



Rincon Consultants, Inc.

250 East 1st Street, Suite 1400
Los Angeles, California 90012

213 788 4842
FAX 908 2200

info@rinconconsultants.com
www.rinconconsultants.com

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Project No: 18-07013

Robert Sun, Principal Planner
Willdan Engineering
13191 Crossroads Parkway North, Suite 405
Industry, California 91746
Via email: rsun@willdan.com

Subject: Biological Resources Assessment for the Long Valley Road/Valley Circle/U.S. 101 On-Ramp Improvement Project, Cities of Los Angeles and Hidden Hills, Los Angeles County, California

Mr. Sun,

This report documents the findings of a Biological Resources Assessment (BRA) conducted by Rincon Consultants, Inc. (Rincon), for the proposed Long Valley Road/Valley Circle/U.S. 101 On-Ramp Improvement Project (project) in the cities of Los Angeles and Hidden Hills, Los Angeles County, California. The purpose of this BRA is to address the status and condition of special-status biological resources and rare, threatened, and endangered species with the potential to occur at the project site or be affected by the proposed improvement activities.

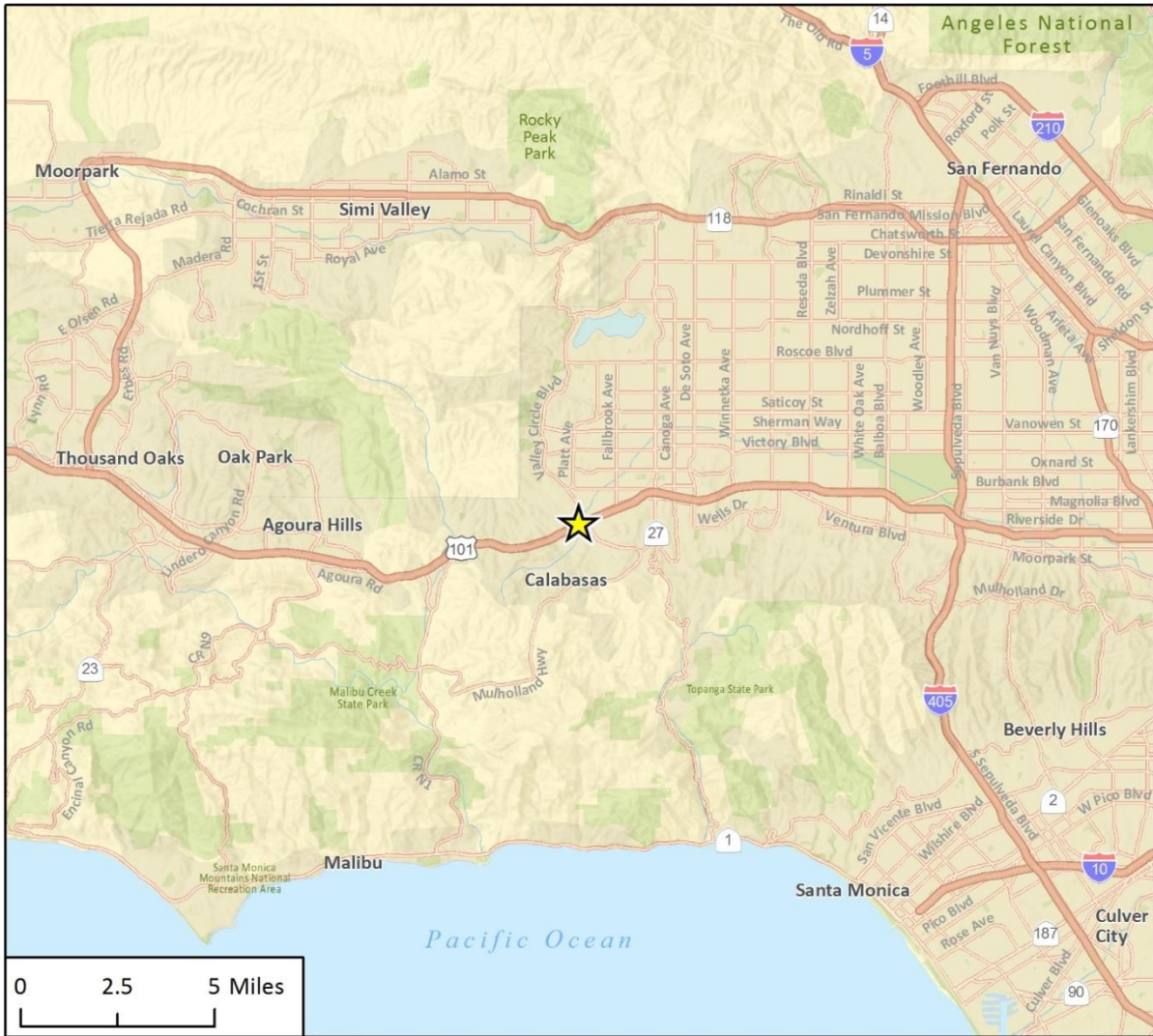
The project impacts, regulations, and mitigation measures are discussed in accordance with the California Environmental Quality Act (CEQA) and anticipated environmental review related to the project. The City of Hidden Hills (City) is the lead agency under CEQA.

Project Description, Location and Geographical Setting

The project site is in the southeastern portion of Hidden Hills and on the southwestern edge of the San Fernando Valley in the southern Simi Hills Transverse Range. The project is an approximate 2.57-acre area located along Long Valley Road, extending from the Long Valley Road entrance to the Hidden Hills Community (Community), and continuing approximately 500 feet north along the west side of Valley Circle Boulevard. The project includes two dirt lots on either side of Long Valley Road, one which is located directly northeast of the guard house at the entrance to the Community, and one which is located approximately 100 feet southeast of the guardhouse. The project site is north of the U.S.-101 Freeway (Figure 1). The property is identified as Assessor's Parcel Numbers (APNs) 204-700-1005, 204-901-844, 204-901-852, 204-901-857, and 204-901-8901. The project site is depicted on Township 1N, Range 17W, Section 23, of the U.S. Geological Survey (USGS) *Calabasas, California 7.5-Minute Quadrangle* (Figure 2). The western half of the project is located in the city of Hidden Hills, and the eastern half is located in the city of Los Angeles, as shown in Figure 3.

