

A P P E N D I X 4

BIOLOGICAL RESOURCES
ASSESSMENT



Biological Resources Assessment Draft San Vicente Redwoods Public Access Plan

SANTA CRUZ COUNTY, CALIFORNIA

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LIST OF ACRONYMS AND ABBREVIATIONS

BMP	Best Management Practice
CCA	California Coastal Act
CCR	California Code of Regulations
CDFG	California Department of Fish and Game (currently the CDFW)
CDFW	California Department of Fish and Wildlife (formerly the CDFG)
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
Corps	U.S. Army Corps of Engineers
CRLF	California Red-Legged Frog
CSRL	California Soil Resource Lab
DBH	Diameter at Breast Height
DPS	Distinct Population Segment
EFH	Essential Fish Habitat
ESA	Federal Endangered Species Act
ESU	Ecologically Significant Unit
Inventory	CNPS Inventory of Rare and Endangered Plants
LCP	Local Coastal Program
MBTA	Migratory Bird Treaty Act
NMFS	National Marine Fisheries Service
OWHM	Ordinary High Water Mark
PCE	Primary Constituent Element
PFMC	Pacific Fisheries Management Council
Rank	California Rare Plant Rank
RWQCB	Regional Water Quality Control Board
USFWS	U.S. Fish and Wildlife Service
WBWG	Western Bat Working Group
WRA	WRA, Inc.

EXECUTIVE SUMMARY

This report provides an analysis of natural community and special-status species issues for the proposed trail alignment associated with the Draft San Vicente Redwoods Public Access Plan (Draft Public Access Plan; PlaceWorks 2018) located in unincorporated Santa Cruz County, California. In December 2015, January, February, June, August, and October 2016, and May, June, and August 2017 WRA, Inc. (WRA) conducted a biological resources assessment within the Project Area for the proposed trail network. WRA observed 13 biological communities, 242 plant taxa and 18 wildlife taxa. Eleven sensitive biological communities were identified, including three sensitive aquatic communities. One special-status plant species and three special-status wildlife were determined to be present based on direct observations made by WRA or documented historical occurrences from the site. An additional 18 special-status plant species known from the region were originally determined to have potential to occur within the trail alignment. However, these plants were not observed within the trail alignment during seasonally timed rare plant surveys in 2016 and 2017, and it was subsequently determined that these species have low potential to occur within the proposed trail alignment, although they may have potential occur elsewhere on the property. An additional 13 special-status wildlife species known from the region were determined to have a moderate to high potential to occur within the proposed trail alignment or the immediate vicinity based on the presence of suitable habitat conditions and the proximity of known occurrences within the vicinity of the Project Area.

Although the proposed Project covers a large amount of land, the proposed Project itself is relatively minimal in nature. As a result of the intensive conservation and planning analyses conducted by the Project team, the proposed trail alignment and staging area have been designed to minimize impacts on the land and the sensitive resources found there. The proposed trail design has incorporated the best available design practices for trail construction and maintenance, reducing the potential for long-term adverse impacts related to erosion, sedimentation, and other issues that can arise from poor trail design. The trail network was designed to occupy only a small fraction of the land within the larger San Vicente Redwoods property, thereby providing ample untouched lands for plant and wildlife conservation. Moreover, the minimal nature of the proposed trail network and the activities that will be allowed there are by their very nature compatible with wildland conservation. With the implementation of the avoidance and minimization measures built into the project, WRA believes that all potential adverse impacts associated with the proposed Project can be reduced to a less-than-significant level.

1.0 INTRODUCTION

On multiple dates in December 2015, January, February, June, August, and October 2016, and May, June, and August 2017, WRA, Inc. (WRA) performed an assessment of biological resources for a proposed trail network within the approximately 8,532-acre San Vicente Redwoods property. The trail network is described in the Draft San Vicente Redwoods Public Access Plan (PlaceWorks 2018). The site is composed of two properties located in unincorporated Santa Cruz County, California (Figure 1). For the purpose of this report, the “main parcel” refers to the approximately 8,159-acre property located off of Empire Grade Road, and the “Laguna parcel” refers to the approximately 373-acre property located adjacent to the Bonny Doon Ecological Reserve. The “Project Area” refers to the alignment for the proposed trail network on both properties and an associated parking and staging area on the main parcel, adjacent to Empire Grade Road. The Project Area includes an approximately 50-foot buffer on either side of the trail alignment and around the parking and staging area (Figure 2).

