA 2024). The Urban land-Elpaloalto complex, 0 to 2 percent slopes soil mapping unit is considered hydric (USDA 2024).

Still Series: This series consists of deep, well drained soils that formed in alluvial material from sedimentary rocks and is situated on flood plains and alluvial fans and have slopes of 0 to 30 percent. These soils are well drained with slow to medium runoff and moderately slow permeability. They range from slightly acidic to moderately alkaline (CSRL 2024, USDA 2024). The Urban land-Still complex, 0 to 2 percent slopes (130scl and 130) soil mapping units are not considered hydric (USDA 2024).

Hangerone Series: This series consists of very deep, poorly drained soils that formed in alluvium from mixed rock sources and is situated in basins. These soils are poorly drained with slow permeability. They range from moderately alkaline to strongly alkaline (CSRL 2024, USDA 2024). The Urban land-Elpaloalto complex, 0 to 2 percent slopes soil mapping unit is considered hydric (USDA 2024).

4.2 Climate and Hydrology

The Project Site is located in the southern metropolitan region of San Mateo County. The average monthly maximum temperature in the area is 69.3 degrees Fahrenheit, while the average monthly minimum temperature is 46.6 degrees Fahrenheit. Predominantly, precipitation falls as rainfall between November and March with an annual average precipitation of 15.2 inches.

The Project Site spans two local watersheds: the Cordileras Creek-Frontal San Francisco Bay Estuaries (HUC 12: 180500040902), which is within the regional San Francisco Bay watershed (HUC 8: 18050004); and the San Francisquito Creek (HUC 12: 180500030404), which is within the Coyote regional watershed (HUC 8: 18050003). The Project Site is located along the border of both watersheds, which follows the approximate path of San Francisquito Creek. There is one blue-line stream in the Project Site (USGS 2024), San Francisquito Creek (CARI; SFEI 2024). From

the Project Site, the Creek flows northeast for approximately 3.75 miles before reaching the San Francisco Bay. The San Francisco Bay is a Traditionally Navigable Water (TNW). Detailed descriptions of aquatic resources are provided in Section 5.1 below.

4.3 Land Use

The majority of the Project Site is developed, except for the riparian corridor adjacent to San Francisquito Creek. The Project Site is improved with a one-story, approximately 27,000 square foot office building. Developed areas include ornamental landscaping, office buildings, paved walkways, parking areas and manicured lawns (Appendix A – Figure 2). Detailed land cover type descriptions are included in Section 5.1 below, and all observed plant species are included in Appendix B. Surrounding land uses include urban commercial and single-family residential development (Google Earth 2024).

Low-intensity office uses border the Property to the north/northeast and south/southwest. The Linfield Oaks residential neighborhood is across Willow Road to the northwest/west. The east/southeast boundary is bordered by San Francisquito Creek. Across the Creek is the Downtown North neighborhood in the City of Palo Alto.



5.0 ASSESSMENT RESULTS

5.1 Vegetation Communities and Other Land Cover

WRA biologists observed three land cover types within the Project Site: developed areas, ornamental landscaping and riparian habitat. San Francisquito Creek occurs adjacent to the Project Site. Land cover types within the Project Site and adjacent to the Project Site are illustrated in **Appendix A – Figure 4**. The non-sensitive land cover types in the Project Site include developed areas and ornamental trees, while the sensitive communities include riparian habitat and San Francisquito Creek. The Project limits of disturbance have been intentionally designed to avoid San Francisquito Creek.

Table 2. Vegetation Communities and Other Land Cover Types

COMMUNITY / LAND COVERS	SENSITIVE STATUS	JURISDICTIONAL AGENCY	ACRES WITHIN PROJECT SITE
TERRESTRIAL / COMMUNITY LAND COVER			
Developed Areas	Not Sensitive	N/A	1.60
Ornamental Landscaping	Not Sensitive	N/A	0.59
Riparian Habitat	Sensitive	CDFW	0.31
AQUATIC RESOURCES			
Adjacent Intermittent Stream (San Francisquito Creek)	Sensitive	Corps, RWQCB, CDFW	0

5.1.1 Terrestrial Land Cover



Developed Areas (no vegetation alliance). CDFW Rank: None. The developed areas total 1.60 acres within the Project Site. The developed areas include buildings, paved walkways, parking lots, and manicured lawns. The Urban/Built-up NCLC type is synonymous with the developed areas (Thorne et al. 2004). This community is not considered sensitive by San Mateo County, CDFW, or any other regulatory entity. (See photo 1 to left.)

Photo 1. Typical developed area.

Ornamental Landscaping (no vegetation alliance). CDFW Rank:

None. Ornamental landscaping covers 0.59 acres within the Project Site. According to the Tree Survey Report, a total of 53 trees were identified onsite, 31 of which are protected under the provisions of the City of Menlo Park Heritage Tree Ordinance. Ornamental tree species include coast live oak (*Quercus agrifolia*), Douglas fir (*Pseudotsuga menziesii*), coast redwood (*Sequoia sempervirens*), privet (*Ligustrum* sp.), plum (*Prunus* sp.), poplar (*Populus* sp.), Deodar cedar (*Cedrus deodara*), Japanese maple (*Acer palmatum*), and Hawthorn (*Crataegus monogyna*), among others. Shrubs and other landscaping species include California lilac (*Ceanothus* sp.), rose (*Rosa* sp.), sage (*Salvia* sp.), wisteria (*Wisteria* sp.), oleander (*Nerium oleander*), calla lily (*Zantedeschia aethiopica*), western swordfern (*Polystichum munitum*), camellia (*Camellia japonica*), and agapanthus (*Agapanthus praecox*), among others. There are also extensive areas of manicured grass lawns. This land cover type is not considered sensitive by San Mateo County, CDFW, or any other regulatory entity. (See photo 2 to left.)



Photo 2. Typical ornamental trees.

There is ruderal (weedy) vegetation growing along the edges of the landscaping. Species that dominate this community include ripgut brome (*Bromus diandrus*), European ivy (*Hedera helix*), hedge parsley (*Torilis arvensis*), bull thistle (*Cirsium vulgare*), Himalayan blackberry (*Rubus armeniacus*), and California burclover (*Medicago polymorpha*), among others.



Photo 3. Typical riparian canopy.

Riparian Habitat (*Quercus agrifolia* woodland alliance). CDFW Rank: S4/G5. Riparian habitats are transitional areas between riverine wetlands and the surrounding uplands. Within the Project Site, riparian habitat is composed of the coast live oak riparian woodland alliance (*Quercus agrifolia* woodland alliance). The coast live oak riparian woodland is defined by the dominance of coast live oak in the tree layer (>50%-60% relative cover of coast live oak). Riparian habitat covers 0.31 acres of the Project Site and includes the outer dripline of trees which make up continuous canopy with individual trees overhanging San Francisquito Creek.

Within the Project Site, the coast live oak riparian woodland is dominated by coast live oak, with other native and non-native tree species intermixed within the canopy. Other common species in this land cover type include valley oak (*Quercus lobata*), California buckeye (*Aesculus californica*), bay laurel (*Umbellularia californica*), toyon (*Heteromeles arbutifolia*), and willows (*Salix* sp.). The creek edges and banks support poison oak (*Toxicodendron diversilobum*), vinca (*Vinca* sp.), poison-hemlock (*Conium maculatum*), stinging nettle (*Urtica dioica*), Miner's lettuce (*Claytonia perfoliate*), manroot (*Marah macrocarpa*), and California bee plant (*Scrophularia californica*), among others.

The coast live oak woodland alliance is not considered sensitive on its own. However, riparian habitats are regulated by the CDFW, and CDFW jurisdiction extends to the top-of-bank (TOB) or the edge of riparian canopy, whichever is greater.

5.1.2 Aquatic Resources

Adjacent Intermittent Stream (San Francisquito Creek, no vegetation alliance). CDFW Rank: Sensitive. Intermittent streams are linear features that have indicators of OHWM and within which water flows for a portion of the year, generally drying out during the driest time of the year. San Francisquito Creek is a blue-line intermittent stream which runs along the eastern border of the Project Site. Intermittent streams including the San Francisquito Creek are considered a sensitive community subject to the jurisdiction of the U.S. Army Corps of Engineers (Corps), the Regional Water Quality Control Board (RWQCB), and/or CDFW. Federal jurisdiction by the Corps and state jurisdiction by the RWQCB extends to the OHWM, and CDFW jurisdiction extends to the TOB or the edge of riparian canopy, whichever is greater (see Section 5.1.1).

5.2 Special-status Species

5.2.1 Special-status Plants

Based upon a review of the databases listed above, 69 special-status plant species have been documented in the Palo Alto and eight surrounding 7.5-minute USGS quadrangles (including San Mateo, Redwood Point, Newark, Woodside, Mountain View, La Honda, Mindogo Hill, and Cupertino quadrangles) (CDFW 2024a). Habitats within the Project Site were evaluated for their potential suitability to support these species, based on physical and biological conditions. All 68 species are unlikely or have no potential to occur for one or more of the following reasons:

- Hydrologic conditions (e.g., vernal pools, marshes and swamps) necessary to support the special-status plant species are not present in the Project Site;
- Edaphic (soil) conditions (e.g., volcanic tuff, serpentine) necessary to support the special-status plant species are not present in the Project Site;
- Associated natural communities (e.g., interior chaparral, tidal marsh) necessary to support the special-status plant species are not present in the Project Site;
- The Project Site is geographically isolated (e.g. below elevation range, well outside of documented occurrences) from the documented range of the special-status plant species;
- Land use history and contemporary management (e.g., grading, extensive development) has degraded the localized habitat necessary to support the special-status plant species.

No special-status plant species were observed during the April 24 and July 10, 2024 site assessments conducted by WRA biologists. The developed conditions at the Project Site preclude the presence of any habitats for rare plants.

5.2.2 Special-status Wildlife

No special-status wildlife species were observed within the Project Site or surrounding area during the April 2024 site assessment. Forty-seven (47) special-status wildlife species have been

documented to occur in the Palo Alto, San Mateo, Redwood Point, Newark, Woodside, Mountain View, La Honda, Mindego Hill, and Cupertino 7.5-minute USGS quadrangles (CDFW 2024a). Most of these species were determined to have no potential or are unlikely to occur within the Project Site due to the absence of suitable habitat features including the following:

- Vernal pools
- Perennial aquatic habitat (e.g. streams, rivers or ponds)
- Tidal marsh areas
- Old growth redwood or fir forest
- Serpentine soils to support host plants
- Sandy beaches or alkaline flats
- Presence of specific host plants
- Caves, mine shafts, or abandoned buildings

The absence of such habitat features eliminates components critical to the survival or movement of most special-status species found in the vicinity. For instance, given the Project Site's relative proximity to sensitive habitats on the San Francisco Bay, many species documented nearby are obligates to marine or tidal marsh habitats, which are not present on or in the immediate vicinity of the Project Site.