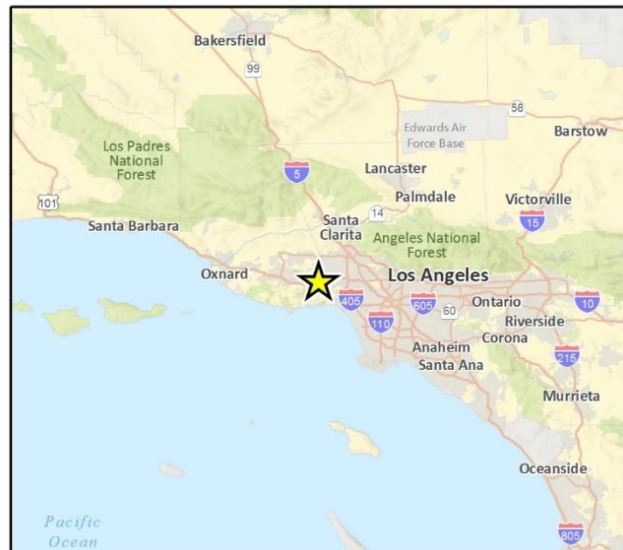


Figure 1 Regional Location



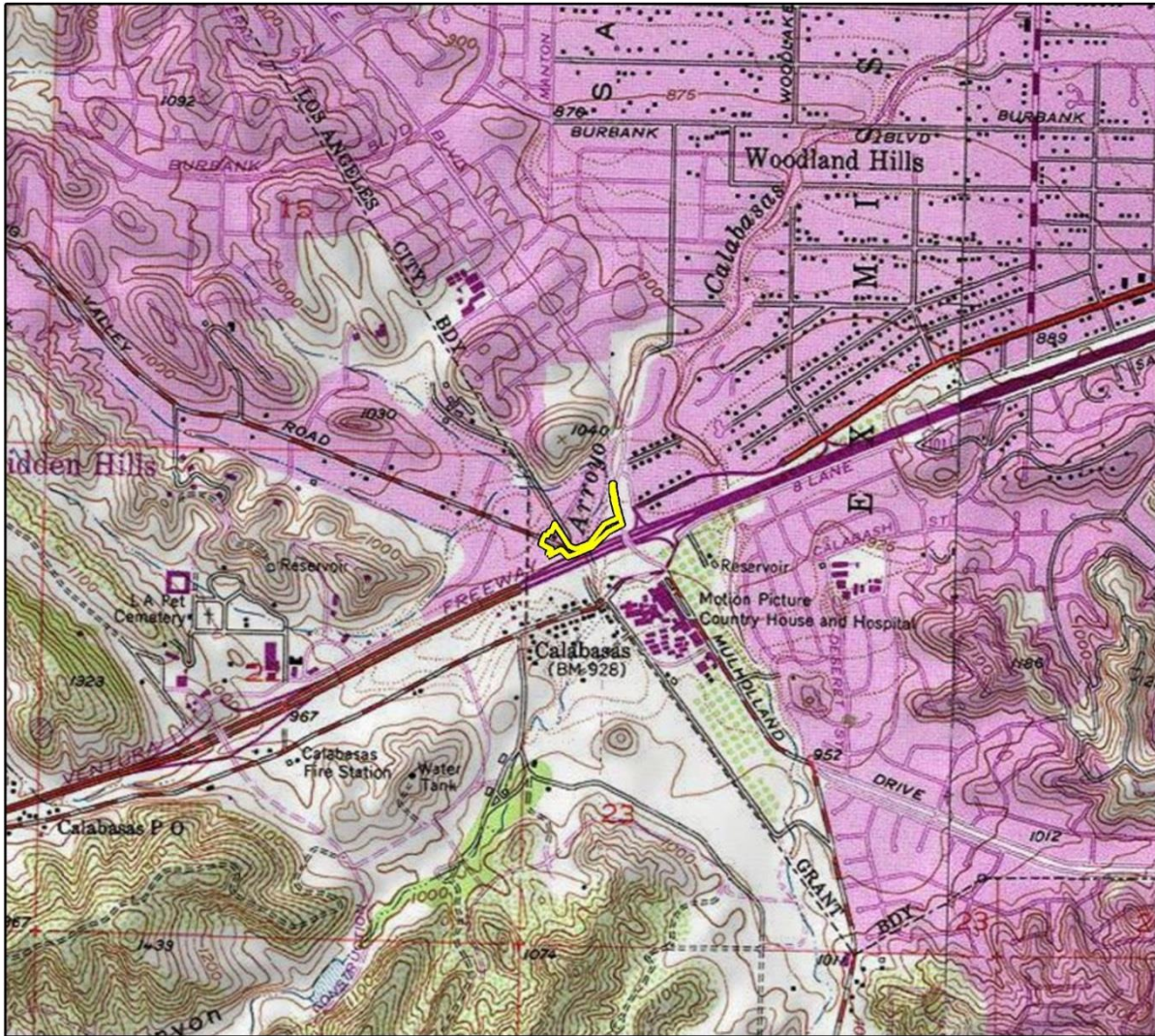
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★ Project Location

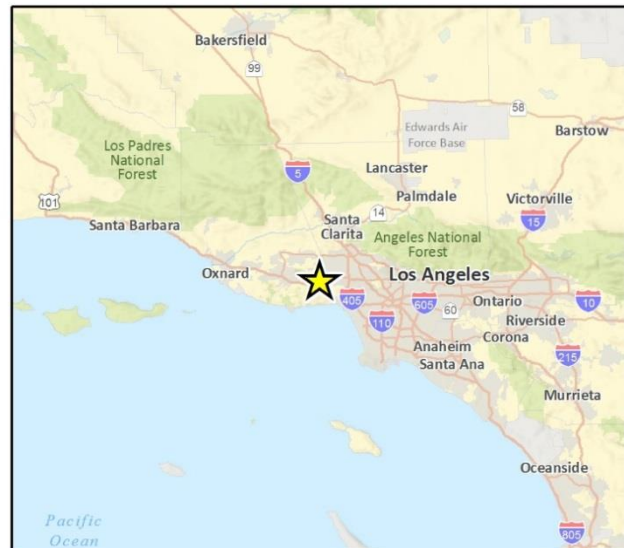
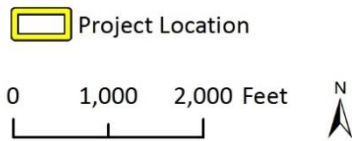


CRFfig X Regional Location Map

Figure 2 Project Location



Imagery provided by National Geographic Society, Esri and its licensors © 2019. Calabasas Quadrangle. T01N R17W S23. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.



CRFig 1 Proj Locn Map

Figure 3 Project and City Boundaries



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FigX Project and City Boundaries



Project Description

The proposed project consists of easing traffic congestion at the Long Valley Road and Valley Circle Boulevard/U.S. 101 on-ramp intersection, improving pedestrian access on Long Valley Road and Valley Circle Boulevard, and improving vehicle access and queuing at the gate entry with proposed improvements for a new parking lot to accommodate a staging and prescreening area adjacent to the guard house. Specific project components are described below, along with anticipated construction activities.

Project components include:

- Roadway and sidewalk improvements (drainage, right-of-way [ROW] acquisition)
- Parking lot improvements (landscaping, irrigation)
- Guard house and gate access (island median modifications)

Roadway and Sidewalk Improvements

To reduce traffic congestion and improve traffic flow/access at the Long Valley Road entry gate, the project would construct a new westbound right-turn lane at the Long Valley Road and U.S. 101 on-ramp intersection. Approximately 1,200 square feet of additional street right-of-way would be required along the north side of Long Valley Road to accommodate this roadway improvement. The proposed ROW acquisition would require a ten-foot wide strip extending approximately 240 feet along Long Valley Road.

To enhance pedestrian safety and access to retail shops on Valley Circle Boulevard/Mullholland Drive, new sidewalk improvements will be installed along the north side of Long Valley Road and extend to the west side of Valley Circle Boulevard. The sidewalk improvements will be five feet wide and 660 linear feet along Long Valley Road, which will transition to ten-foot wide along Valley Circle Boulevard for approximately 380 linear feet, terminating at a marked crosswalk at the Ventura Boulevard intersection. To accommodate the new sidewalk on Long Valley Road, a four-foot high retaining wall will be installed to maintain pedestrian access adjacent to the sloping property from the nursery; it will extend for approximately 250 linear feet from the intersection of Long Valley Road and Valley Circle Boulevard. Based on the existing topography, change in elevation from the start of the sidewalk at the guard house to its end on Valley Circle Boulevard will be approximately 105 feet. The new sidewalk will also cross over an existing box culvert, located midway along Long Valley Road. The majority of the roadway and parkway improvement will be constructed within Los Angeles, with a small portion in Hidden Hills.

Parking Lot and Staging Area

The project will include development of a parking lot and vehicle staging area on a vacant parcel to the east of the guard house and gate entry. The approximate 0.44-acre triangular-shaped lot is on the north side of Long Valley Road and within the City of Hidden Hills; a commercial nursery is present to the east and single-family homes to the west. The parcel is generally flat and unpaved with several mature native oak trees on its western portion adjacent to Long Valley Road. This parcel is mostly disturbed with minimal vegetation due to vehicle access and activities related to the adjacent nursery. Development of the vacant parcel would consist of 16 parking spaces (14 standard spaces and 2 handicapped spaces), pedestrian access, staging area for vehicle queuing, curb and gutter, paving and preservation of existing oak trees with the addition of new trees, landscaping and landscape features.



In addition to the above, the proposed parking lot improvements would include reconfiguration of an existing parking area located along the south side of Long Valley Road. These improvements would relocate the existing 7 parking spaces along Long Valley Road and construct an approximately 0.4-acre new parking lot to allow vehicle ingress and egress without conflicting with traffic on Long Valley Road. Proposed improvements would consist of 11 parking spaces (8 standard spaces with six spaces in stacked parking configuration, 2 compact spaces and 1 handicapped space), pedestrian access, curb and gutter, paving, and preservation of existing oak trees with the addition of new trees and landscaping.