The purpose of the assessment was to gather information necessary to complete a review of biological resources under the California Environmental Quality Act (CEQA) for the proposed trail network. This report describes the results of the site visit, which assessed the Project Area for the (1) potential to support special-status species and (2) presence of other sensitive biological resources protected by local, state, and federal laws and regulations. Special-status species observed during the site visit were documented and are discussed herein. Specific findings on the habitat suitability or presence of special-status species or sensitive habitats may require that protocol-level surveys be conducted. This report also contains an evaluation of potential impacts to special-status species and sensitive biological communities that may occur as a result of the proposed Project, including potential mitigation measures to compensate for any such impacts.

A biological resources assessment provides general information on the potential presence of sensitive species and habitats. The biological resources assessment is not an official protocol-level survey for listed species which may be required for Project approval by local, state, or federal agencies. This assessment is based on information available at the time of the study and on site conditions that were observed on the dates of the site visits.

Note to the Reader: All Figures referenced in the text are included in Appendix A.

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 Sensitive Biological Communities

Sensitive biological communities include habitats that fulfill special functions or have special values, such as wetlands, streams, riparian habitat, and sensitive terrestrial communities. These habitats are protected under federal regulations such as the Clean Water Act; state regulations such as the Porter-Cologne Act, the California Department of Fish and Wildlife (CDFW; formerly the California Department of Fish and Game [CDFG]) Streambed Alteration Program, and the CEQA; and/or local ordinances or policies such as Special Habitat Management Areas or General Plan Elements. Where these communities occur within the Coastal Zone, they may also be regulated under the California Coastal Act (CCA), as administered by the Santa Cruz County Local Coastal Program (LCP).

2.1.1 Clean Water Act Section 404

The U.S. Army Corps of Engineers (Corps) regulates “Waters of the United States” under Section 404 of the Clean Water Act. Waters of the U.S. are defined in the Code of Federal Regulations (CFR) as waters susceptible to use in commerce, including interstate waters and wetlands, all other waters (intrastate waterbodies, including wetlands), and their tributaries (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands as defined in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory 1987), are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Areas that are inundated at a sufficient depth and for a sufficient duration to exclude growth of hydrophytic vegetation are subject to Section 404 jurisdiction as “other waters” and are often characterized by an ordinary high water mark (OHWM). Other waters, for example, generally include lakes, rivers, and streams. The placement of fill material into Waters of the U.S generally requires an individual or nationwide permit from the Corps under Section 404 of the Clean Water Act. The Project Area is within the jurisdiction of the Corps’ San Francisco District.

2.1.2 Clean Water Act Section 401 and Porter-Cologne Water Quality Control Act

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 Regional Water Quality Control Board (RWQCB) protects all waters in its regulatory scope and has special responsibility for wetlands, riparian areas, and headwaters. These waterbodies have high resource value, are vulnerable to filling, and are not systematically protected by other programs. RWQCB jurisdiction includes “isolated” wetlands and waters that may not be regulated by the Corps under Section 404. Waters of the State are regulated by the RWQCB under the State Water Quality Certification Program which regulates discharges of fill and dredged material under Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act. Projects that require a Corps permit, or fall under other federal jurisdiction, and have the potential to impact Waters of the State, are required to comply with the terms of the Water Quality Certification determination. If a proposed project does not require a federal permit, but does involve dredge or fill activities that may result in a discharge to Waters of the State, the RWQCB has the option to regulate the dredge and fill activities under its state authority in the form of Waste Discharge Requirements. The Project Area is within the jurisdiction of the Central Coast RWQCB.