Seven (7) special-status species have potential to occur in the immediate vicinity of or in portions of the Project Site: hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), white-tailed kite (*Elanus leucurus*), San Francisco dusky-footed Woodrat (*Neotoma fuscipes annectens*), western pond turtle (*Actinemys marmorata*, WPT), California red-legged frog (*Rana draytonii*, CRLF), and Steelhead - Central California Coast DPS (*Oncorhynchus mykiss irideus*). These species are discussed in greater detail below.

California red-legged frog (*Rana draytonii*). Federal Threatened, CDFW Species of Special Concern. The California red-legged frog (CRLF) is the only native “pond frog” found throughout much of California. Suitable aquatic breeding habitat is characterized by deep and still or slow-moving water associated with emergent marsh and/or riparian vegetation, typically with at least 20 weeks of continuous inundation (USFWS 2010). Suitable features include ponds (perennial and non-), streams/creeks, seasonal wetlands, springs, seeps, man-made features (e.g. stock ponds, roadside ditches), marshes, dune ponds, and lagoons. Dependent upon local conditions, CRLF may complete its entire life cycle in a particular habitat patch (e.g., a perennial pond suitable for all life stages), or utilize multiple habitat types. In aquatic features that dry down seasonally, CRLFs often undergo aestivation (a period of inactivity) during the dry months, retreating to small mammal burrows or other substrates that provide suitable refugia (Thomson et al. 2016). Adults and sub-adults (newly metamorphosed individuals) may disperse from breeding habitats to nearby riparian and/or aestivation areas in the summer. Conversely, during the rainy season CRLFs may migrate from aestivation sites to waters suitable for breeding. During such dispersals, frogs can travel over one mile over a variety of topographic and habitat types (Bulger et al. 2003). Upland dispersal habitats are variable and typically include riparian corridors, grasslands, and oak savannas.



San Francisquito Creek, an intermittent stream, does not provide suitable aquatic breeding habitat for CRLF. However, it may provide aquatic non-breeding habitat for this species during periods of flow. Adjacent developed and landscaped areas within the Project Site do not provide suitable upland dispersal habitat. No CRLF were observed during the site assessments in April or July of 2024, and no recent occurrences have been documented within 2 miles of the Project Site in CNDDDB (CDFW 2024b). However, CRLF is historically known to occur in San Francisquito Creek and this species was documented approximately 3.7 miles upstream from the Project Site in 2007. The nearest documented occurrence is within Lake Lagunita, approximately 2.25 miles southwest of the Project Site, but is presumed to be extirpated from this location. The Project Site is not within USFWS designated critical habitat for CRLF (CDFW 2024c). As such, CRLF is unlikely to occur within the Project Site.

Steelhead - Central California Coast DPS (*Oncorhynchus mykiss irideus*), Federal Threatened.

The Central California Coast DPS includes all naturally spawned populations of steelhead (and their progeny) in California streams from the Russian River to Aptos Creek, and the drainages of San Francisco and San Pablo Bays eastward to the Napa River (inclusive), excluding the Sacramento-San Joaquin River Basin. Steelhead typically migrate to marine waters after spending two years in freshwater, though they may stay up to seven. They then reside in marine waters for 2 or 3 years prior to returning to their natal stream to spawn as 4-or 5-year-olds. Steelhead adults typically spawn between December and June. In California, females typically spawn two times before they die. Preferred spawning habitat for steelhead is in perennial streams with cool to cold water temperatures, high dissolved oxygen levels and fast flowing water. Abundant riffle areas (shallow areas with gravel or cobble substrate) for spawning and deeper pools with sufficient riparian cover for rearing are necessary for successful breeding. According to the San Francisquito Creek Bank Stabilization and Revegetation Master Plan, steelhead are known to use the Creek as a migration corridor (San Francisquito Creek Joint Powers Authority 2023). No complete or significant barriers exist downstream of the reach adjacent to the Project Site (CDFW 2024d). As such, fish passage is not limited within this portion of the Creek. Multiple surveys over the years have identified both juvenile and adult steelhead throughout various locations on San Francisquito Creek (Leidy et al., 2005). Additionally, NMFS has designated San Francisquito Creek including the reach adjacent to the Project Site, as critical habitat for this species. The proposed project will not result in any adverse impacts to this Creek or critical habitat.

Western pond turtle (*Actinemys marmorata*), CDFW Species of Special Concern. The western pond turtle (WPT) is the only native freshwater turtle in California. This turtle is uncommon to common in suitable aquatic habitat throughout California, west of the Sierra-Cascade crest and Transverse Ranges. WPT inhabits annual and perennial aquatic habitats, such as coastal lagoons, lakes, ponds, marshes, rivers, and streams from sea level to 5,500 feet in elevation. Pond turtles also occupies man-made habitats such as stock ponds, wastewater storage, percolation ponds, canals, and reservoirs. This species requires low-flowing or stagnant freshwater aquatic habitat with suitable basking structures, including rocks, logs, algal mats, mud banks, and sand. Warm, shallow, nutrient-rich waters are ideal as they support prey items, which include aquatic invertebrates and occasionally fish, carrion, and vegetation. Turtles require suitable aquatic habitat for most of the year; however, WPT often occupies creeks, rivers, and coastal lagoons that become seasonally unsuitable. To escape periods of high water flow, high salinity, or prolonged dry conditions, WPT may move upstream and/or take refuge in vegetated, upland habitat for up to four months (Rathbun et al. 2002). Although upland habitat is utilized for refuging and nesting, this species preferentially utilizes aquatic and riparian corridors for

movement and dispersal.

WPT nests from late April through July. This species requires open, dry upland habitat with friable soils for nesting and prefers to nest on unshaded slopes within 15 to 330 feet of suitable aquatic habitat (Rathbun et al. 1992). Females venture from water for several hours in the late afternoon or evening during the nesting season to excavate a nest, lay eggs, and bury the eggs to incubate and protect them. Nests are well-concealed, though native mammals are occasionally able to locate and predate upon eggs. Hatchlings generally emerge in late fall but may overwinter in the nest and emerge in early spring of the following year. San Francisquito Creek provides potential aquatic habitat and basking habitat for this species adjacent to the Project Site, with upland refugia and nesting habitat provided by the vegetated creek banks; however, no suitable upland nesting habitat occurs within the Project Site.

White-tailed kite (*Elanus leucurus*), CDFW Fully Protected Species. The white-tailed kite is resident in open to semi-open habitats throughout the lower elevations of California, including grasslands, savannahs, woodlands, agricultural areas and wetlands. Vegetative structure and prey availability seem to be more important habitat elements than associations with specific plants or vegetative communities (Dunk 1995). Nests are constructed mostly of twigs and placed in trees, often at habitat edges. Nest trees are highly variable in size, structure, and immediate surroundings, ranging from shrubs to trees greater than 150 feet tall (Dunk 1995). White-tailed kites prey upon a variety of small mammals, as well as other vertebrates and invertebrates. Trees within the Project Site and along San Francisquito Creek may provide suitable nesting habitat for this species.

San Francisco Dusky-Footed Woodrat (*Neotoma fuscipes annectens*), CDFW Species of Special Concern. This subspecies occurs in brushy habitat in chaparral and foothills of woodlands around San Francisco Bay and the adjacent coastal ranges (Hafner et al. 1998). Woodrats often occupy habitats with both woodland and scrub components which provide cover and food sources, such as live oak, coffeeberry, blackberry, gooseberry, poison oak, and honeysuckle (Linsdale and Tevis 1951). Nests are typically over three feet in diameter and are constructed out of piled sticks, leaves, and grasses. The dense understory along San Francisquito Creek provides potential foraging, refugia, and nesting habitat for this species; however, no suitable habitat occurs within the Project Site.

Hoary bat (*Lasiurus cinereus*), WBWG Medium Priority. Hoary bats are highly associated with forested habitats in the western United States, particularly in the Pacific Northwest. They are a solitary species and roost primarily in foliage of both coniferous and deciduous trees, near the ends of branches, usually at the edge of a clearing. Roosts are typically 10 to 30 feet above the ground. They have also been documented roosting in caves, beneath rock ledges, in woodpecker holes, in grey squirrel nests, under driftwood, and clinging to the side of buildings, though this behavior is not typical. Hoary bats are thought to be highly migratory, however, wintering sites and migratory routes have not been well documented. This species tolerates a wide range of temperatures and has been captured at air temperatures between 0 and 22 degrees Celsius. Hoary bats probably mate in the fall, with delayed implantation leading to birth in May through July. They usually emerge late in the evening to forage, typically from just over one hour after sunset to after midnight. This species reportedly has a strong preference for moths, but is also known to eat beetles, flies, grasshoppers, termites, dragonflies, and wasps (WBWG 2015). Mature trees within the Project Site may provide potential bat roosting habitat for this species.

Pallid bat (*Antrozous pallidus*). CDFW Species of Special Concern, WBWG High Priority.

Moderate Potential. Pallid bats are distributed from southern British Columbia and Montana to central Mexico, and east to Texas, Oklahoma, and Kansas. This species occurs in a number of habitats ranging from rocky arid deserts to grasslands, and into higher elevation coniferous forests. Roosts are typically in rock crevices, tree hollows, mines, caves, and a variety of man-made structures, including vacant and occupied buildings. Tree roosting has been documented within snags and basal hollows of conifers, and within bole cavities in oak trees. Pallid bats are primarily insectivorous, feeding on large prey that is usually taken on the ground but sometimes in flight. Prey items include arthropods such as scorpions, ground crickets, and cicadas (WBWG 2017). Mature trees within the Project Site may contain cavities or snags suitable for roosting by this species.

5.3 Wildlife Corridors and Native Wildlife Nursery Sites

Wildlife movement between suitable habitat areas can occur via open space areas lacking substantial barriers. The terms “landscape linkage” and “wildlife corridor” are often used when referring to these areas. The key to a functioning corridor or linkage is that it connects two larger habitat blocks, also referred to as core habitat areas (Beier and Loe 1992; Soulé and Terbough 1999). It is useful to think of a “landscape linkage” as being valuable in a regional planning context, a broad scale mapping of natural habitat that functions to join two larger habitat blocks. The term “wildlife corridor” is useful in the context of smaller, local area planning, where wildlife movement may be facilitated by specific local biological habitats or passages and/or may be restricted by barriers to movement. Above all, wildlife corridors must link two areas of core habitat and should not direct wildlife to developed areas or areas that are otherwise void of core habitat (Hilty et al. 2019).

The Project Site is not within a designated wildlife corridor depicted in the Essential Connectivity Areas dataset published by CDFW, which provides baseline data on landscape-scale corridor areas (CalTrans 2012; CDFW 2024c). The site is located within a much larger tract of highly developed land and immediately borders residential and retail development. Therefore, the proposed Project would not significantly alter the current characteristics of the surrounding landscape nor disrupt wildlife movement between suitable habitat areas in the vicinity of the Project Site. While common wildlife species presumably utilize the site to some degree for movement at a local scale, the Project Site does not function as a true wildlife movement corridor within the area. The value of San Francisquito Creek as a wildlife movement corridor will remain unchanged following Project implementation.