Guard House and Gate Entry

A new guard house and entry gates will replace the existing ones and be located easterly approximately 12 feet to the east of their current position. This relocation is designed to accommodate U-turn movements at the guard house and provide efficient access from the adjacent parking areas. The new guard house and gate entry will also be widened to provide two ingress lanes; the lane adjacent to the guard house will be actuated by an attendant for visitors and a separate outside lane will be actuated automatically with an electronic pass key for residents only. These improvements are anticipated to require an additional 12 feet of street width.

Construction Phasing and Schedule

The project will be completed in two phases. Phase one will encompass improvements within Hidden Hills. Phase two will involve improvements outside the city. Considering the sensitivity of the project timing and the amount of time required for processing approvals from various agencies, the improvements within the city's limits (Phase One) will be completed first. Phase One improvements will include the parking lot, pavement improvements, striping, and signage and potential inclusion of the guard house relocation, traffic turn-around, and additional parking lot across the street. Such improvements will be limited to shallow excavation where any ground disturbance would not exceed two feet below existing grade. General construction activities will involve grading, paving, landscape, irrigation, striping, concrete construction and potentially drilling for water quality.

It is anticipated that construction of the project would commence in the Summer of 2019 and last approximately six months. Assuming this construction time frame, the proposed project would be completed by December 2019.

Project Plans

The conceptual drawings for the project were provided to Rincon by the Applicant on February 14, 2019 as a portable document format (PDF); and the overall project limits were provided on April 1, 2019 as a computer-aided design (CAD) file. The overall project improvement limits were used for the biological reconnaissance survey and impact analysis. An impact analysis has therefore been provided below.

Methodology

Regulatory Overview

Regulated or sensitive resources studied and analyzed herein include special-status plant and wildlife species, nesting birds and raptors, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement, and locally protected resources, such as protected trees. For the purpose of this report, potential impacts to biological resources were analyzed based on the following statutes:



Federal

- Federal Endangered Species Act (ESA)
- Federal Clean Water Act (CWA)
- Migratory Bird Treaty Act (MBTA)
- The Bald and Golden Eagle Protection Act

State

- California Environmental Quality Act (CEQA)
- California Endangered Species Act (CESA)
- California Fish and Game Code (CFGC)
- Porter-Cologne Water Quality Control Act

Local

- Title 5 Chapter 8 of the City of Hidden Hills municipal code regulating native oak trees and historical trees
- City of Los Angeles General Plan (2001)
- County of Los Angeles General Plan (2015)
- City of Los Angeles Protected Tree Ordinance (2006b)

Guidelines for Determining CEQA Significance

The following threshold criteria, as defined by the CEQA Guidelines Appendix G Initial Study Checklist, were used to evaluate potential environmental effects. Based on these criteria, the proposed project would have a significant effect on biological resources if it would:

- a) *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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.*
- b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.*
- c) *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal areas, etc.) through direct removal, filling, hydrological interruption, or other means.*
- d) *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.*
- e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.*
- f) *Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional or state habitat conservation plan.*



Literature Review

A literature review was conducted to establish the environmental and regulatory setting of the proposed project. Specific literature reviewed for the subject analysis is provided in the references section of this document. The reviewed literature also included the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2019), and literature detailing the habitat requirements of subject species. Aerial photographs, topographic maps, and soil survey maps were also examined.

Queries of the United States Fish and Wildlife Service (USFWS) Environmental Conservation Online System (ECOS): Information, Planning and Conservation System (IPaC) (USFWS 2019a), USFWS Critical Habitat Portal (USFWS 2019b), USFWS National Wetland Inventory (NWI) (USFWS 2019c), California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (CDFW 2018a), CDFW Biogeographic Information and Observation System (BIOS) (CDFW 2019b), and California Native Plant Society (CNPS) *Online Inventory of Rare, Threatened and Endangered Plants of California* (CNPS 2019) were conducted. The queries were conducted to obtain comprehensive information regarding state and federally listed species, sensitive communities and federally designated Critical Habitat known to or considered to have potential to occur within the vicinity of the project site.

Field Reconnaissance Survey

The field reconnaissance survey was limited to providing an overview of site biological constraints and the potential presence of sensitive biological resources, including sensitive plant and wildlife species, sensitive plant communities, jurisdictional waters and wetlands, protected trees, wildlife movement, and habitat for nesting birds. The Study Area consisted of the approximate 2.57-acre project site and a 20-foot surrounding buffer.

An initial field reconnaissance survey was conducted by Rincon Senior Biologist Michael Cady on February 21, 2019 from 12:15 pm to 2:15 pm. A subsequent field reconnaissance survey was conducted by Rincon Associate Biologists Yuling Huo and Justin MacMartin on April 3, 2019 from 2:00 pm to 4:00 pm. The surveys were performed by walking the proposed work site to characterize the existing biological resources present (e.g., vegetation communities, potential presence of sensitive species and/or habitats, and presence of potentially jurisdictional waters). Where portions of the Study Area were inaccessible on foot (e.g., private property and fenced areas), the biologists visually inspected these areas with binoculars (10 x 42). Weather conditions during the survey included an average temperature of 70 degrees Fahrenheit, with winds between 2 and 4 miles per hour and partially cloudy skies. Mr. Cady, Ms. Huo and Mr. MacMartin recorded all biological resources encountered within the Study Area.

During the survey, an inventory of all plant and animal species observed was compiled (Attachment A). Plant species nomenclature and taxonomy follows *The Jepson Manual: Vascular Plants of California, Second Edition* (Baldwin et al., 2012), and the Jepson Online Interchange for California Floristics (Jepson Flora Project, 2019). All species encountered were noted and identified to the lowest possible taxonomic level. Vegetation mapping and classification used for this analysis is based on the classification system provided in *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009) but modified as needed to most accurately describe the existing vegetation communities on-site.

The habitat requirements for each regionally occurring special-status species were assessed and compared to the type and quality of the habitats observed within the Study Area during the site visit. The survey was conducted to make an initial determination regarding the presence or absence of terrestrial biological resources including plants, birds and wildlife.



Based on the results of the site visit, literature review, and species known to occur regionally, Rincon biologists assessed the potential for the proposed project to impact special-status species within the Study Area. The potential presence of special-status species is based on the site visit and literature review and is intended to assess habitat suitability within the Study Area only. Definitive surveys to confirm the presence or absence of special-status species were not performed and are not included within this analysis. The findings and opinions conveyed in this report are based on the methodology described above.

Existing Conditions

Physical Characteristics

The approximate 2.5-acre project site is within a developed/disturbed urban area. The site is largely comprised of a portion of Long Valley Road and the western right-of-way of Valley Circle Boulevard and is surrounded by a plant nursery to the north, residential development to the west and the U.S. Highway 101 to the south.

The project site is in a developed urban area on alluvial fan and floodplain remnants, where the landform sits at approximately 285 meters (925 feet) above mean sea level. The Study Area historically contained two soil types: Conejo-Urban land complex, 0 to 2 percent slopes, MLRA 19 (110) and Cropland-Urban land complex, 2 to 9 percent slopes (NRCS, 2019). These consist of very deep, moderately well to well drained soils formed in alluvium from mixed rock sources, including basic igneous and sedimentary rocks (California Soil Resource Lab 2019).

Hydrology

The nearest water source is Arroyo Calabasas, a tributary to the Los Angeles River; it is located approximately 0.17 mile (935 feet) to the northeast. A drainage is located approximately 400 feet southwest of the intersection of Long Valley Road and Valley Circle Boulevard. The portion of the drainage under Long Valley Road is a concrete channel, but the portion north of Long Valley Road has an earthen bottom. A low flow of water was present in the drainage and may be providing a water source to the surrounding oak trees in that area.