2.1.3 California Fish and Game Code Section 1600

Streams and lakes, as habitat for fish and wildlife species, are subject to jurisdiction by the CDFW under Sections 1600-1616 of California Fish and Game Code (CFG). Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term “stream”, which includes creeks and rivers, is defined in the California Code of Regulations (CCR) as “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). In addition, the term “stream” can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife (CDFG 1994). “Riparian” is defined as “on, or pertaining to, the banks of a stream.” Riparian vegetation is defined as “vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself” (CDFG 1994). Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from the CDFW. The Project Area is within the jurisdiction of the CDFW’s Bay Delta Region.

2.1.4 Essential Fish Habitat

Essential Fish Habitat (EFH) is regulated through the National Marine Fisheries Service (NMFS), a division of the National Oceanic and Atmospheric Administration. Protection of EFH is mandated through changes implemented in 1996 to the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) to protect the loss of habitat necessary to maintain sustainable fisheries in the United States. 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)]. The NMFS further defines Pacific coast salmon fishery essential fish habitat as "waters and substrate necessary for salmon production needed to support a long-term sustainable salmon fishery and salmon contributions to a healthy ecosystem" (Pacific Fisheries Management Council [PFMC] 1999). California salmonid species covered by this Fisheries Management Plan include Chinook salmon (*Oncorhynchus tshawytscha*) and Coho salmon (*O. kisutch*), and the EFH "must include all streams, lakes, ponds, wetlands, and other currently viable water bodies and most of the habitat historically accessible to salmon" in California (PFMC 1999). Under regulatory guidelines issued by the NMFS, any federal agency that authorizes, funds, or undertakes action that may affect EFH is required to consult with the NMFS (50 CFR 600.920).

The Project Area is located outside of viable areas to Chinook salmon and Coho salmon (as described in more detail in Section 4.2.2) and Project activities will be minimized to prevent downstream impacts to EFH (as described in Section 6.1.2). Therefore, while EFH was evaluated for the regulatory context of this Project; no further discussion of EFH is warranted.

2.1.5 CDFW Sensitive Terrestrial Communities

Sensitive terrestrial biological communities include terrestrial habitats that fulfill special functions or have special values. The CDFW ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in its California Natural Diversity Database (CNDDDB; CDFW 2016a). Sensitive plant communities are also identified by CDFW (CNPS 2016a, CDFW 2016b). CNDDDB vegetation alliances are ranked 1 through 5 based on NatureServe's (2010) methodology, with those alliances ranked globally (G; referred to herein as the "Global Rank") or statewide (S; referred to herein as the "State Rank") as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified by the CDFW must be considered and evaluated under the CEQA (CCR Title 14, Div. 6, Chap. 3, Appendix G). Specific habitats may also be identified as sensitive in city or county general plans or ordinances (see sections 2.1.6 and 2.1.7).

2.1.6 Sensitive Communities Identified by Santa Cruz County Code

Chapter 16 of the Santa Cruz County Code pertains to the protection of natural resources, and includes sections relating to topics such as grading regulations, erosion control, and water quality control, among others. The sections of Chapter 16 which are relevant to the Project are summarized as follows:

Riparian Corridor and Wetlands Protection

County approval is required for projects that may result in impacts to "riparian corridors." In Chapter 16.30, a riparian corridor is defined as:

- (1) *Lands within a stream channel, including the stream and the area between the mean rainy season (bankfull) flowlines;*

- (2) *Lands extending 50 feet (measured horizontally) out from each side of a perennial stream. Distance shall be measured from the mean rainy season (bankfull) flowline;*
- (3) *Lands extending 30 feet (measured horizontally) out from each side of an intermittent stream. Distance shall be measured from the mean rainy season (bankfull) flowline;*
- (4) *Lands extending 100 feet (measured horizontally) from the high water mark of a lake, wetland, estuary, lagoon or natural body of standing water;*
- (5) *Lands within an arroyo located within the urban services line, or the rural services line;*
- (6) *Lands containing a riparian woodland.*

Sensitive Habitat Protection

County approval is required for projects that may result in impacts to “sensitive habitat.” Chapter 16.32 includes the following definition of a “sensitive habitat”:

- (1) *Areas of special biological significance as identified by the State Water Resources Control Board.*
- (2) *Areas which provide habitat for locally unique biotic species/communities including but not limited to: oak woodlands, coastal scrub, maritime chaparral, native rhododendrons and associated Elkgrass, indigenous Ponderosa Pine, indigenous Monterey Pine, mapped grassland in the Coastal Zone and sand parkland; and special forests including San Andreas Oak Woodlands, indigenous Ponderosa Pine, indigenous Monterey Pine and ancient forests.*
- (3) *Areas adjacent to essential habitats of rare, endangered or threatened species as defined in subsections (5) and (6) of this definition.*
- (4) *Areas which provide habitat for species of special concern as listed by the California Department of Fish and Game in the special animals list, natural diversity database.*
- (5) *Areas which provide habitat for rare or endangered species which meet the definition of Section 15380 of the California Environmental Quality Act guidelines.*
- (6) *Areas which provide habitat for rare, endangered or threatened species as designated by the State Fish and Game Commission, United States Fish and Wildlife Service or California Native Plant Society.*
- (7) *Nearshore reefs, rocky intertidal areas, sea caves, islets, offshore rocks, kelp beds, marine mammal hauling grounds, sandy beaches, shorebird roosting, resting and nesting areas, cliff nesting areas and marine, wildlife or educational/research reserves.*
- (8) *Dune plant habitats.*
- (9) *All lakes, wetlands, estuaries, lagoons, streams and rivers.*

(10) Riparian corridors.

County code allows for limited uses within these sensitive habitats, including nature study and research and hunting, fishing, and equestrian trails that have no adverse impact on the species or habitat. Although no hunting or fishing will be allowed on the site, the proposed use of the site for pedestrian, bicycle, and equestrian trails is in line with the spirit of the County code.

Development within any sensitive habitat area is subject to the following conditions:

- *All development shall mitigate significant environmental impacts, as determined by the Environmental Coordinator.*
- *Dedication of an open space or conservation easement or an equivalent measure shall be required as necessary to protect the portion of a sensitive habitat which is undisturbed by the proposed development activity or to protect a sensitive habitat on an adjacent parcel.*
- *Restoration of any area which is a degraded sensitive habitat or has caused or is causing the degradation of a sensitive habitat shall be required; provided, that any restoration required shall be commensurate with the scale of the proposed development.*

2.1.7 Environmentally Sensitive Habitats Identified by the Santa Cruz County Local Coastal Program

The County of Santa Cruz Local Coastal Program (LCP; County of Santa Cruz 1994) defines Environmentally Sensitive Habitats protected under the California Coastal Act in the unincorporated portions of Santa Cruz County. In addition to areas shown on County General Plan and LCP Resources and Constraints Maps, the LCP considers all of the habitats listed above in Section 2.1.6 as Environmentally Sensitive Habitats for purposes of the California Coastal Act. The LCP also identifies a number of specific special-status plant and wildlife species, the habitat for which constitutes Environmentally Sensitive Habitat.

The LCP regulates development and other activities within and adjacent to Environmentally Sensitive Habitats and defines required buffers or setbacks from such habitats. The LCP defines allowed uses within Environmentally Sensitive Habitats and their buffers and specifically identifies “non-motorized recreation and pedestrian trails” as an allowed use compatible with riparian habitat. Because the Santa Cruz County LCP is contained within their General Plan, many of the LCP protections over Environmentally Sensitive Habitats within the Coastal Zone are aligned with the County Code regarding sensitive biological resources and implementation of the LCP is through the Riparian Corridor and Wetlands Protection Ordinance (16.30) and the Sensitive Habitat Ordinance (16.32) (see Section 2.1.6).