5.4 Essential Fish Habitat

The Project Site is located within mapped Essential Fish Habitat (EFH) for Chinook Salmon and Coho Salmon. Essential Fish Habitat (EFH) is regulated by the National Marine Fisheries Service (NMFS), a division of the National Oceanic and Atmospheric Administration (NOAA). Protection of EFH is mandated under the 1996 Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act). The Magnuson-Stevens Act defines EFH as “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity” [16 USC 1802(10)]. EFH can include the water column, certain bottom types such as sandy or rocky bottoms, vegetation such as eelgrass or kelp, or structurally complex coral or oyster reefs. Under regulatory guidelines issued by NMFS, any federal agency that authorizes, funds, or undertakes

action that may affect EFH is required to consult with NMFS (50 CFR 600.920). EFH will not be affected by the proposed Project.

6.0 RECOMMENDATIONS

In order to implement ConnectMenlo General Plan and M-2 Area Zoning Update Mitigation Measure BIO-1, the following section summarizes Project elements that have been incorporated into the design and will ensure that the Project will not result in any impacts to sensitive species or resources.

6.1 Special-status Species

This section analyzes the Project's potential impacts to special-status species in reference to the significance threshold outlined in CEQA Appendix G, Part IV (a):

Does the project have the potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or U.S. Fish and Wildlife Service?

Recommendations that will be incorporated into the project design are discussed below.

6.1.1 Roosting Bats

This assessment determined that two species of special-status bat species, hoary bat and pallid bat, and non-status bat roosts protected under the CFGC may roost in large trees within the Project Site. As described in Section 1.2, the Project design will incorporate recommendations for roosting bats in accordance with Connect Menlo MM Bio-1. Project features to protect bats will ensure that the active roosts of special-status bat species are protected during building demolition and tree removal.

6.1.2 White-tailed Kite and General Nesting Birds

This assessment determined that one special-status bird species, white-tailed kite, may nest in trees within the Project Site or in the immediate vicinity. In addition, common raptors and native bird species protected under both the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) may also nest within the Project site or immediate vicinity.

As described in Section 1.2, the Project design will incorporate recommendations for special-status and native nesting birds in accordance with Connect Menlo MM Bio-1. Project features to protect nesting birds will ensure that the active nests of any special-status and common avian species are protected during grading activities and vegetation removal.

6.1.3 Western Pond Turtle

San Francisquito Creek may provide suitable aquatic habitat for WPT during periods of flow, and the banks may provide suitable nesting habitat for this species below TOB. As described above, the Project has been designed to avoid the Creek and no Project activities will occur below the TOB. Furthermore, the Project will incorporate erosion control measures into the design to prevent any incidental sediment discharge or erosion into the adjacent Creek (see Section 1.2).



6.1.4 California Red-Legged Frog

The Project Site does not provide suitable aquatic breeding habitat for CRLF, and suitable upland habitat is absent due to existing development immediately adjacent to the Creek. As described above, the Project has been designed to avoid the Creek and no Project activities will occur below the TOB. Furthermore, the Project will incorporate erosion control measures into the design to prevent any incidental sediment discharge or erosion into the adjacent Creek (see Section 1.2).

6.1.5 San Francisco Dusky-Footed Woodrat

San Francisco dusky-footed woodrat has potential to occur in riparian habitat along San Francisquito Creek. There are no proposed removals of riparian trees, and no Project impacts will occur on or below TOB.

6.1.6 Steelhead and Essential Fish Habitat

San Francisquito Creek is known to support steelhead, and the portion of the Creek within the Project Site is designated as critical habitat for the species by the USFWS. The Project Site is also located within mapped Essential Fish Habitat for Coho salmon and Chinook salmon. The Project has been designed to avoid San Francisquito Creek, and no Project activities will occur within the Creek channel (below the TOB). Therefore, water diversion and fish relocation will not be required. Furthermore, the Project will incorporate erosion control measures into the design to prevent any incidental sediment discharge or erosion into the adjacent Creek (see Section 1.2).

6.2 Sensitive Natural Communities and Land Cover Types

This section analyzes the Project's potential impacts on special-status species in reference to the following significance threshold:

b) Does the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or U.S. Fish and Wildlife Service;

Sensitive natural communities within the Project Site include the riparian habitat. (See Section 7.3 for sensitive aquatic resources, including the San Francisquito Creek). Impacts to riparian vegetation are under jurisdiction of CDFW per Section 1602 of the CFGC, and CDFW jurisdiction extends to the TOB or the edge of riparian dripline, whichever is greater.

The proposed Project was designed to avoid impacts to aquatic resources, as depicted in the Site Plan (**Appendix D**). There are no proposed removals of riparian trees, and no Project impacts will occur below the top-of-bank (TOB). Although some Project elements will be located beneath the riparian canopy, any impervious surfaces below the riparian canopy will be restricted to the prior development envelope. Permeable surfaces below the riparian canopy (i.e. open cell pavers, walking trails of decomposed granite) will be placed to avoid significant impacts to the root zone of riparian trees. **No impacts** to riparian vegetation are anticipated from the Project.

6.3 Aquatic Resources

This section analyzes the Project’s potential impacts to wetlands and other areas presumed or determined to be within the jurisdiction of the Corps or BCDC in reference to the significance threshold outlined in CEQA Appendix G, Part IV (c):

c) Does the Project have the potential to have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

Aquatic resources adjacent to the Project Site include one intermittent stream, San Francisquito Creek. **The proposed Project was designed to avoid impacts to aquatic resources**, as depicted in the Site Plan (**Appendix D**). No direct impacts to wetlands or jurisdictional waters are anticipated from the Project. In accordance with Connect Menlo MM Bio-1, the Project will incorporate erosion control measures into the design to prevent any incidental sediment discharge or erosion into the adjacent Creek (see Section 1.2).

6.4 Wildlife Corridors and Native Wildlife Nursery Sites

This section analyzes the Project’s potential impacts on habitat corridors and linkages in reference to the significance threshold outlined in CEQA Appendix G, Part IV (d):

d) Does the Project have the potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

While common wildlife species presumably utilize the site and adjacent creek to some degree for migration and movement at a local scale, the value of San Francisquito Creek for local wildlife movement will remain unchanged following development of the Project, as no Project activities or Project elements will occur below TOB. The development envelope itself does not provide any corridor functions beyond connecting similar land parcels in surrounding areas.

6.5 Local Policies and Ordinances

This section analyzes the Project’s potential impacts based on conflicts with local policies and ordinances in reference to the significance threshold outlined in CEQA Appendix G, Part IV (e):

e) Does the Project have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;

Local plans and policies related to biological resources examined in this analysis are:

- City of Menlo Park General Plan
- City of Menlo Park Heritage Tree Ordinance
- San Francisquito Creej Bank Stabilization and Revegetation Master Plan



6.5.1 City of Menlo Park General Plan

The Project has been intentionally designed to avoid impacts to San Francisquito Creek. The City of Menlo Park strongly discourages grading and construction activity within 50 feet of the existing top of creek bank (Menlo Park 2024). No Project impacts will occur on or below the top of-bank (TOB) of San Francisquito Creek. The Project is currently in the process of obtaining City approvals and will comply with negotiated City creek setbacks as determined through the City approvals process. The Project will therefore be consistent with the City of Menlo Park General Plan and Code regarding San Francisquito Creek (Policy OSC1.7), and **no impact** will occur related to these local policies.

6.5.2 City of Menlo Park Heritage Tree Ordinance

The City of Menlo Park Heritage Tree Ordinance requires a permit prior to the removal or major pruning of a “heritage tree” and requires the submittal of a tree protection plan prior to any work performed within an area 10 times the diameter of the tree (i.e. the tree protection zone). The Tree Ordinance also requires a tree protection plan prior to any work that will occur within 10 times the diameter of a Heritage tree (Section 13.24.030) (Menlo Park 2024a).

According to the Tree Survey Report prepared by Urban Tree Management, there are a total of 53 trees included in this report, 31 of which are protected under the provisions of the City of Menlo Park Heritage Tree Ordinance. Any proposed tree removal will be conducted in accordance with the City tree ordinance.

6.5.3 City of Menlo Park Bird Safe Ordinance

The City of Menlo Park Municipal Code Chapter 16.30(5) stipulates several measures and considerations related to bird friendly building design. The ordinance requires that no more than ten percent (10%) of facade surface area shall have non-bird-friendly glazing; prohibits the use of freestanding glass elements (i.e. skyways, guardrails, transparent building corners); limits night lighting practices; and requires that site plans consider flight paths.

As described in Section 1.2, the Project design incorporates bird safe measures in accordance with requirements outlined in the Bird Safe Ordinance. Less than 5% of each façade area will feature non-bird-friendly glazing, which is less than the 10% maximum allowance. The design avoids the use of the high-risk glass elements identified in the guidelines, incorporate various materials that create visual noise throughout the exterior, and will install insect screens on all operable windows and glazed doors. In addition, egress lighting will not exceed the minimum requirements for security purposes and all exterior lighting will utilize shields to ensure that the light is directed downwards and prevent light trespass. As such, the Project is consistent with the City Bird Safe Ordinance.

6.5.4 San Francisquito Creek Bank Stabilization and Revegetation Master Plan

The San Francisquito Creek Bank Stabilization and Revegetation Master Plan (SFCBSRMP) is a guidance document for bank stabilization and revegetation projects along the San Francisquito Creek, including the reach bordering the Project Site. The Project has been designed to avoid impacts to San Francisquito Creek, and no Project impacts will occur on or below the top-of-bank (TOB) of San Francisquito Creek.

6.6 Habitat Conservation Plans

This section analyzes the Project's potential impacts based on conflicts with any adopted local, regional, and state habitat conservation plans in reference to the significance threshold outlined in CEQA Appendix G, Part IV (f):

f) Does the Project have the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Project Site is not within the jurisdiction of an adopted Habitat Conservation Plan (HCP), NCCP, or other approved local, regional, or state habitat conservation plan.