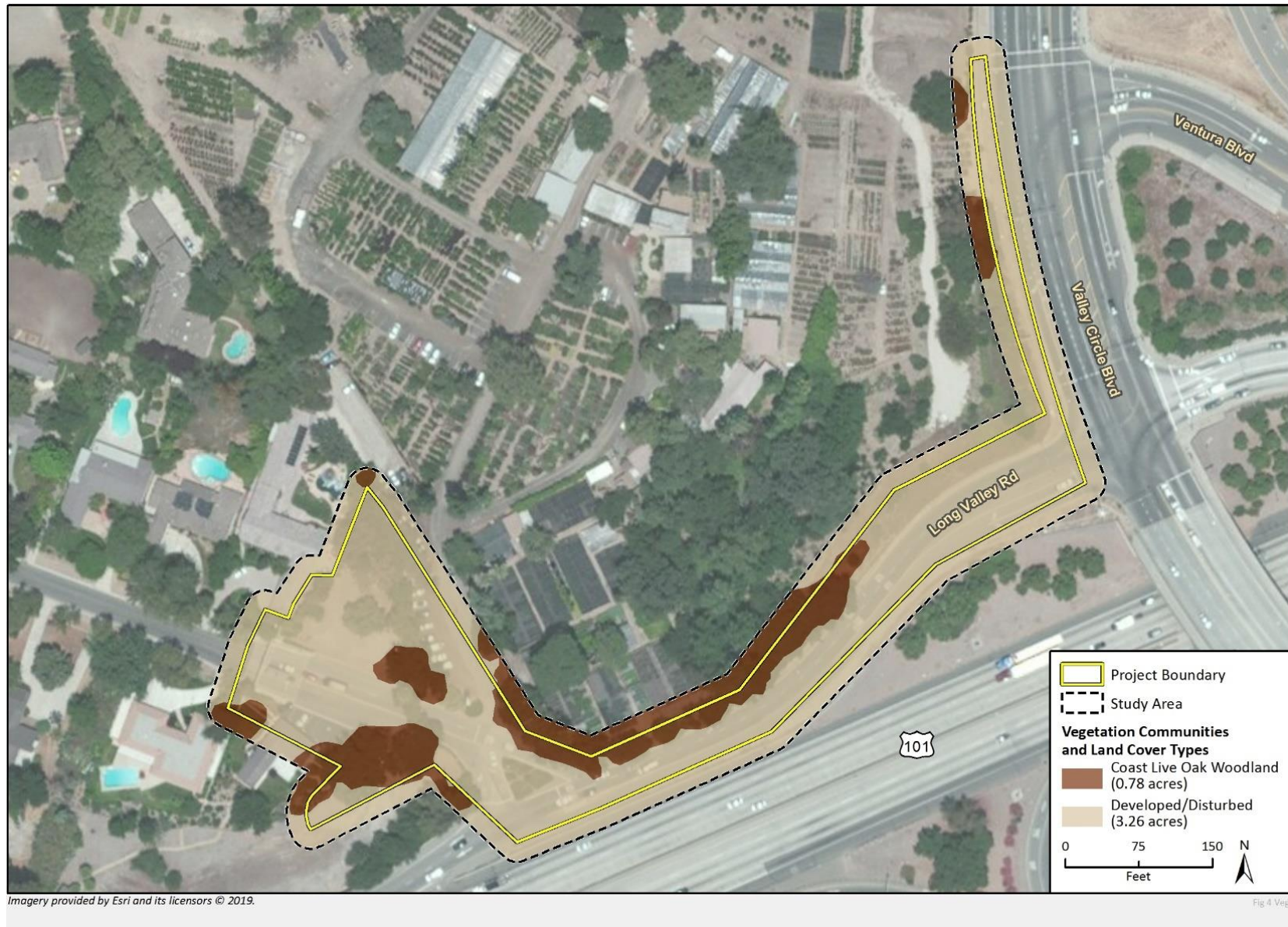
Vegetation

Two vegetation communities occur within the Study Area: Coast Live Oak Woodland Alliance (hereafter, disturbed coast live oak woodland) and Developed/Disturbed (Figure 4). Disturbed coast live oak woodland within the Study Area is almost entirely comprised of coast live oak (*Quercus agrifolia*), but also includes valley oak (*Quercus lobata*). Developed/disturbed areas on-site are primarily comprised of paved roads (Long Valley Road and Valley Circle Boulevard) and are also comprised of dirt lots adjacent to the paved roads. Ornamental vegetation is included in the Developed/Disturbed category. A total of 25 plant species were observed within the Study Area during the site reconnaissance surveys (Attachment A). The two vegetation communities present on-site are discussed in more detail below:

Disturbed Coast Live Oak Woodland

Disturbed coast live oak woodland comprises approximately 0.78 acre within the Study Area. The understory of this community is comprised of paved roads, sidewalk, chain-link fences, landscape planters, dirt lots and weedy vegetation. Disturbed coast live oak woodland also occurs in narrow bands within the Study Area, which limits habitat suitability for woodland-associated organisms.

Figure 4 Vegetation Communities





Developed/Disturbed

Developed land includes areas that have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. It is characterized by paved roads, hardscape, and landscaped areas. Disturbed habitats have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or naturalized vegetation association but continue to retain a soil substrate. A limited amount of native vegetative species is present within disturbed areas on-site.

Developed/disturbed habitat includes approximately 3.26 acres within the Study Area. Ornamental trees within the Study Area include Brazilian pepper tree (*Schinus terebinthifolius*), Canary Island pine (*Pinus canariensis*), coast redwood (*Sequoia sempervirens*) (a California native species but not known to naturally occur in the project region), eucalyptus (*Eucalyptus* sp.), fan palm (*Washingtonia* sp.), Chinese privet (*Ligustrum lucidum*), Peruvian pepper tree (*Schinus molle*) and shiny xylosma (*Xylosma congestum*). Other species present within this land cover type in the Study Area include oleander (*Nerium oleander*), lupine (*Lupinus* sp.), California brittlebush (*Encelia californica*), lemonade berry (*Rhus integrifolia*), coyote brush (*Baccharis pilularis*) and laurel sumac (*Malosma laurina*).

General Wildlife

The Study Area supports common wildlife adapted to urban and suburban areas (e.g., raccoon [*Procyon lotor*], striped skunk [*Mephitis mephitis*], and a variety of common avian species). Wildlife species observed directly or detected from calls, tracks, scat, nests, or other signs were documented. The detection of wildlife species was limited by seasonal and temporal factors. Given the project site's history of disturbance and lack of connectivity with larger expanses of natural habitat, it is unlikely that the site would support most special-status species. Some of the wildlife species detected within the Study Area include dark-eyed junco (*Junco hyemalis*), rock pigeon (*Columba livia*), cedar waxwing (*Bombycilla cedrorum*), western gray squirrel (*Sciurus griseus*) and western fence lizard (*Sceloporus occidentalis*). Wildlife species observed during the survey are included in Attachment B.

Nesting Birds and Roosting Bats

Established native and ornamental trees in the survey area could provide nesting areas for common nesting birds protected under the CFGC Section 3503 and the MBTA. Nesting birds, however, were not observed during the survey.

The mature native and ornamental trees within the Study Area and the native trees within the drainage to the north of the project site could also provide roosting habitat for various bat species. Evidence of roosting bats, however, including individual bats or guano, was not observed during the site survey.

Sensitive Biological Resources

Based on review of aerial photographs and the April 3, 2019, field reconnaissance survey, Rincon evaluated the potential presence of sensitive biological resources on and adjacent to the Study Area.

Special-status Species

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS under the Federal ESA; those considered "Species of Concern" by the USFWS; those listed or candidates for listing as Rare, Threatened, or Endangered by the CDFW under the CESA; animals designated as "Fully Protected" by the CFGC; animals listed as "Species



of Special Concern” (SSC) by the CDFW; CDFW Special Plants, specifically those with California Rare Plant Ranks (CRPR) of 1B, 2, 3, and 4 in the CNPS’s Inventory of Rare and Endangered Vascular Plants of California (CNPS 2018); and birds identified as sensitive or watch list species by the Los Angeles County Sensitive Bird Species Working Group (2009).

Local, state, and federal agencies regulate special-status species and may require an assessment of their presence or potential presence to be conducted onsite prior to the approval of proposed development on a property. This section discusses sensitive biological resources observed on the project site and evaluates the potential for the project site to support other sensitive biological resources. A list of special-status plant and animal species with potential to occur onsite was developed based on a review of a 5-mile search of the CNDDDB (2019b) and a 9-quad search of the CNPS’s online Inventory of Rare and Endangered Vascular Plants of California (CNPS 2019) and can be found in Attachment B – Table 1. These search areas were determined based on the surrounding urban and residential land uses and significant change in habitat types outside of this area (e.g., desert habitats that are not relevant to the project site). Assessments for the potential occurrence of special-status species are based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDDB, species occurrence records from other sites near the Study Area, and previous reports for the project site. The potential for each special-status species to occur in the Study Area was evaluated 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).
- **Low Potential.** 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 some of the habitat on or adjacent on 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 (e.g., CNDDDB, other reports) on the site recently (within the last 5 years).