2.2 Special-Status Species

2.2.1 Special-Status Plants and Wildlife

Special-status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the Federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA). These acts afford protection to both listed species and those that are formal candidates for listing. In addition, CDFW Species of Special Concern, CDFW California Fully Protected species, USFWS Birds of Conservation Concern, and CDFW Special-Status Invertebrates are all considered special-status

species. Although these aforementioned species generally have no special legal status, they are given special consideration under the CEQA. Bat species are also evaluated for conservation status by the Western Bat Working Group (WBWG), a non-governmental entity. Bats listed as a “High Priority” or “Medium Priority” species for conservation by the WBWG are typically considered special-status and are considered under the CEQA. In addition to regulations for special-status species, most birds in the United States, including non-special-status native species, are protected by the Migratory Bird Treaty Act of 1918 (MBTA) and the CFGC, i.e., sections 3503, 3503.5 and 3513. Under these laws, destroying active bird nests, eggs, and/or young is illegal.

Plant species on the California Native Plant Society (CNPS) Rare and Endangered Plant Inventory (Inventory) with California Rare Plant Ranks (Rank; formerly known as CNPS “Lists”) of 1 and 2 are also considered special-status plant species and must be considered under the CEQA. Rank 3 and Rank 4 species are afforded little or no protection under the CEQA, but are included in this analysis for completeness.

Table 1. Description of California Rare Plant Ranks and Threat Codes

California Rare Plant Ranks	
Rank 1A	Presumed extirpated in California and either rare or extinct elsewhere
Rank 1B	Rare, threatened, or endangered in California and elsewhere
Rank 2A	Presumed extirpated in California, but more common elsewhere
Rank 2B	Rare, threatened, or endangered in California, but more common elsewhere
Rank 3	Plants about which more information is needed - A review list
Rank 4	Plants of limited distribution - A watch list
Threat Ranks	
0.1	Seriously threatened in California
0.2	Moderately threatened in California
0.3	Not very threatened in California

2.2.2 Critical Habitat

Critical habitat is a term defined in the ESA as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. The ESA requires federal agencies to consult with the USFWS to conserve listed species on their lands and to ensure that any activities or projects they fund, authorize, or carry out will not jeopardize the survival of a threatened or endangered species. In consultation for those species with critical habitat, federal agencies must also ensure that their activities or projects do not adversely modify critical habitat to the point that it will no longer aid in the species’ recovery. In many cases, this level of protection is similar to that already provided to species by the ESA jeopardy standard. However, areas that are currently unoccupied by the species but which are needed for the species’ recovery are protected by the prohibition against adverse modification of critical habitat.

2.3 Protected Trees

Chapter 16 of the Santa Cruz County Municipal Code outlines policies for the protection of significant trees within the unincorporated portions of the County. County approval is required for projects that may result in impacts to "significant trees." Per Chapter 16.34, a permit is needed for trees within the Coastal Zone that meet Definitions 1 or 2, below. A permit is also needed for trees within Sensitive Habitat (Definition 3).

1. *Within the Urban Services Line or Rural Services Line, any tree which is equal to or greater than 20 inches d.b.h. (approximately 5 feet in circumference); any sprout clump of five or more stems each of which is greater than 12 inches d.b.h. (approximately 3 feet in circumference); or any group consisting of five or more trees on one parcel, each of which is greater than 12 inches d.b.h. (approximately 3 feet in circumference).*
2. *Outside the Urban Services Line or Rural Services line, where visible from a scenic road, any beach, or within a designated scenic resource area, any tree which is equal to or greater than 40 inches d.b.h. (approximately 10 feet in circumference); any sprout clump of five or more stems, each of which is greater than 20 inches d.b.h. (approximately 5 feet in circumference); or, any group consisting of ten or more trees on one parcel, each greater than 20 inches d.b.h. (approximately 5 feet in circumference).*
3. *Any tree located in a sensitive habitat as defined in Chapter 16.32. Also see Section 16.34.090(c), exemption of projects with other permits.*

The following work is exempted from all provisions of Chapter 16.34 :