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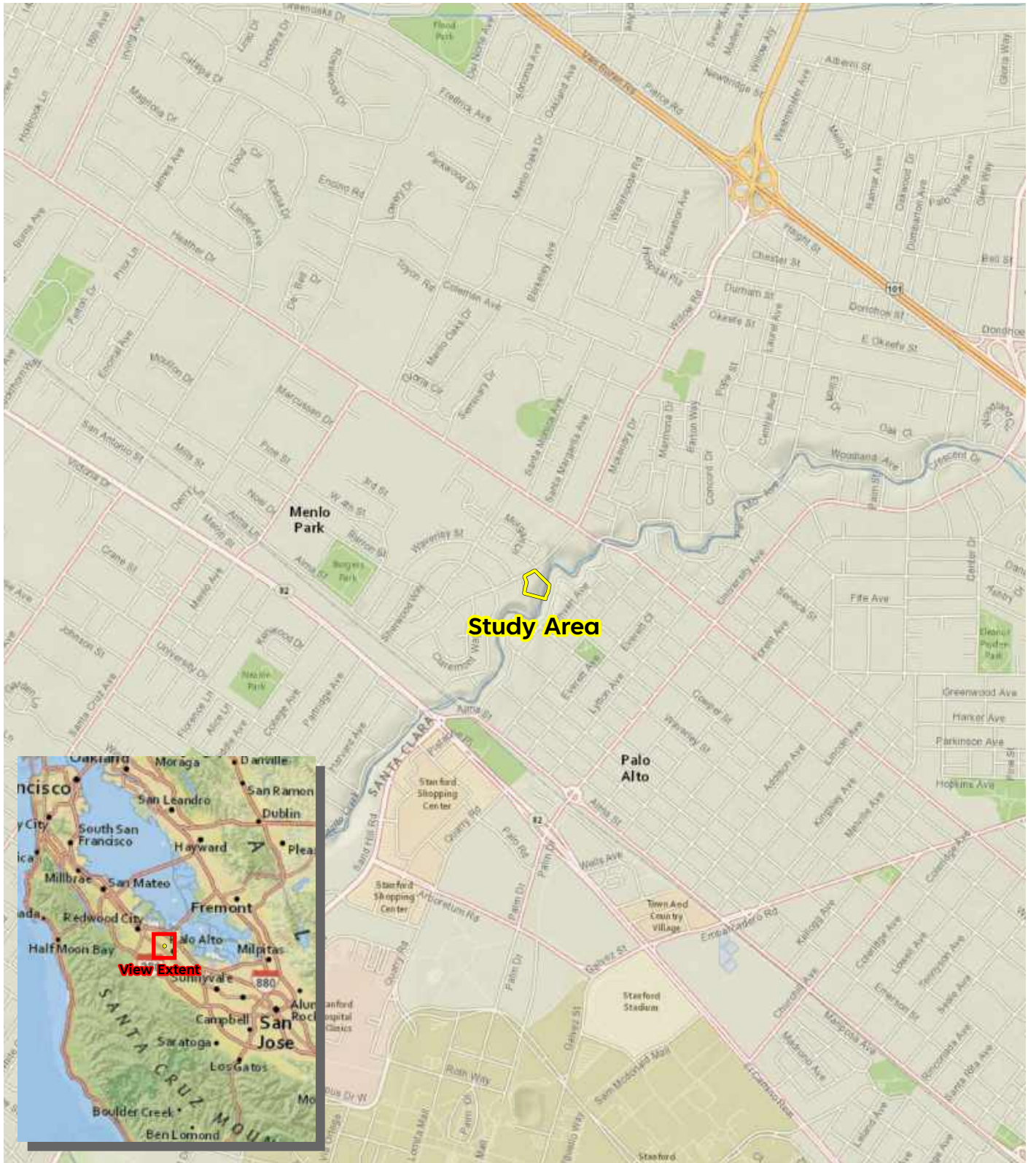
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APPENDIX A. FIGURES



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Sources: National Geographic, WRA | Prepared By: kobylarz, 7/26/2024

Figure 1. Study Area Regional Location Map

68 Willow Road
Menlo Park, California





Figure 2. Aerial Photograph of Study Area

68 Willow Road
Menlo Park, California

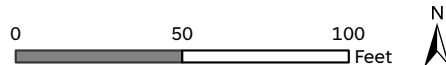
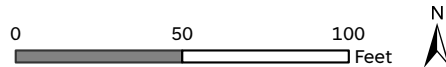




Figure 3. Soil Types within the Study Area

68 Willow Road
Menlo Park, California



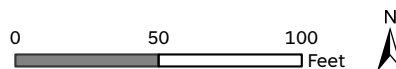
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Sources: USDA NAIP Imagery 2022, WRA | Prepared By: kobylarz, 7/26/2024

Figure 4. Land Cover Types within Study Area

68 Willow Road
Menlo Park, California



APPENDIX B. SPECIES OBSERVED IN AND AROUND THE PROJECT SITE



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Appendix B. Species observed in and Around the Study Area.

PLANTS						
SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS ¹	CAL-IPC STATUS ²	WETLAND STATUS ³
<i>Aesculus californica</i>	Buckeye	native	tree	-	-	-
<i>Agapanthus praecox</i>	Blue lily	non-native	perennial herb	-	-	-
<i>Bromus diandrus</i>	Ripgut brome	non-native (invasive)	annual grass	-	Moderate	-
<i>Camellia sp.</i>	Camellia	non-native	shrub	-	-	-
<i>Ceanothus sp.</i>	California lilac	native	tree, shrub	-	-	-
<i>Cedrus deodara</i>	Deodar cedar	non-native	tree	-	-	-
<i>Cirsium vulgare</i>	Bullthistle	non-native (invasive)	perennial herb	-	Moderate	FACU
<i>Claytonia perfoliata</i>	Miner's lettuce	native	annual herb	-	-	FAC
<i>Conium maculatum</i>	Poison hemlock	non-native (invasive)	perennial herb	-	Moderate	FACW
<i>Dietes sp.</i>	Fortnight lily	non-native	perennial herb	-	-	-
<i>Euphorbia sp.</i>	Spurge	non-native	annual or perennial herb	-	-	-
<i>Festuca arundinacea</i>	Tall fescue	non-native (invasive)	perennial grass	-	Moderate	FACU
<i>Galium aparine</i>	Cleavers	native	annual herb	-	-	FACU
<i>Hedera helix</i>	English ivy	non-native (invasive)	vine, shrub	-	High	FACU
<i>Helminthotheca echioides</i>	Bristly ox-tongue	non-native (invasive)	annual, perennial herb	-	Limited	FAC
<i>Heteromeles arbutifolia</i>	Toyon	native	shrub	-	-	-
<i>Lactuca sp.</i>	Wild lettuce	-	-	-	-	-
<i>Ligustrum lucidum</i>	Glossy privet	non-native (invasive)	tree, shrub	-	Limited	-
<i>Marah fabacea</i>	California man-root	native	perennial herb, vine	-	-	-
<i>Medicago polymorpha</i>	Bur clover	non-native (invasive)	annual herb	-	Limited	FACU
<i>Nerium oleander</i>	Oleander	non-native	tree	-	-	-



PLANTS						
SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS ¹	CAL-IPC STATUS ²	WETLAND STATUS ³
<i>Polystichum munitum</i>	Western sword fern	native	fern	-	-	FACU
<i>Populus</i> sp.	Poplar	non-native	tree	-	-	-
<i>Prunus</i> sp.	Plum	non-native	tree	-	-	-
<i>Quercus agrifolia</i>	Coast live oak	native	tree	-	-	-
<i>Quercus lobata</i>	Valley oak	native	tree	-	-	FACU
<i>Rosa</i> sp.	Rose	non-native	-	-	-	-
<i>Rubus armeniacus</i>	Himalayan blackberry	non-native (invasive)	shrub	-	High	FAC
<i>Salix</i> sp.	Willow	-	tree, shrub	-	-	-
<i>Salvia</i> sp.	Sage	-	perennial herb	-	-	-
<i>Scrophularia californica</i>	California bee plant	native	perennial herb	-	-	FAC
<i>Sequoia sempervirens</i>	Coast redwood	native	tree	-	-	-
<i>Solanum physalifolium</i> var. <i>nitidibaccatum</i>	Nightshade	non-native	annual herb	-	-	-
<i>Stipa miliacea</i> var. <i>miliacea</i>	Smilo grass	non-native (invasive)	perennial grass	-	Limited	-
<i>Torilis arvensis</i>	Field hedge parsley	non-native (invasive)	annual herb	-	Moderate	-
<i>Toxicodendron diversilobum</i>	Poison oak	native	vine, shrub	-	-	FACU
<i>Urtica dioica</i>	Stinging nettle	native	perennial herb	-	-	FAC
<i>Vinca major</i>	Greater periwinkle	non-native (invasive)	perennial herb	-	Moderate	FACU
<i>Wisteria</i> sp.	Wisteria	non-native	perennial herb, vine	-	-	-
<i>Zantedeschia aethiopica</i>	Callalily	non-native (invasive)	perennial herb	-	Limited	OBL

All species identified using the *Jepson Flora Project* (Jepson eFlora 2024); nomenclature follows Jepson eFlora. Sp.: “species,” intended to indicate that the observer was confident in the identity of the genus but uncertain which species.



PLANTS						
SCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS ¹	CAL-IPC STATUS ²	WETLAND STATUS ³
¹Rarity Status: The CNPS Inventory of Rare and Endangered Plants (CNPS 2024b)						
FE:	Federal Endangered					
FT:	Federal Threatened					
SE:	State Endangered					
ST:	State Threatened					
SR:	State Rare					
Rank 1A:	Plants presumed extirpated in California and either rare or extinct elsewhere					
Rank 1B:	Plants rare, threatened, or endangered in California and elsewhere					
Rank 2A:	Plants presumed extirpated in California, but more common elsewhere					
Rank 2B:	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 Cal-IPC Status: California Invasive Plant Inventory Status (Cal-IPC 2024)						
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					
³Wetland Status: National List of Plant Species that Occur in Wetlands, Arid West Region (Corps 2020)						
OBL:	Almost always a hydrophyte, rarely in uplands					
FACW:	Usually a hydrophyte, but occasionally found in uplands					
FAC:	Commonly either a hydrophyte or non-hydrophyte					
FACU:	Occasionally a hydrophyte, but usually found in uplands					
UPL:	Rarely a hydrophyte, almost always in uplands					
NL:	Rarely a hydrophyte, almost always in uplands					
NI:	No information; not factored during wetland delineation					





WILDLIFE		
SCIENTIFIC NAME	COMMON NAME	STATUS
BIRDS		
<i>Anas platyrhynchos</i>	mallard	No status
<i>Baeolophus inornatus</i>	oak titmouse	No status
<i>Buteo lineatus</i>	red-shouldered hawk	No status
<i>Colaptes auratus</i>	northern flicker	No status
<i>Haemorhous mexicanus</i>	house finch	No status
<i>Junco hyemalis</i>	dark-eyed junco	No status
<i>Melospiza crissalis</i>	California towhee	No status
<i>Pipilo maculatus</i>	spotted towhee	No status
<i>Poecile rufescens</i>	chestnut-backed chickadee	No status
<i>Spinus psaltria</i>	lesser goldfinch	No status
<i>Thryomanes bewickii</i>	Bewick's wren	No status
<i>Troglodytes aedon</i>	house wren	No status
MAMMALS		
<i>Sciurus carolinensis</i>	black squirrel	No status



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APPENDIX C. SPECIAL-STATUS SPECIES POTENTIAL TABLE

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Appendix C. Potential for Special Status Plant and Wildlife Species to Occur within the Project Site. List Compiled from the California Department of Fish and Wildlife Natural Diversity Database (CDFW 2025), U.S. Fish and Wildlife Service Information for Planning and Consultation Species Lists (USFWS 2025), and California Native Plant Society Rare Plant Inventory (CNPS 2025) search of the Palo Alto and surrounding eight U.S. Geological Survey 7.5' quadrangles.

SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
San Mateo thorn-mint <i>Acanthomintha duttonii</i>	FE, SE, Rank 1B.1	Chaparral, valley and foothill grassland. Elevation ranges from 165 to 985 feet (50 to 300 meters). Blooms Apr-Jun.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Franciscan onion <i>Allium peninsulare</i> var. <i>franciscanum</i>	Rank 1B.2	Cismontane woodland, valley and foothill grassland. Elevation ranges from 170 to 1000 feet (52 to 305 meters). Blooms (Apr)May-Jun.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
bent-flowered fiddleneck <i>Amsinckia lunaris</i>	Rank 1B.2	Cismontane woodland, coastal bluff scrub, valley and foothill grassland. Elevation ranges from 10 to 1640 feet (3 to 500 meters). Blooms Mar-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
California androsace <i>Androsace elongata</i> ssp. <i>acuta</i>	Rank 4.2	Chaparral, cismontane woodland, coastal scrub, meadows and seeps, pinyon and juniper woodland, valley and foothill grassland. Elevation ranges from 490 to 4280 feet (150 to 1305 meters). Blooms Mar-Jun.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Anderson's manzanita <i>Arctostaphylos andersonii</i>	Rank 1B.2	Broadleafed upland forest, chaparral, north coast coniferous forest.	No potential. Project Site is well outside the documented elevation range for this species. Project	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
		Elevation ranges from 195 to 2495 feet (60 to 760 meters). Blooms Nov-May.	Site does not provide suitable habitat to support this species.	
Kings Mountain manzanita <i>Arctostaphylos regismontana</i>	Rank 1B.2	Broadleafed upland forest, chaparral, north coast coniferous forest. Elevation ranges from 1000 to 2395 feet (305 to 730 meters). Blooms Dec-Apr.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
coastal marsh milk-vetch <i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>	Rank 1B.2	Coastal dunes (mesic), coastal scrub, marshes and swamps (coastal salt, streamsides). Elevation ranges from 0 to 180 feet (0 to 55 meters). Blooms (Apr-May) Jun-Oct.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
alkali milk-vetch <i>Astragalus tener</i> var. <i>tener</i>	Rank 1B.2	Playas, valley and foothill grassland (adobe clay), vernal pools. Elevation ranges from 5 to 195 feet (1 to 60 meters). Blooms Mar-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Brewer's calandrinia <i>Calandrinia breweri</i>	Rank 4.2	Chaparral, coastal scrub. Elevation ranges from 35 to 4005 feet (10 to 1220 meters). Blooms (Jan)Mar-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Oakland star-tulip <i>Calochortus umbellatus</i>	Rank 4.2	Broadleafed upland forest, chaparral, cismontane woodland, lower montane coniferous forest, valley and foothill	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
		grassland. Elevation ranges from 330 to 2295 feet (100 to 700 meters). Blooms Mar-May.		
pink star-tulip <i>Calochortus uniflorus</i>	Rank 4.2	Coastal prairie, coastal scrub, meadows and seeps, north coast coniferous forest. Elevation ranges from 35 to 3510 feet (10 to 1070 meters). Blooms Apr-Jun.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
johnny-nip <i>Castilleja ambigua</i> var. <i>ambigua</i>	Rank 4.2	Coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, valley and foothill grassland, vernal pools (margins). Elevation ranges from 0 to 1425 feet (0 to 435 meters). Blooms Mar-Aug.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Congdon's tarplant <i>Centromadia parryi</i> ssp. <i>congdonii</i>	Rank 1B.1	Valley and foothill grassland (alkaline). Elevation ranges from 0 to 755 feet (0 to 230 meters). Blooms (Apr)May-Oct (Nov).	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Point Reyes salty bird's-beak <i>Chloropyron maritimum</i> ssp. <i>palustre</i>	Rank 1B.2	Marshes and swamps (coastal salt). Elevation ranges from 0 to 35 feet (0 to 10 meters). Blooms Jun-Oct.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
fountain thistle <i>Cirsium fontinale</i> var. <i>fontinale</i>	FE, SE, Rank 1B.1	Chaparral (openings), cismontane woodland, meadows and seeps, valley and foothill	No potential. Project Site is well outside the documented elevation range for this species. Project	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
		grassland. Elevation ranges from 150 to 575 feet (45 to 175 meters). Blooms (Apr)May-Oct.	Site does not provide suitable habitat to support this species.	
lost thistle <i>Cirsium praeteriens</i>	Rank 1A	Presumed extinct; habitat unknown.	No potential. This species is presumed extinct.	No further actions are recommended for this species.
Santa Clara red ribbons <i>Clarkia concinna</i> ssp. <i>automixa</i>	Rank 4.3	Chaparral, cismontane woodland. Elevation ranges from 295 to 4920 feet (90 to 1500 meters). Blooms (Apr)May-Jun (Jul).	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
round-headed collinsia <i>Collinsia corymbosa</i>	Rank 1B.2	Coastal dunes. Elevation ranges from 0 to 65 feet (0 to 20 meters). Blooms Apr-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
San Francisco collinsia <i>Collinsia multicolor</i>	Rank 1B.2	Closed-cone coniferous forest, coastal scrub. Elevation ranges from 100 to 900 feet (30 to 275 meters). Blooms (Feb)Mar-May.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
clustered lady's-slipper <i>Cypripedium fasciculatum</i>	Rank 4.2	Lower montane coniferous forest, north coast coniferous forest. Elevation ranges from 330 to 7990 feet (100 to 2435 meters). Blooms Mar-Aug.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
mountain lady's-slipper <i>Cypripedium montanum</i>	Rank 4.2	Broadleafed upland forest, cismontane woodland, lower montane coniferous forest, north coast coniferous forest. Elevation ranges from 605	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
		to 7300 feet (185 to 2225 meters). Blooms Mar-Aug.		
paniculate tarplant <i>Deinandra paniculata</i>	Rank 4.2	Coastal scrub, valley and foothill grassland, vernal pools. Elevation ranges from 80 to 3085 feet (25 to 940 meters). Blooms (Mar)Apr-Nov.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
western leatherwood <i>Dirca occidentalis</i>	Rank 1B.2	Broadleafed upland forest, chaparral, cismontane woodland, closed-cone coniferous forest, north coast coniferous forest, riparian forest, riparian woodland. Elevation ranges from 80 to 1395 feet (25 to 425 meters). Blooms Jan-Mar (Apr).	Unlikely. Suitable riparian forest habitat occurs within the Project Site. The nearest documented occurrence is 2 miles upstream (southwest), at Stanford University, dated 1931. The nearest modern occurrence is 5 miles upstream (southwest) along San Francisquito Creek, from 2001.	No further actions are recommended for this species.
California bottle-brush grass <i>Elymus californicus</i>	Rank 4.3	Broadleafed upland forest, cismontane woodland, north coast coniferous forest, riparian woodland. Elevation ranges from 50 to 1540 feet (15 to 470 meters). Blooms May-Aug (Nov).	Unlikely. Suitable riparian forest habitat occurs within the Project Site. The nearest documented occurrence is 10 miles southwest, at the confluence of Weeks Creek and La Honda Creek, dated 2021.	No further actions are recommended for this species.
San Mateo woolly sunflower <i>Eriophyllum latilobum</i>	FE, SE, Rank 1B.1	Cismontane woodland (often serpentine, roadcuts), coastal scrub, lower montane coniferous forest. Elevation ranges from 150 to 1085 feet (45 to 330 meters). Blooms May-Jun.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
Hoover's button-celery <i>Eryngium aristulatum</i> var. <i>hooveri</i>	Rank 1B.1	Vernal pools. Elevation ranges from 10 to 150 feet (3 to 45 meters). Blooms (Jun)Jul (Aug).	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Jepson's coyote-thistle <i>Eryngium jepsonii</i>	Rank 1B.2	Valley and foothill grassland, vernal pools. Elevation ranges from 10 to 985 feet (3 to 300 meters). Blooms Apr-Aug.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
San Francisco wallflower <i>Erysimum franciscanum</i>	Rank 4.2	Chaparral, coastal dunes, coastal scrub, valley and foothill grassland. Elevation ranges from 0 to 1805 feet (0 to 550 meters). Blooms Mar-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
San Joaquin spearscale <i>Extriplex joaquinana</i>	Rank 1B.2	Chenopod scrub, meadows and seeps, playas, valley and foothill grassland. Elevation ranges from 5 to 2740 feet (1 to 835 meters). Blooms Apr-Oct.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
minute pocket moss <i>Fissidens pauperculus</i>	Rank 1B.2	North coast coniferous forest (damp coastal soil). Elevation ranges from 35 to 3360 feet (10 to 1024 meters). Blooms .	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Hillsborough chocolate lily <i>Fritillaria biflora</i> var. <i>ineziana</i>	Rank 1B.1	Cismontane woodland, valley and foothill grassland. Elevation ranges from 490 to 490 feet (150 to 150 meters). Blooms Mar-Apr.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
fragrant fritillary <i>Fritillaria liliacea</i>	Rank 1B.2	Cismontane woodland, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 10 to 1345 feet (3 to 410 meters). Blooms Feb-Apr.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
short-leaved evax <i>Hesperivax sparsiflora</i> var. <i>brevifolia</i>	Rank 1B.2	Coastal bluff scrub (sandy), coastal dunes, coastal prairie. Elevation ranges from 0 to 705 feet (0 to 215 meters). Blooms Mar-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Marin western flax <i>Hesperolinon congestum</i>	FT, ST, Rank 1B.1	Chaparral, valley and foothill grassland. Elevation ranges from 15 to 1215 feet (5 to 370 meters). Blooms Apr-Jul.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Loma Prieta hoita <i>Hoita strobilina</i>	Rank 1B.1	Chaparral, cismontane woodland, riparian woodland. Elevation ranges from 100 to 2820 feet (30 to 860 meters). Blooms May-Jul (Aug-Oct).	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
harlequin lotus <i>Hosackia gracilis</i>	Rank 4.2	Broadleafed upland forest, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal prairie, coastal scrub, marshes and swamps, meadows and seeps, north coast coniferous forest, valley and foothill	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
		grassland. Elevation ranges from 0 to 2295 feet (0 to 700 meters). Blooms Mar-Jul.		
coast iris <i>Iris longipetala</i>	Rank 4.2	Coastal prairie, lower montane coniferous forest, meadows and seeps. Elevation ranges from 0 to 1970 feet (0 to 600 meters). Blooms Mar-May (Jun).	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Contra Costa goldfields <i>Lasthenia conjugens</i>	FE, Rank 1B.1	Cismontane woodland, playas (alkaline), valley and foothill grassland, vernal pools. Elevation ranges from 0 to 1540 feet (0 to 470 meters). Blooms Mar-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
legenere <i>Legenere limosa</i>	Rank 1B.1	Vernal pools. Elevation ranges from 5 to 2885 feet (1 to 880 meters). Blooms Apr-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
serpentine leptosiphon <i>Leptosiphon ambiguus</i>	Rank 4.2	Cismontane woodland, coastal scrub, valley and foothill grassland. Elevation ranges from 395 to 3710 feet (120 to 1130 meters). Blooms Mar-Jun.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
bristly leptosiphon <i>Leptosiphon aureus</i>	Rank 4.2	Chaparral, cismontane woodland, coastal prairie, valley and foothill grassland. Elevation ranges from 180 to 4920 feet (55 to 1500 meters). Blooms Apr-Jul.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
large-flowered leptosiphon <i>Leptosiphon grandiflorus</i>	Rank 4.2	Cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal dunes, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 15 to 4005 feet (5 to 1220 meters). Blooms Apr-Aug.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
broad-lobed leptosiphon <i>Leptosiphon latisectus</i>	Rank 4.3	Broadleaved upland forest, cismontane woodland. Elevation ranges from 560 to 4920 feet (170 to 1500 meters). Blooms Apr-Jun.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Crystal Springs lessingia <i>Lessingia arachnoidea</i>	Rank 1B.2	Cismontane woodland, coastal scrub, valley and foothill grassland. Elevation ranges from 195 to 655 feet (60 to 200 meters). Blooms Jul-Oct.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
woolly-headed lessingia <i>Lessingia hololeuca</i>	Rank 3	Broadleaved upland forest, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Elevation ranges from 50 to 1000 feet (15 to 305 meters). Blooms Jun-Oct.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
spring lessingia <i>Lessingia tenuis</i>	Rank 4.3	Chaparral, cismontane woodland, lower montane coniferous forest. Elevation ranges from 985	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
		to 7055 feet (300 to 2150 meters). Blooms May-Jul.		
arcuate bush-mallow <i>Malacothamnus arcuatus</i> var. <i>arcuatus</i>	Rank 1B.2	Chaparral, cismontane woodland. Elevation ranges from 50 to 1165 feet (15 to 355 meters). Blooms Apr-Sep.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
woodland woollythreads <i>Monolopia gracilens</i>	Rank 1B.2	Broadleaved upland forest (openings), chaparral (openings), cismontane woodland, north coast coniferous forest (openings), valley and foothill grassland. Elevation ranges from 330 to 3935 feet (100 to 1200 meters). Blooms (Feb)Mar-Jul.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Dudley's lousewort <i>Pedicularis dudleyi</i>	SR, Rank 1B.2	Chaparral (maritime), cismontane woodland, north coast coniferous forest, valley and foothill grassland. Elevation ranges from 195 to 2955 feet (60 to 900 meters). Blooms Apr-Jun.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
white-rayed pentachaeta <i>Pentachaeta bellidiflora</i>	FE, SE, Rank 1B.1	Cismontane woodland, valley and foothill grassland (often serpentine). Elevation ranges from 115 to 2035 feet (35 to 620 meters). Blooms Mar-May.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
Gairdner's yampah <i>Perideridia gairdneri</i> ssp. <i>gairdneri</i>	Rank 4.2	Broadleaved upland forest, chaparral, coastal prairie, valley and foothill grassland, vernal pools. Elevation ranges from 0 to 2000 feet (0 to 610 meters). Blooms Jun-Oct.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
white-flowered rein orchid <i>Piperia candida</i>	Rank 1B.2	Broadleaved upland forest, lower montane coniferous forest, north coast coniferous forest. Elevation ranges from 100 to 4300 feet (30 to 1310 meters). Blooms (Mar-Apr) May-Sep.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Michael's rein orchid <i>Piperia michaelii</i>	Rank 4.2	Chaparral, cismontane woodland, closed-cone coniferous forest, coastal bluff scrub, coastal scrub, lower montane coniferous forest. Elevation ranges from 10 to 3000 feet (3 to 915 meters). Blooms Apr-Aug.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Choris' popcornflower <i>Plagiobothrys chorisianus</i> var. <i>chorisianus</i>	Rank 1B.2	Chaparral, coastal prairie, coastal scrub. Elevation ranges from 10 to 525 feet (3 to 160 meters). Blooms Mar-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Hickman's popcornflower <i>Plagiobothrys chorisianus</i> var. <i>hickmanii</i>	Rank 4.2	Chaparral, closed-cone coniferous forest, coastal scrub, marshes and swamps, vernal pools. Elevation ranges from 50	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