The CNDDDB and CNPS contain records for 48 sensitive plant species and 16 sensitive wildlife species within five miles of the project site (Appendix B Table 1). Five sensitive plant communities, California Walnut Woodland, Southern Coast Live Oak Riparian Forest, Southern Sycamore Alder Riparian Woodland, Valley Needlegrass Grassland and Valley Oak Woodland, were identified within five miles of the project site.

A small cluster of southern California black walnuts was observed adjacent to but outside of the Study Area on the northwest corner of Long Valley Road and Valley Circle Boulevard. Additionally, walnut saplings were detected within the tree canopy associated with the adjacent drainage. No walnuts, however, were recorded on-site. No other special-status plants have moderate or high potential to occur within the Study Area.



Of the 16 sensitive wildlife species identified, only the western red bat (*Lasiurus blossevillii*), has a moderate potential to occur on-site. None of the 16 wildlife species have a high occurrence potential within the project site.

Special-status Plant Species

The project site is located within a highly developed urban area. Because of historic and existing disturbance from high levels of anthropogenic activities and structures (U.S. Highway 101, Long Valley Road, Valley Circle Boulevard, plant nurseries and residential development), the site is not suitable for most special-status plant species. The only species with moderate or high potential to occur on-site is California black walnut. California walnut individuals (CNPS Rare Plant Rank 4.2 and a City of Los Angeles Protected Tree), are immediately adjacent to the Study Area, as observed during the field survey on April 3, 2019.

Although elements of marginally suitable habitat for some plant species are present (e.g., western spleenwort [*Asplenium vespertinum*], Malibu baccharis [*Baccharis malibuensis*], and Catalina mariposa-lily [*Calochortus catalinae*]), each species is limited to specific biotypes or soil types (e.g., volcanic, rocky, and/or heavy soils; upland scrub; etc.) which do not occur onsite. Due to the historic and existing disturbed condition of the project site and the urban and suburban nature of the surrounding land, the site is not suitable for most sensitive plant species.

Special-status Wildlife Species

The project site is located within a highly developed/disturbed urban and suburban area. Because of historic and existing disturbance from high levels of anthropogenic activities, and the lack of specific coastal habitats or suitable substrates, the site is not suitable for most special-status wildlife species.

The native and ornamental trees detected within the Study Area may provide moderate foraging and daytime or nighttime roosts for the western red bat. It is unlikely that any bats are using the trees for maternity roosts because no guano was observed during the field reconnaissance survey on April 3, 2019. It should be noted that this species is not geographically restricted to the vicinity of the project site.

Nesting Birds

While common birds are not designated as special-status species, destruction of their eggs, nests, and nestlings is prohibited by federal and state law. Section 3503.5 of the CFGC specifically protects birds of prey, and their nests and eggs against take, possession, or destruction. Section 3503 of the CFGC also incorporates restrictions imposed by the federal Migratory Bird Treaty Act (MBTA) with respect to migratory birds (which consists of most native bird species).

Trees and other vegetation onsite could provide suitable nesting habitat for several common avian species.

Sensitive Plant Communities

Plant communities are also considered sensitive biological resources if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. CDFW ranks sensitive communities as “threatened” or “very threatened” and keeps records of their occurrences in the CNDDDB. CNDDDB vegetation alliances are ranked 1 through 5 based on NatureServe’s (2018) methodology, with those alliances ranked globally (G) or state (S) as 1 through 3 generally



considered sensitive, though some communities with other ranks may also be considered sensitive (CDFW 2018).

The CNDDB has records for five sensitive terrestrial natural communities or habitat types that are reported from historical information within a 5-mile radius of the project site; California Walnut Woodland, Southern Coast Live Oak Riparian Forest, Southern Sycamore Alder Riparian Woodland, Valley Needlegrass Grassland and Valley Oak Woodland.

None of these sensitive communities occur in the Study Area. A small cluster of California walnuts, however, are immediately adjacent to the project site on the northwest corner of Long Valley Road and Valley Circle Boulevard. These walnuts are located outside of the Study Area.

Jurisdictional Wetlands and Waters

In accordance with Section 1602 of the CFGC, the CDFW has jurisdiction over lakes and streambeds (including adjacent riparian resources). CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake. Under Section 404 of the Clean Water Act (CWA), the USACE has authority to regulate activities that discharge dredge or fill material into wetlands or other “waters of the United States” through issuance of a Section 404 permit. Finally, the Los Angeles Regional Water Quality Control Board (LARWQCB) has jurisdiction over “waters of the State” pursuant to the Porter-Cologne Water Quality Control Act and has the responsibility for review of the project water quality certification per Section 401 of the federal CWA.

Based on aerial review, including review of the USFWS NWI (2019c) and Los Angeles County Storm Drain System map (County of Los Angeles 2019), and the reconnaissance field survey, no potentially jurisdictional drainages or wetlands are present on the project site. As described above, however, a portion of Arroyo Calabasas is adjacent to the Study Area and conveys flows underneath Long Valley Road.

Wildlife Movement

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines.

The CDFW BIOS (2019b) does not include any mapped essential habitat connectivity areas near the project site. In addition, the project site is surrounded by existing development and heavily traveled transportation corridors, including the U.S. Highway 101, and is therefore, not expected to serve as a significant migratory wildlife corridor.

Resources Protected by Local Policies and Ordinances

Natural resources within the Cities of Hidden Hills and Los Angeles are regulated according to the City of Hidden Hills’ municipal code (HHMC; City of Hidden Hills 2018) and the City of Los Angeles’ General Plan



(City of Los Angeles 2001) and Protected Tree Ordinance No. 177404, which includes the following policies related to biological resources:

- Section 6, Policy 1 City of Los Angeles General Plan: Continue to require evaluation, avoidance, and minimization of potential significant impacts, as well as mitigation of unavoidable significant impacts on sensitive animal and plant species and their habitats and habitat corridors relative to land development activities.
- Section 12, Policy 1 of the City of Los Angeles General Plan: Continue to identify significant habitat areas, corridors and buffers and to take measures to protect, enhance and/or restore them.

The City of Los Angeles General Plan also includes Significant Ecological Areas (SEAs), as identified and designated by the County of Los Angeles General Plan (2015), among the habitat types within the City of Los Angeles. The project site does not overlap with SEA boundaries as defined in the County of Los Angeles General Plan (2015), as further discussed in the City General Plan (2001).

Protected Trees

Title 5 Chapter 8 of the Hidden Hills municipal code regulates native oak trees and historical tree and contains policies to protect native oak trees and historical trees for the health, safety, or welfare of its citizens.

- **Native oak tree.** Any live tree of the genus *Quercus* and species *lobata*, *agrifolia*, *dumosa*, or California native hybrids that are alive, which is four (4) inches in diameter (12.5 inches in circumference) for a single trunk tree, or whose combined trunks total six (6) inches in diameter (18.8 inches in circumference) for a multi-trunk tree, measured at four and one-half feet above mean natural grade.
- **Historical tree.** Any live tree which is 11.46 inches in diameter (36 inches in circumference) for a single trunk, or whose combined diameter of any two trunks is 17.19 inches in diameter (54 inches in circumference) for a multi-trunk tree, measured at two feet above mean natural grade.

According to Articles 2 and 7 of Chapter I, Article 6 of Chapter IV, and Section 96.303.5 of the City of Los Angeles Municipal Code and City Ordinance No. 177404 (City of Los Angeles 2006b), any of the following southern California native tree species measuring four inches or more in diameter at breast height (DBH; cumulative total for multi-trunks) is considered a protected tree species within City of Los Angeles limits: valley oak (*Quercus lobata*), California live oak (*Quercus agrifolia*), or any other *Quercus* sp. tree indigenous to California, except for scrub oak (*Quercus dumosa*); southern California black walnut (*Juglans californica* var. *californica*); western sycamore (*Platanus racemosa*); and California bay (*Umbellularia californica*). Blue elderberry (*Sambucus nigra* ssp. *caerulea*)¹ and toyon (*Heteromeles arbutifolia*) are proposed to be added to this protected tree list, but such an amendment has not yet been formally adopted by the Los Angeles City Council (City of Los Angeles 2018).