- (A) *Timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provisions of the Z'berg-Nejedly Forest Practices Act of 1973 (commencing with Section 4511).*
- (B) *Any activity done pursuant to a valid timber harvest permit, or a notice of timber harvesting, approved pursuant to Chapter 16.52 SCCC.*
- (C) *Any tree removal authorized pursuant to a valid discretionary permit approved pursuant to Chapter 13.10 (Zoning Regulations), Chapter 13.20 (Coastal Zone Regulations), Chapter 14.01 (Subdivision Regulations), Chapter 16.20 (Grading Regulations), Chapter 16.22 (Erosion Control), Chapter 16.30 (Riparian Corridor and Wetlands Protection), Chapter 16.32 (Sensitive Habitat Protection), or Chapter 16.54 SCCC (Mining Regulations).*
- (D) *Removal of tree crops pursuant to agricultural operations. [Ord. 3443 § 1, 1983; Ord. 3341 § 1, 1982].*

3.0 METHODS

On December 16-17, 2015; January 20-22, February 10-12, June 15-16, August 15-17, August 24-25, and October 21, 2016; and May 30-June 1, and August 8-9, 2017 the Project Area was traversed on foot to determine (1) plant communities present within the Project Area, (2) whether existing conditions may provide suitable habitat for any special-status plant or wildlife species, and (3) whether sensitive habitats are present. In addition, these surveys included a comprehensive mapping of San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*)

middens and seasonally timed surveys for special-status plants. The Project Area for the assessment was defined to include the proposed trail alignment plus an approximately 50-foot buffer on both sides, as well as the proposed parking area adjacent to Empire Grade Road and a 50-foot buffer (Figure 2).

All plant and wildlife species encountered were recorded and are listed in Appendix B. Plant nomenclature follows Baldwin et al. (2012) and subsequent revisions by the Jepson Flora Project (2017), except where noted. Because of recent changes in classification for many of the taxa treated by Baldwin et al. and the Jepson Flora Project, relevant synonyms are provided in brackets. For cases in which regulatory agencies, CNPS, or other entities base rarity on older taxonomic treatments, precedence was given to the treatment used by those entities.

3.1 Biological Communities

Prior to the site visit, an online soil survey of the Project Area (California Soil Resource Lab 2016) was examined to determine whether any unique soil types that could support sensitive plant communities and/or aquatic features are present in the Project Area. In addition, aerial imagery (Google Earth) of the Project Area was reviewed to determine where sensitive landscape features may occur. Biological communities present in the Project Area were classified based on existing plant community descriptions described in the *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986) and *A Manual of California Vegetation, Online Edition* (CNPS 2016a). However, in some cases it was necessary to identify variants of community types or to describe non-vegetated areas that are not described in the literature.

Mapping of plant communities relied on a high-level analysis of the site based on data from CalVeg (U.S. Forest Service 2009) which were augmented by local experts and the Land Trust of Santa Cruz County to document important local habitats such as sandhills, sandhill parklands, and stands of the Federal Endangered Santa Cruz cypress (*Hesperocyparis abramsiana* var. *abramsiana*) and to reflect the boundaries of urban and cultivated lands (ESA 2012). WRA did not refine the mapping of biological communities; however, WRA did note the occurrence of any sensitive biological communities within the Project Area (see Section 3.1.2). Sensitive biological communities with discrete boundaries (e.g., wetlands and streams) were mapped in the field; however, sensitive communities lacking discrete boundaries (e.g., forest types) were not mapped. Instead, the assessment focused on developing avoidance and minimization measures to prevent adverse impacts to such communities. Biological communities observed within the Project Area were classified as sensitive or non-sensitive as defined by the CEQA and other applicable laws and regulations (see below).

3.1.1 Non-Sensitive Biological Communities

Non-sensitive biological communities are those communities that are not afforded special protection under the CEQA or other state, federal, or local laws, regulations or ordinances. These communities may, however, provide suitable habitat for some special-status plant or wildlife species and are identified or described in Section 4.1.1 below.

3.1.2 Sensitive Biological Communities

Sensitive biological communities are defined as those communities that are given special protection under the CEQA or other applicable federal, state, or local laws, regulations or ordinances. Applicable laws and ordinances are discussed above in Section 2.0. Special methods used to identify sensitive biological communities are discussed below.