		to 1280 feet (15 to 390 meters). Blooms Apr-Jun.		
hairless popcornflower <i>Plagiobothrys glaber</i>	Rank 1A	Marshes and swamps (coastal salt), meadows and seeps (alkaline). Elevation ranges from 50 to 590 feet (15 to 180 meters). Blooms Mar-May.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Lobb's aquatic buttercup <i>Ranunculus lobbii</i>	Rank 4.2	Cismontane woodland, north coast coniferous forest, valley and foothill grassland, vernal pools. Elevation ranges from 50 to 1540 feet (15 to 470 meters). Blooms Feb-May.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Sanford's arrowhead <i>Sagittaria sanfordii</i>	Rank 1B.2	Marshes and swamps (shallow freshwater). Elevation ranges from 0 to 2135 feet (0 to 650 meters). Blooms May-Oct (Nov).	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Hoffmann's sanicle <i>Sanicula hoffmannii</i>	Rank 4.3	Broadleafed upland forest, chaparral, cismontane woodland, coastal bluff scrub, coastal scrub, lower montane coniferous forest. Elevation ranges from 100 to 985 feet (30 to 300 meters). Blooms Mar-May.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
chaparral ragwort <i>Senecio aphanactis</i>	Rank 2B.2	Chaparral, cismontane woodland, coastal scrub. Elevation ranges from 50 to 2625 feet (15 to 800 meters). Blooms Jan-Apr (May).	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
San Francisco campion <i>Silene verecunda</i> ssp. <i>verecunda</i>	Rank 1B.2	Chaparral, coastal bluff scrub, coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 100 to 2115 feet (30 to 645 meters). Blooms (Feb)Mar-Jul(Aug).	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
long-styled sand-spurrey <i>Spergularia macrotheca</i> var. <i>longistyla</i>	Rank 1B.2	Marshes and swamps, meadows and seeps. Elevation ranges from 0 to 835 feet (0 to 255 meters). Blooms Feb-May.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
northern slender pondweed <i>Stuckenia filiformis</i> ssp. <i>alpina</i>	Rank 2B.2	Marshes and swamps (shallow freshwater). Elevation ranges from 985 to 7055 feet (300 to 2150 meters). Blooms May-Jul.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
California seablite <i>Suaeda californica</i>	FE, Rank 1B.1	Marshes and swamps (coastal salt). Elevation ranges from 0 to 50 feet (0 to 15 meters). Blooms Jul-Oct.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
two-fork clover <i>Trifolium amoenum</i>	FE, Rank 1B.1	Coastal bluff scrub, valley and foothill grassland (sometimes serpentine). Elevation ranges from 15	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
PLANTS				
		to 1360 feet (5 to 415 meters). Blooms Apr-Jun.		
Santa Cruz clover <i>Trifolium buckwestiorum</i>	Rank 1B.1	Broadleafed upland forest, cismontane woodland, coastal prairie. Elevation ranges from 115 to 2000 feet (35 to 610 meters). Blooms Apr-Oct.	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
saline clover <i>Trifolium hydrophilum</i>	Rank 1B.2	Marshes and swamps, valley and foothill grassland (mesic, alkaline), vernal pools. Elevation ranges from 0 to 985 feet (0 to 300 meters). Blooms Apr-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
San Francisco owl's-clover <i>Triphysaria floribunda</i>	Rank 1B.2	Coastal prairie, coastal scrub, valley and foothill grassland. Elevation ranges from 35 to 525 feet (10 to 160 meters). Blooms Apr-Jun.	No potential. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.
Methuselah's beard lichen <i>Usnea longissima</i>	Rank 4.2	Broadleafed upland forest, north coast coniferous forest. Elevation ranges from 165 to 4790 feet (50 to 1460 meters).	No potential. Project Site is well outside the documented elevation range for this species. Project Site does not provide suitable habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
MAMMALS				
American badger <i>Taxidea taxus</i>	CDFW Species of Special Concern	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Requires friable soils and open, uncultivated ground. Preys on burrowing rodents.	No Potential. Suitable habitats of friable soils and open, uncultivated ground do not occur within the Project Site. The close proximity to existing development and anthropogenic disturbance is likely to dissuade badgers from use of the area. No badger dens were observed during site visits.	No further actions are recommended for this species.
Hoary bat <i>Lasiurus cinereus</i>	WBWG Medium Priority	Prefers open forested habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths.	Moderate Potential. Several large trees which provide suitable roosting substrates for this species occur within the Project Site. The nearest documented occurrence of this species is a historical occurrence from 1894, which overlaps the Project Site. The nearest modern occurrence is approximately 3 miles northwest, in downtown Redwood City, dated 1991.	See section 7.1 for further discussion of this species.
Pallid bat <i>Antrozous pallidus</i>	CDFW Species of Special Concern WBWG High Priority	Found in a variety of habitats ranging from grasslands to mixed forests, favouring open and dry, rocky areas. Roost sites include crevices in rock outcrops and cliffs, caves, mines, hollow trees, and various manmade structures such as bridges, barns, and	Moderate Potential. Several large trees which provide suitable roosting substrates for this species occur within the Project Site. The nearest documented occurrence of this species is a historical occurrence approximately 1 mile south, within Stanford University, dated 1951.	See section 7.1 for further discussion of this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		buildings (including occupied buildings). Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.		
San Francisco dusky-footed woodrat <i>Neotoma fuscipes annectens</i>	CDFW Species of Special Concern	Forest habitats of moderate canopy and moderate to dense understory, and in chaparral habitats. Constructs nests of shredded grass, leaves, and other material. May be limited by availability of nest-building materials.	Moderate Potential. The riparian habitat provides suitable nesting habitats of moderate canopy and dense understory to support this species. The nearest documented occurrence of this species is approximately 4 miles southwest of the Project Site, near San Francisquito Creek and I-280.	See Section 7.1 for further discussion of this species.
Salt-marsh harvest mouse <i>Reithrodontomys raviventris</i>	Federal Endangered California Endangered	Endemic to emergent salt and brackish wetlands of the San Francisco Bay Estuary. Pickleweed marshes are primary habitat; also occurs in various other wetland communities with dense vegetation. Does not burrow, builds loosely organized nests. Requires higher areas for flood escape.	No Potential. The Project Site is not located within or adjacent to a wetland where suitable habitat would be present.	No further actions are recommended for this species.
Salt-marsh wandering shrew <i>Sorex vagrans halicoetes</i>	CDFW Species of Special Concern	Salt marshes of the south arm of San Francisco Bay. Medium high marsh 6 to 8 feet above sea level	No Potential. No suitable salt marsh habitat occurs within the Project Site.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		where abundant driftwood is scattered among <i>Salicornia</i> .		
Townsend's western big-eared bat <i>(Corynorhinus townsendii townsendii)</i>	CDFW Species of Special Concern WBWG High Priority	Associated with a wide variety of habitats from deserts to higher elevation mixed and coniferous forests. Females form maternity colonies in buildings, caves and mines, and males roost singly or in small groups. Foraging typically occurs at edge habitats near wooded areas, e.g. along streams.	No Potential. Suitable roosting habitats (e.g., mines, caves or abandoned buildings) to support this species do not occur within the Project Site.	No further actions are recommended for this species.
BIRDS				
tricolored blackbird <i>Agelaius tricolor</i>	California Threatened CDFW Species of Special Concern	Nearly endemic to California, where it is most numerous in the Central Valley and vicinity. Highly colonial, nesting in dense aggregations over or near freshwater in emergent growth or riparian thickets. Also uses flooded agricultural fields. Abundant insect prey near breeding areas essential.	Unlikely. The Project Site contains suitable riparian thickets which provide potential nesting habitat for this species. However, there are no documented occurrences within 5 miles of the Project Site.	No further actions are recommended for this species.
great blue heron <i>Ardea herodias</i>	Breeding sites protected by CDFW	Year-round resident. Nests colonially or semi-colonially in tall trees and on cliffs, also sequestered	Unlikely. The Project Site provides suitable foraging and nesting habitat consisting of an intermittent stream and	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		terrestrial substrates. Breeding sites usually in close proximity to foraging areas: marshes, lake margins, tidal flats, and rivers. Forages primarily on fishes and other aquatic prey, also smaller terrestrial vertebrates.	surrounding tall trees. However, there are no documented occurrences within 5 miles of the Project Site.	
Short-eared owl <i>Asio flammeus</i>	CDFW Species of Special Concern	Occurs year-round, but primarily as a winter visitor, breeding very restricted in most of California. Found in open, treeless areas (e.g., marshes, grasslands) with elevated sites for foraging perches and dense herbaceous vegetation for roosting and nesting. Preys mostly on small mammals, particularly voles.	No Potential. The Project Site does not provide suitable treeless areas or grasslands to support this species. There are no treeless areas or grasslands to support this species.	No further actions are recommended for this species.
Long-eared owl <i>Asio otus</i>	CDFW Species of Special Concern	Occurs year-round in California. Nests in trees in a variety of woodland habitats, including oak and riparian, as well as tree groves. Requires adjacent open land with rodents for foraging, and the presence of old nests of larger birds (hawks,	Unlikely. Riparian and oak trees are present within the Project Site, which provide suitable nesting habitat to support this species. However, there are no documented occurrences within 5 miles of the Project Site.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		crows, magpies) for breeding.		
burrowing owl <i>Athene cunicularia</i>	CDFW Species of Special Concern	Year-round resident and winter visitor. Occurs in open, dry grasslands and scrub habitats with low-growing vegetation, perches, and abundant mammal burrows. Preys upon insects and small vertebrates. Nests and roosts in old mammal burrows, most commonly those of ground squirrels.	No Potential. There are no open or dry grasslands to provide suitable burrowing habitat. The nearest documented occurrence of this species is approximately 4 miles west, from 1983, near the outflow of San Francisquito Creek into the San Francisco Bay.	No further actions are recommended for this species.
Mountain lion <i>Puma concolor</i>	California Candidate (central coast and southern CA)	Ranging from Chile to British Columbia, and adapting to virtually any habitat that contains its primary prey sources of deer and other large mammals. Widespread, yet uncommon in much of its range, and rarely seen.	No Potential. The Project Site does not contain suitable habitat to support this species. There are no documented occurrences of this species within 5 miles of the Project Site.	No further actions are recommended for this species.
Marbled murrelet <i>Brachyramphus marmoratus</i>	Federal Threatened California Endangered	Predominantly coastal marine. Nests in old-growth coniferous forests up to 30 miles inland along the Pacific coast, from Eureka to Oregon border, and in Santa Cruz/San Mateo Counties. Nests are highly cryptic, and typically located on platform-like branches of mature redwoods and	No Potential. The Project Site does not contain old-growth coniferous forests to support nesting habit for this species. Marine invertebrates are not present for foraging as the Project Site is within a freshwater stream. Critical habitat for this species is mapped approximately 7 miles west of the Project Site, within the Pleger Estate and	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		Douglas firs. Forages on marine invertebrates and small fishes.	Golden Gate National Recreation Area.	
Western snowy plover <i>Charadrius nivosus nivosus</i>	Federal Threatened CDFW Species of Special Concern	Federal listing applies only to the Pacific coastal population. Year-round resident and winter visitor. Occurs on sandy beaches, salt pond levees, and the shores of large alkali lakes. Nests on the ground, requiring sandy, gravelly or friable soils.	No Potential. The Project Site does not contain suitable sandy substrates to support nesting habitat for this species.	No further actions are recommended for this species.
northern harrier <i>Circus hudsonius</i>	CDFW Species of Special Concern	Year-round resident and winter visitor. Found in open habitats including grasslands, prairies, marshes, and agricultural areas. Nests on the ground in dense vegetation, typically near water or otherwise moist areas. Preys on small vertebrates.	No Potential. The Project Site does not contain grasslands with small patches of vegetation to support this species.	No further actions are recommended for this species.
Yellow rail <i>Coturnicops noveboracensis</i>	CDFW Species of Special Concern	Summer resident in eastern Sierra Nevada in Mono County, breeding in shallow freshwater marshes and wet meadows with dense vegetation. Also a rare winter visitor along the coast and other portions of the state. Extremely cryptic.	No Potential. The Project Site does not contain marsh or meadows habitats present to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
yellow-billed cuckoo <i>Coccyzus americanus occidentalis</i>	Federal Threatened California Endangered California Fully Protected	Summer resident, breeding in dense riparian forests and jungles, typically with early successional vegetation present. Utilizes densely-foliaged deciduous trees and shrubs. Eats mostly caterpillars. Current breeding distribution within California very restricted.	Unlikely. The Project Site does not contain suitable dense riparian forest habitat to support this species.	No further actions are recommended for this species.
white-tailed kite <i>Elanus leucurus</i>	CDFW Fully Protected	Year-round resident in coastal and valley lowlands with scattered trees and large shrubs, including grasslands, marshes, and agricultural areas. Nests in trees, of which the type and setting are highly variable. Preys on small mammals and other vertebrates.	Moderate Potential. Mature trees within the Project Site provide suitable nesting habitat to support this species. The landscaped areas of the Project Site may provide degraded lowlands with scattered trees and shrubs suitable as foraging habitat. There are 5 observations of this species along San Francisquito Creek within 1 mile of the Project site	See Section 7.1 for further discussion of this species.