Trees identified within the project site during the field survey include coast live oak, valley oak, Brazilian pepper tree, Canary Island pine, coast redwood, eucalyptus, fan palm, glossy privet, Peruvian pepper tree and shiny xylosma.

An Arborist Report and Tree Protection Plan (ARTPP) was prepared by Rincon in June 2019. This ARTPP assessed the project's potential effects to protected trees in accordance with the California

¹ The proposed amendment to the City's Tree Protection Ordinance identifies this species as Mexican elderberry (*Sambucus mexicana*), which is a misapplied synonym for blue elderberry (*Sambucus nigra* ssp. *caerulea*) (Jepson Flora Project 2019). Blue elderberry (*Sambucus nigra* ssp. *caerulea*) is used in this document.



Environmental Quality Act (CEQA), the City of Hidden Hills municipal code and the City of Los Angeles Protected Tree Ordinance (No. 177404) (2006b). The results of the 2019 ARTPP (Rincon 2019) represent current conditions on the site and are incorporated here to analyze potential project impacts and mitigation. The 2019 ARTPP identified 38 protected coast live oaks and three protected valley oaks within the Study Area. In addition, a cluster of California walnut trees, California walnut tree saplings, coast live oaks and western sycamores were identified adjacent to the site. California walnut, coast live oak, valley oak and western sycamore are protected species.

Habitat Conservation Plans

The project is not subject to an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

Impact Analysis and Mitigation Measures

The criteria used to evaluate potential project-related impacts to biological resources are presented below. This section discusses the possible adverse impacts to biological resources that may occur from implementation of the project and recommends appropriate avoidance, minimization, and mitigation measures that would reduce those impacts to less than significant levels.

Special-status Species

As mentioned above, 48 sensitive plant species and 16 sensitive wildlife species are known to occur or have potential to occur within a five-mile radius of the project site.

Special-status Plant Species

The majority of special-status plant species do not have potential to occur onsite. The only special-status plant species that was observed during the April 3, 2019 field survey includes California walnut, which was detected adjacent to the Study Area. If the proposed project activities remain within the project boundaries (Figure 3), no impacts to special-status plant species would occur.

Special-status Wildlife Species

Of the 16 sensitive wildlife species identified, only one sensitive wildlife species, the western red bat, could potentially occur onsite. No sensitive wildlife species were identified on the project site.

Potential direct impacts to western red bat within the site include harassment or injury if they are roosting or foraging within the project site during project construction. This impact could be significant only if it results in a population level impact, which would not occur with project implementation. Indirect impacts from removal of habitat and noise from the development and use of the project site would be less than significant given the availability of other suitable roost sites in the vicinity. Direct impacts can be further reduced to a less than significant level through implementation of MM BIO-1 specifying pre-construction surveys and direct impact avoidance.

Migratory or other common nesting birds, while not designated as special-status species, are protected by the CFGC (Sections 3503, 3503.5, 3511, and 3513) and MBTA and may nest onsite. Therefore, construction of the project has the potential to directly (by destroying a nest) or indirectly (construction noise, dust, and other human disturbances that may cause a nest to fail) impact nesting birds protected under the CFGC and MBTA.



Mitigation Measures

BIO-1: Roosting Bats Impact Avoidance and Minimization

A qualified biologist should conduct a pre-construction survey for roosting bats within 14 days prior to the start of project-related tree removal or disturbance work. The survey should include all trees suitable for roosting by the western red bat within the disturbance footprint and a 100-foot buffer with inaccessible areas (i.e. private lands) surveyed with binoculars, as feasible.

If active maternity bat roosts are present onsite, a buffer zone of 100 feet should be established around the roosts that excludes construction activities or other disturbances. Tree removal activities should occur only during periods when maternity roosts are no longer present in those trees proposed to be removed (typically October and November), as determined by a qualified biologist.

If a non-breeding bat is found in a tree scheduled to be removed, the individual(s) should be safely evicted under the direction of a qualified bat biologist. Trees with roosts that need to be removed would first have bats evicted at dusk by the qualified bat biologist, just prior to tree removal, to allow bats to escape during the darker hours.

Night work from dusk (30 minutes before sunset) until dawn (30 minutes after sunrise) should be avoided as this is the most active time for bats. If night work must occur, project lighting should be focused directly on the work area to minimize attraction from foraging bats. Additionally, tree and vegetation removal should only occur during daylight hours. Tree trimming or removal should be conducted in the presence of a qualified biologist. If bats are observed in the work area, a qualified biologist should be contacted immediately.

BIO-2: Nesting Birds

If site preparation and construction activities are initiated during the breeding season (generally February 1 through August 31, but variable based on seasonal and annual climatic conditions), a pre-construction nesting bird survey will be conducted by a qualified biologist no more than 3 days prior to initial ground disturbance or vegetation removal to determine the presence/absence, location, and status of any active nests onsite or within 100 feet of the site for common nesting birds, or within 300 feet of the site for nesting raptors. In areas where site access is limited or prohibited (e.g., private property), the area will be surveyed using binoculars. Should land clearing activities pause for more than one week during the breeding season, another nesting bird survey will be conducted prior to re-initiation of those activities.

If active nests are found, the qualified biologist will establish and demarcate with fencing or flagging an appropriate buffer (dependent upon the species, proposed work activity, and existing disturbances associated with land uses outside of the site) around the active nest(s). No ground disturbing activities will occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. The qualified biologist will monitor the active nest(s) to determine the adequacy of the buffer. Encroachment into the buffer would occur only at the discretion of the qualified biologist.

The methods and results of the nesting bird survey(s), any nesting bird avoidance efforts, and the success of the avoidance buffers will be documented in a letter report to the City no later than 3 weeks following the completion of the survey(s) and/or active nest monitoring activities.



Sensitive Plant Communities

No sensitive plant communities were observed onsite, although southern coast live oak riparian forest may be associated with the adjacent drainage. Additionally, a cluster of California black walnuts is outside of the Study Area on the corner of Long Valley Road and Valley Circle Boulevard. If the proposed project activities remain within the project boundaries (Figure 3), no impacts to sensitive plant communities would occur.

Jurisdictional Waters and Wetlands

The project site does not contain any jurisdictional drainages or wetlands. A jurisdictional drainage is, however, adjacent to the project site. If the proposed project activities remain within the project boundaries (Figure 3), no impacts to jurisdictional waters or wetlands would occur.

Wildlife Movement

As discussed above, the proposed project is not located within any known regional wildlife movement corridors (*e.g.*, Essential Connective Area or Natural Landscape Block identified in Spencer *et al.* 2010). The immediate surrounding area consists primarily of developed residential and some urban landscapes. Given the developed nature of the surroundings, the site would not function as a wildlife corridor or linkage, or as a wildlife nursery site. Therefore, impacts would be less than significant, and no mitigation is required.

Local Policies and Ordinances

The proposed project would not conflict with policies of the City of Los Angeles General Plan (2001) protecting biological resources. The proposed project would not conflict with Section 6, Policy 1 as sensitive species have low likelihood to occur. MM BIO-1 would be implemented to reduce impacts to roosting bats to a less than significant level. The project would not have significant impacts to nesting birds through implementation of MM BIO-2. The proposed project would also not conflict with Section 12, Policy 1 as no significant habitat areas, corridors or buffers are present onsite. Therefore, with the implementation of the proposed measures the proposed project would be consistent with these policies and no additional mitigation is required.

Protected Trees

As identified in the ARTPP (Rincon 2019), of the 58 trees protected by either the City of Los Angeles Protected Tree Ordinance (LAMC) or the HHMC, 32 trees have trunks occurring within the project boundary; 17 trees have trunks occurring within the 20-foot buffer only; and nine (9) trees have trunks occurring outside of the survey area but have canopies that overhang the survey area. Impacts to trees will likely include encroachment (trimming of branches in the canopy, severing of roots, and soil compaction) or removal. Existing oak trees within the proposed parking lot and staging area will be preserved. Impacts beyond this preservation measure, however, cannot be quantified at this time due to the conceptual nature of the project plans.