American peregrine falcon <i>Falco peregrinus anatum</i>	Delisted	Year-round resident and winter visitor. Occurs in a wide variety of habitats, though often associated with coasts, bays, marshes and other bodies of water. Nests on protected cliffs and on man-made structures including buildings and bridges. Preys on birds,	No Potential. The Project Site does not contain cliffs or man-made structures to support nesting habitat for this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		especially waterbirds. Forages widely.		
Saltmarsh common yellowthroat <i>Geothlypis trichas sinuosa</i>	CDFW Species of Special Concern	Resident of the San Francisco Bay region, in fresh and saltwater marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.	No Potential. The Project Site does not contain suitable marsh habitat to support this species.	No further actions are recommended for this species.
Bald eagle <i>Haliaeetus leucocephalus</i>	Federal Delisted California Endangered	Occurs year-round in California, but primarily a winter visitor; breeding population is growing. Nests in large trees in the vicinity of larger lakes, reservoirs, and rivers. Wintering habitat somewhat more variable but usually features large concentrations of waterfowl or fish.	No Potential. The Project Site contains few large trees suitable to support nesting habitat for this species. There are no large lakes or reservoirs in the Project Site vicinity. The nearest documented occurrence of this species is approximately 4 miles southeast, along Felt Creek in Stanford University, from 2016.	No further actions are recommended for this species.
California black rail <i>Laterallus jamaicensis coturniculus</i>	California Threatened CDFW Species of Special Concern	Year-round resident in marshes (saline to freshwater) with dense vegetation within four inches of the ground. Prefers larger, undisturbed marshes that have an extensive upper zone and are close to a major water source. Extremely secretive and cryptic.	No Potential. The Project Site does not contain suitable marsh habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
Alameda song sparrow <i>Melospiza melodia pusillula</i>	CDFW Species of Special Concern BCC	Year-round resident of salt marshes bordering the south arm of San Francisco Bay. Inhabits primarily pickleweed marshes; nests placed in marsh vegetation, typically shrubs such as gumplant.	No Potential. The Project Site does not contain suitable marsh habitat to support this species.	No further actions are recommended for this species.
Double-crested cormorant <i>Nannopterum auritum</i>	Watch List	Rookery site) colonial nester on coastal cliffs, offshore islands, and along lake margins in the interior of the state. Nests along coast on sequestered islets, usually on ground with sloping surface, or in tall trees along lake margins.	No Potential. The Project Site does not contain suitable cliffs, islands, or lake margins to support nesting habitat for this species.	No further actions are recommended for this species.
Black-crowned night heron <i>Nycticorax nycticorax</i>		Year-round resident. Nests colonially, usually in trees but also in patches of emergent vegetation. Rookery sites are often on islands and usually located adjacent to foraging areas: margins of lakes and bays.	No Potential. The Project Site does not contain suitable patches of emergent vegetation to support nesting habitat for this species.	No further actions are recommended for this species.
California Ridgeway's rail <i>Rallus obsoletus obsoletus</i>	Federal Endangered California Endangered	Year-round resident in tidal marshes of the San Francisco Bay estuary. Requires tidal sloughs and intertidal mud flats for foraging, and dense marsh vegetation for	No Potential. The Project Site and the immediate vicinity does not contain suitable tidal marsh habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		nesting and cover. Typical habitat features abundant growth of cordgrass and pickleweed. Feeds primarily on molluscs and crustaceans.		
Bank swallow <i>Riparia riparia</i>	California Threatened	Summer resident in riparian and other lowland habitats near rivers, lakes, and the ocean in northern California. Nests colonially in excavated burrows on vertical cliffs and bank cuts (natural and manmade) with fine-textured soils. Historical nesting range in southern and central areas of California has been eliminated by habitat loss. Currently known to breed in Siskiyou, Shasta, and Lassen Cos., portions of the north coast, and along the Sacramento River from Shasta Co. south to Yolo. Co.	Unlikely. The Project Site does contain riparian habitat; however, it does not contain suitable cliffs with burrows or bank cuts with fine-textured soil to support nesting habitat for this species.	No further actions are recommended for this species.
Black skimmer <i>Rynchops niger</i>	CDFW Species of Special Concern	Found primarily in southern California; South San Francisco Bay has a small resident population. Nests colonially on gravel bars, low islets, and sandy beaches	No Potential. The Project Site does not contain suitable gravel bars, low islets, or sandy beaches to support nesting habitat for this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
California least tern <i>Sternula antillarum browni</i>	Federal Endangered California Endangered	Summer resident along the coast from San Francisco Bay south to northern Baja California; inland breeding also very rarely occurs. Nests colonially on barren or sparsely vegetated areas with sandy or gravelly substrates near water, including beaches, islands, and gravel bars. In San Francisco Bay, has also nested on salt pond margins.	No Potential. The Project Site does not contain suitable sandy or gravelly substrates to support nesting habitat for this species.	No further actions are recommended for this species.
REPTILES & AMPHIBIANS				
western pond turtle <i>Actinemys marmorata</i>	CDFW Species of Special Concern	A thoroughly aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation. Require basking sites such as partially submerged logs, vegetation mats, or open mud banks, and suitable upland habitat (sandy banks or grassy open fields) for egg-laying.	Moderate Potential. Suitable aquatic habitat occurs adjacent to the Project Site. The Project Site is mapped within a historical occurrence from 1902 (1-mile radius). Another historical occurrence from 1953 is recorded 2 miles southwest of the Project Site, within Stanford University. The nearest modern occurrence is 4.3 miles southwest, along Los Trancos Creek in Stanford University, dated 2017.	See section 7.1 for further discussion of this species.
California tiger salamander - central California DPS <i>Ambystoma californiense</i> pop. 1	Federal Threatened California Threatened	Populations in Santa Barbara and Sonoma counties currently listed as endangered; threatened in remainder	No Potential. The Project Site does not provide seasonal pool habitats suitable for breeding, and it does not contain suitable upland refugia habitat.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		of range. Inhabits grassland, oak woodland, ruderal and seasonal pool habitats. Adults are fossorial and utilize mammal burrows and other subterranean refugia. Breeding occurs primarily in vernal pools and other seasonal water features.		
Santa Cruz black salamander <i>Aneides niger</i>	CDFW Species of Special Concern	Climbing salamanders of the genus <i>Aneides</i> frequent damp woodlands and are usually found hiding under various debris (i.e. bark, woodrat nests, logs). The Santa Cruz black salamander exists south of the San Francisco Bay and was only recently recognized as a separate and protected species. Santa Cruz black salamander is highly sedentary, preferring to stay hidden under riparian debris. Prey items include millipedes, spiders, and other insects (Stebbins and McGinnis 2012).	No Potential. The Project Site does not provide suitable damp woodlands to support this species.	No further actions are recommended for this species.
California giant salamander <i>Dicamptodon ensatus</i>	CDFW Species of Special Concern	Occurs in the north-central Coast Ranges. Moist coniferous and	No Potential. The Project Site does contain suitable permanent	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		mixed forests are typical habitat; also uses woodland and chaparral. Adults are terrestrial and fossorial, breeding in cold, permanent, or semi-permanent streams. Larvae usually remain aquatic for over a year.	or semi-permanent streams to support this species.	
foothill yellow-legged frog <i>Rana boylei</i>	Federal Threatened California Endangered	Found in or adjacent to rocky streams in a variety of habitats. Prefers partly shaded, shallow streams and riffles with a rocky substrate; requires at least some cobble-sized substrate for egg-laying. Needs at least 15 weeks to attain metamorphosis. Feeds on both aquatic and terrestrial invertebrates.	Unlikely. Aquatic habitat with adequate cobble-sized substrate is present for breeding habitat. However, the stream is seasonal and unlikely to support this species year-round. The only occurrence within 5 miles of the Project Site is an historical occurrence from 1907, 0.7 mile southeast, within Stanford University.	No further actions are recommended for this species.
California red-legged frog <i>Rana draytonii</i>	Federal Threatened CDFW Species of Special Concern	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11 to 20 weeks of permanent water for larval development. Associated with quiet perennial to intermittent ponds, stream pools and wetlands. Prefers	Moderate Potential. Suitable aquatic habitat (i.e. San Francisquito Creek) is mapped adjacent to the Project Site. Critical habitat for this species is mapped 7 miles southwest of the Project Site, on the western side of Skyline Blvd. The nearest occurrence of this species is a historical occurrence, 2.1 miles southwest, within Stanford University. A modern occurrence from 2007 is mapped 3.7 miles	See Section 7.1 for further discussion of this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		shorelines with extensive vegetation. Disperses through upland habitats after rains.	upstream within San Francisquito Creek along Jasper Ridge.	
Red-bellied newt <i>Taricha rivularis</i>	CDFW Species of Special Concern	Inhabits coastal forests from southern Sonoma County northward, with an isolated population in Santa Clara County. Redwood forest provides typical habitat, though other forest types (e.g., hardwood) are also occupied. Adults are terrestrial and fossorial. Breeding occurs in streams, usually with relatively strong flow.	No Potential. The Project Site does not contain suitable forests present to support this species.	No further actions are recommended for this species.
San Francisco gartersnake <i>Thamnophis sirtalis tetrataenia</i>	Federal Endangered California Endangered	Vicinity of freshwater marshes, ponds and slow-moving streams in San Mateo County and extreme northern Santa Cruz County. Prefers dense cover and water depths of at least one foot. Upland areas near water are also very important.	Unlikely. Some dense cover is present within the Project Site; however, the water source is not present year-round to support this species year-round, and potential upland refugia habitat is developed and highly degraded within the Project Site.	No further actions are recommended for this species.
FISH				
Longfin smelt <i>Spirinchus thaleichthys</i>	Proposed Federal Endangered	Euryhaline, nektonic and anadromous. Found in open waters of estuaries, mostly in middle or	No Potential. The Project Site does not contain suitable saline aquatic habitat to support this species.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
	California Threatened	bottom of water column. Prefer salinities of 15 to 30 ppt but can be found in completely freshwater to almost pure seawater.		
steelhead - central CA coast DPS <i>Oncorhynchus mykiss irideus</i>	Federal Threatened	Occurs from the Russian River south to Soquel Creek and Pajaro River. Also in San Francisco and San Pablo Bay Basins. Adults migrate upstream to spawn in cool, clear, well-oxygenated streams. Juveniles remain in fresh water for 1 or more years before migrating downstream to the ocean.	High Potential. San Francisquito Creek is mapped as Critical Habitat for this species for rearing and migration habitat within the Project Site (USFWS 2024). Adult and juvenile salmonids have been documented in previous surveys (Leidy et al., 2005).	See Section 7.1 for further discussion of this species.
Coho salmon - central CA coast ESU <i>Oncorhynchus kisutch</i>	Federal Endangered California Endangered NMFS	Federal listing includes populations between Punta Gorda and San Lorenzo River. State listing includes populations south of San Francisco Bay only. Occurs inland and in coastal marine waters. Requires beds of loose, silt-free, coarse gravel for spawning. Also needs cover, cool water and sufficient dissolved oxygen.	Unlikely. San Francisquito Creek is mapped within Essential Fish Habitat for coho salmon. However, there are no documented occurrences of this species within 5 miles of the Project Site.	See Section 7.1 for further discussion of this species.
Chinook salmon - California coastal ESU	Federal Threatened	California Coastal Chinook Salmon ESU includes all naturally	Unlikely. San Francisquito Creek is mapped within Essential Fish Habitat for chinook salmon.	See Section 7.1 for further discussion of this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
<i>Oncorhynchus tshawytscha</i>		spawned populations of Chinook salmon from rivers and streams south of the Klamath River (exclusive) to the Russian River (inclusive). Adult numbers depend on pool depth and volume, amount of cover, and proximity to gravel. Water temps >27 degrees C lethal to adults.	However, there are no documented occurrences of this species within 5 miles of the Project Site.	
INVERTEBRATES				
Obscure bumble bee <i>Bombus caliginosus</i>	Special Animals List	Obscure bumble bees inhabit coastal meadows and open grassy prairies. Nests may be located underground or above ground in old bird or rodent nests, rock piles, tree cavities, and tufts of grass.	No Potential. The Project Site does not contain suitable coastal meadows or open grassy prairies to support this species. Suitable floral resources are not present in the Project Site.	No further actions are recommended for this species.
Crotch bumble bee <i>Bombus crotchii</i>	California Candidate Endangered	Range largely restricted to California, favouring grassland and scrub habitats. Typical of bumble bees, nests are usually constructed underground.	No Potential. The Project Site does not consist of grassland or scrub habitats to support this species. Suitable floral resources are not present in the Project Site.	No further actions are recommended for this species.
western bumble bee <i>Bombus occidentalis</i>	California Candidate Endangered	Formerly common throughout much of western North America; populations from southern British Columbia to	No Potential. There are no pre-existing cavities present to support this species. Suitable floral resources are not present in the Project Site.	No further actions are recommended for this species.



SCIENTIFIC NAME	STATUS ^{1, 2}	HABITAT	POTENTIAL FOR OCCURRENCE	RECOMMENDATIONS
WILDLIFE				
		central California have nearly disappeared. Occurs in a wide variety of habitat types. Nests are constructed annually in pre-existing cavities, usually on the ground (e.g. mammal burrows). Many plant species are visited and pollinated.		
Monarch butterfly – California overwintering population <i>Danaus Plexippus pop. 1</i>	Candidate Federal Listing Roosts protected by CDFW	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, Monterey cypress), with nectar and water sources nearby.	No Potential. The Project Site does not contain suitable overwintering habitat (e.g., wind-protected mature tree groves) to support this species. There are no documented occurrences of this species within 5 miles of the Project Site.	No further actions are recommended for this species.
Bay checkerspot butterfly <i>Euphydryas Editha bayensis</i>	Federal Threatened	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay. <i>Plantago erecta</i> is the primary host plant; <i>Orthocarpus densiflorus</i> and <i>O. purpurscens</i> are the secondary host plants.	No Potential. The Project Site does not contain suitable native grasslands on outcrops of serpentine soil to support this species. Suitable floral resources are not present in the Project Site. Critical habitat for this species is mapped approximately 4 miles southwest, along the San Francisquito Creek near Searsville Lake. The nearest occurrence of this species is approximately 5 miles southeast, within Jasper Ridge Biological Preserve.	No further actions are recommended for this species.



BGEPA:	Bald and Golden Eagle Protection Act Species
FC:	Federal Candidate for Listing
FE:	Federal Endangered
FT:	Federal Threatened
SC:	State Candidate for Listing
SE:	State Endangered
SFP:	State Fully Protected Animal
SR:	State Rare
SSC:	State Species of Concern
ST:	State Threatened
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

Potential for Occurrence:

No Potential. Habitat on and adjacent to the site is clearly unsuitable for the species requirements (cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).

Unlikely. Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.

Moderate Potential. Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.

High Potential. All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.

Present. Species was observed on the site or has been recorded (i.e. CNDDDB, other reports) on the site recently.



APPENDIX D. SITE PLAN

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