The City of Hidden Hills will coordinate with the City of Los Angeles to assure that the project does not conflict with the City ordinances, including acquiring a permit if needed. In particular, the City of Hidden Hills would be required to comply with the HHMC, City of Los Angeles Protected Tree Ordinance (No. 177404) of the LAMC (2006b) and the City of Los Angeles Urban Forestry Division policies. The HHMC requires protected tree replacement at a 4:1 ratio for each tree removed, unless otherwise



recommended by the Hidden Hills City Director. In no event may the Director require a replacement ratio of less than 2:1. The City of Los Angeles Urban Forestry Division policies requires, at minimum, protected tree replacement at a 4:1 ratio.

As such, the City of Hidden Hills will be responsible for planting replacement trees if any protected tree is removed because of project activities for compliance with all subsequent City requirements, measures, and fees, as applicable. Upon compliance with the HHMC and LAMC requirements, and City of Los Angeles Urban Forestry Division policies, potential impacts would be reduced to a less than significant level.

If any protected tree dies or is damaged to the point of requiring removal during construction activities, the Hidden Hills City Director may require one of the following mitigation measures:

- Replacement trees should be provided at a 4:1 ratio for each tree removed, unless otherwise recommended by the Director. In no event may the Director require a replacement ratio of less than 2:1.
- Replacement trees should be of suitable type, size, number, location, and date of planting. Relocation of trees approved for removal may not necessarily be a mitigating factor. The Director may consider the following factors:
 - Vegetative character of the surrounding area,
 - Number of protected trees proposed for removal in relation to protected trees currently existing within the project limits,
 - Anticipated effectiveness of the replacement trees, and
 - Development plans for the proposed construction or use of the subject property.
- The value of replacement trees should be established by the Director's estimate, mutually agreed upon by the applicant and Director; and/or an appraisal prepared by an arborist, horticulturist, or licensed landscape architect.

Habitat Conservation Plans

The project site is not located in an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

Limitations, Assumptions, and Use Reliance

This Biological Resources Assessment has been performed in accordance with professionally accepted biological investigation practices conducted at this time and in this geographic area. The biological investigation is limited by the scope of work performed. Biological surveys for the presence or absence of certain taxa have been conducted as part of this assessment but were not performed during a particular blooming period, nesting period, or particular portion of the season when positive identification would be expected if present, and therefore, cannot be considered definitive. The biological surveys are limited also by the environmental conditions present at the time of the surveys. In addition, general biological (or protocol) surveys do not guarantee that the organisms are not present and will not be discovered in the future within the site. In particular, mobile wildlife species could occupy the site on a transient basis or re-establish populations in the future. Our field studies were based on current industry practices, which change over time and may not be applicable in the future. No other guarantees or warranties, expressed or implied, are provided. The findings and opinions conveyed



in this report are based on findings derived from site reconnaissance, jurisdictional areas, review of CNDDDB RareFind5, and specified historical and literature sources. Standard data sources relied upon during the completion of this report, such as the CNDDDB, may vary with regard to accuracy and completeness. In particular, the CNDDDB is compiled from research and observations reported to CDFW that may or may not have been the result of comprehensive or site-specific field surveys. Although Rincon believes the data sources are reasonably reliable, Rincon cannot and does not guarantee the authenticity or reliability of the data sources it has used. Additionally, pursuant to our contract, the data sources reviewed included only those that are practically reviewable without the need for extraordinary research and analysis.

Thank you for the opportunity to provide this Biological Resources Assessment. Please contact the undersigned with any questions.

Sincerely,

Rincon Consultants, Inc.

Handwritten signature of Jared Reed in black ink.

Jared Reed
Senior Biologist/Project Manager

Handwritten signature of Brenna Vredeveld in blue ink.

Brenna Vredeveld
Senior Project Manager/Biologist

Handwritten signature of Steven J. Hongola in black ink.

Steven J. Hongola
Principal/Senior Ecologist

Attachments

- Attachment A Inventory of Plant and Animal Species Observed On-site
- Attachment B CNDDDB/CNPS Query Results and Occurrence Potentials
- Attachment C Site Survey Photographs – April 3, 2019



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Attachment A

Inventory of Plant and Animal Species Observed On-site



Inventory of Plant Species Observed On-site

Scientific Name	Common Name	Status	Native or Introduced
Trees			
<i>Eucalyptus</i> sp.	eucalyptus	None	Introduced
<i>Ligustrum lucidum</i>	Chinese privet	None	Introduced
<i>Pinus canariensis</i>	Canary Island pine	None	Introduced
<i>Quercus agrifolia</i>	coast live oak	None	Native
<i>Quercus lobata</i>	valley oak	None	Native
<i>Schinus molle</i>	pepper tree	None	Introduced
<i>Schinus terebinthifolius</i>	Brazilian pepper tree	None	Introduced
<i>Sequoia sempervirens</i>	coast redwood	None	Native
<i>Washingtonia</i> sp.	fan palm	None	Introduced
<i>Xylosma congestum</i>	shiny xylosma	None	Introduced
Shrubs			
<i>Baccharis pilularis</i>	coyote brush	None	Native
<i>Encelia californica</i>	California brittlebush	None	Native
<i>Malosma laurina</i>	laurel sumac	None	Native
<i>Nerium oleander</i>	oleander	None	Introduced
<i>Rhus integrifolia</i>	lemonade berry	None	Native
Herbs			
<i>Bromus diandrus</i>	rippgut brome	None	Introduced
<i>Bromus madritensis</i> ssp. <i>rubens</i>	red brome	None	Introduced
<i>Centaurea melitensis</i>	tochalote	None	Introduced
<i>Erodium botrys</i>	long-beaked filaree	None	Introduced
<i>Erodium cicutarium</i>	red-stem filaree	None	Introduced
<i>Hirschfeldia incana</i>	shortpod mustard	None	Introduced
<i>Lupinus</i> sp.	lupine	None	Native
<i>Malva parviflora</i>	cheeseweed	None	Introduced
<i>Medicago</i> sp.	burclover	None	Introduced
<i>Silybum marianum</i>	blessed milk-thistle	None	Introduced

The Jepson Online Interchange for California Floristics



Inventory of Animal Species Observed On-site

Scientific Name	Common Name	Status	Native or Introduced
Birds			
<i>Anas platyrhynchos</i>	mallard	None	Native
<i>Bombycilla cedrorum</i>	cedar waxwing	None	Native
<i>Buteo lineatus</i>	red-shouldered hawk	None	Native
<i>Columba livia</i>	rock pigeon	None	Introduced
<i>Corvus brachyrhynchos</i>	American crow	None	Native
<i>Corvus corax</i>	common raven	None	Native
<i>Junco hyemalis</i>	dark-eyed junco	None	Native
<i>Pipilo maculatus</i>	spotted towhee	None	Native
<i>Psaltriparus minimus</i>	bushtit	None	Native
<i>Sayornis nigricans</i>	black phoebe	None	Native
<i>Sturnus vulgaris</i>	European starling	None	Introduced
<i>Zenaida macroura</i>	mourning dove	None	Native
Mammals			
<i>Sciurus griseus</i>	western gray squirrel	None	Native
Reptiles			
<i>Sceloporus occidentalis</i>	western fence lizard	None	Native

American Ornithological Society
 Mammals of North America
 The Center for North American Herpetology

Attachment B

CNDDDB/CNPS Query Results and Occurrence Potentials



Table 1 Special-Status Species Occurrence Table

Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
Plants				
<i>Asplenium vespertinum</i> western spleenwort	None/None G4/S4 4.2	Chaparral, cismontane woodland, coastal scrub. Requires rocky areas. 180-1000 m. perennial rhizomatous herb. Blooms Feb-Jun	Low	While cismontane woodland is present, the project site is lacking rocky substrates, is almost entirely developed and surrounded by urban and suburban development.
<i>Astragalus brauntonii</i> Braunton's milk-vetch	Endangered /None G2/S2 1B.1	Chaparral, coastal scrub, valley and foothill grassland. Recent burns or disturbed areas; usually on sandstone with carbonate layers. Soil specialist; requires shallow soils to defeat pocket gophers and open areas, preferably on hilltops, saddles or bowls between hills. 3-640 m. perennial herb. Blooms Jan-Aug	None	Lack of suitable chaparral, scrub, or grassland habitat within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i> Ventura marsh milk-vetch	Endangered / Endangered G2T1/S1 1B.1	Coastal dunes, coastal scrub, marshes and swamps (edges, coastal salt or brackish). 1-35 m. perennial herb. Blooms (Jun) Aug-Oct	None	Lack of suitable coastal dune, scrub, or marsh habitat within the project site. Study area is outside of this varietal's known elevation range. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Astragalus tener</i> var. <i>titi</i> coastal dunes milk-vetch	Endangered / Endangered G2T1/S1 1B.1	Often vernal mesic areas in sandy coastal bluff scrub, coastal dunes, mesic coastal prairie. 1-50 m. annual herb. Blooms Mar-May	None	No suitable coastal habitat within the project site. Study area is outside of this varietal's known elevation range. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Atriplex coulteri</i> Coulter's saltbush	None/None G3/S1S2 1B.1	Coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland. Ocean bluffs, ridgetops, as well as alkaline low places. Alkaline or clay soils. 2-460 m. perennial herb. Blooms Mar-Oct	None	No suitable coastal habitat or grassland within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.



Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
<i>Atriplex serenana</i> var. <i> davidsonii</i> Davidson's saltscale	None/None G5T1/S1 1B.2	Alkaline soils in coastal bluff scrub and coastal scrub. 10-200 m. annual herb. Blooms Apr-Oct	None	No suitable coastal bluff scrub or coastal scrub habitat within the project site. Study area is outside of this varietal's known elevation range. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Baccharis malibuensis</i> Malibu baccharis	None/None G1/S1 1B.1	Coastal scrub, chaparral, cismontane woodland, riparian woodland. In Conejo volcanic substrates, often on exposed roadcuts. Sometimes occupies oak woodland habitat. 150-320 m. perennial deciduous shrub. Blooms Aug	Low	While cismontane woodland is present, the project site is lacking volcanic substrates, is almost entirely developed and surrounded by urban and suburban development.
<i>Calandrinia breweri</i> Brewer's calandrinia	None/None G4/S4 4.2	Chaparral, coastal scrub. Sandy or loamy soils. Disturbed sites, burns. 10-1200 m. annual herb. Blooms (Jan)Mar-Jun	None	No suitable chaparral or scrub habitat within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Calochortus catalinae</i> Catalina mariposa- lily	None/None G3G4/S3S4 4.2	Valley and foothill grassland, chaparral, coastal scrub, cismontane woodland. In heavy soils, open slopes, openings in brush. 15-700 m. perennial bulbiferous herb. Blooms (Feb)Mar-Jun	Low	While cismontane woodland is present, the site does not contain heavy soils. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Calochortus clavatus</i> var. <i> clavatus</i> club-haired mariposa-lily	None/None G4T3/S3 4.3	Valley and foothill grassland, chaparral, coastal scrub, cismontane woodland. In usually serpentinite, clay and rocky soils. 75-1300 m. perennial bulbiferous herb. Blooms (Mar)May-Jun	Low	While cismontane woodland is present, the site does not contain serpentinite, clay or rocky soils. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Calochortus clavatus</i> var. <i> gracilis</i> slender mariposa- lily	None/None G4T2T3/S2S3 1B.2	Valley and foothill grassland, chaparral, coastal scrub. 320-1000 m. perennial bulbiferous herb. Blooms Mar-Jun (Nov)	None	Lack of suitable chaparral, scrub, or grassland habitat within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.



Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
<i>Calochortus fimbriatus</i> late-flowered mariposa-lily	None/None G3/S3 1B.3	Chaparral, cismontane woodland, riparian woodland. Dry, open coastal woodland, chaparral; on serpentine. 270-1435 m. perennial bulbiferous herb. Blooms Jun-Aug	Low	While cismontane woodland is present, the site does not contain serpentine soils. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Calochortus plummerae</i> Plummer's mariposa-lily	None/None G4/S4 4.2	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest. Occurs on rocky and sandy sites, usually of granitic or alluvial material. Can be very common after fire. 60-2500 m. perennial bulbiferous herb. Blooms May-Jul	Low	While cismontane woodland is present, the perennial species was not observed onsite. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Calystegia peirsonii</i> Peirson's morning-glory	None/None G4/S4 4.2	Chaparral, coastal scrub, chenopod scrub, cismontane woodland, lower montane coniferous forest, valley and foothill grassland. Often in disturbed areas or along roadsides or in grassy, open areas. 30-1500 m. perennial rhizomatous herb. Blooms Apr-Jun	Low	While cismontane woodland is present, species has not been observed within five miles of the project site. The species was not recorded within the CNDDDB search or within five miles of the site in the CNPS 9-quad search. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Camissoniopsis lewisii</i> Lewis' evening-primrose	None/None G4/S4 3	Valley and foothill grassland, coastal bluff scrub, cismontane woodland, coastal dunes, coastal scrub. Sandy or clay soil. 0-300 m. annual herb. Blooms Mar-May (Jun)	Low	While cismontane woodland is present, species has not been observed within five miles of the project site. The species was not recorded within the CNDDDB search or within five miles of the site in the CNPS 9-quad search. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Cercocarpus betuloides</i> var. <i>blanchae</i> island mountain-mahogany	None/None G5T4/S4 4.3	Chaparral, closed-cone coniferous forest. 30-600 m. perennial evergreen shrub. Blooms Feb-May	None	No suitable chaparral or coniferous forest within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.



Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i> salt marsh bird's-beak	Endangered/ Endangered G4T1/S1 1B.2	Coastal dunes and marshes and swamps with coastal salt. 0-30 m. annual herb (hemiparasitic). Blooms May-Oct(Nov)	None	No suitable coastal habitat within the project site. Study area is outside of this subspecies' known elevation range.
<i>Chorizanthe parryi</i> var. <i>fernandina</i> San Fernando Valley spineflower	Proposed Threatened /Endangered G2T1/S1 1B.1	Coastal scrub, valley and foothill grassland. Sandy soils. 15-1015 m. annual herb. Blooms Apr-Jul	None	This project site lacks suitable scrub and grassland habitat. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Chorizanthe parryi</i> var. <i>parryi</i> Parry's spineflower	None/None G3T2/S2 1B.1	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. Sandy or rocky soils in openings. 275-1220 m. annual herb. Blooms Apr-Jun	Low	While cismontane woodland is present, species has not been observed within five miles of the project site. The species was not recorded within the CNDDB search or within five miles of the site in the CNPS 9-quad search. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Convolvulus simulans</i> small-flowered morning-glory	None/None G4/S4 4.2	Chaparral, coastal scrub, valley and foothill grassland. Wet clay, serpentine ridges. 30-700 m. annual herb. Blooms Mar-Jul	None	No suitable chaparral, coastal shrub, or grassland habitat within the project site. Project site lacks serpentine. Study area is almost entirely developed and surrounded by urban and suburban development.
<i>Deinandra minthornii</i> Santa Susana tarplant	None/Rare G2/S2 1B.2	Chaparral, coastal scrub. On sandstone outcrops and crevices, in shrubland. 280-705 m. perennial deciduous shrub. Blooms Jul-Nov	None	No suitable chaparral or coastal scrub habitat within the project site. The site lacks sandstone outcrops and crevices.
<i>Delphinium parryi</i> ssp. <i>blochmaniae</i> dune larkspur	None/None G4T2/S2 1B.2	Maritime chaparral and coastal dunes. 0-200 m. Perennial herb. Blooms Apr-June.	None	No suitable coastal habitat within the project site. Study area is almost entirely developed and surrounded by urban and suburban development.



Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
<i>Delphinium parryi</i> ssp. <i>purpureum</i> Mt. Pinos larkspur	None/None G4T4/S4 4.3	Chaparral, Mojavean desert scrub and pinyon and juniper woodland. 1000-2600 m. Perennial herb. Blooms May-June.	None	No suitable chaparral, scrub, or pinyon or juniper woodland habitat within the project site. Project site is outside of this subspecies' known elevation range. Study area is almost entirely developed and surrounded by urban and suburban development.
<i>Dithyrea maritima</i> beach spectaclepod	None/ Threatened G1/S1 1B.1	Coastal dunes and coastal scrub in sandy soils. 3-50 m. perennial rhizomatous herb. Blooms Mar-May	None	No suitable coastal habitat present within project site. Study area is outside of this species' known elevation range. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Dudleya</i> <i>blochmaniae</i> ssp. <i>blochmaniae</i> Blochman's dudleya	None/None G3T2/S2 1B.1	Coastal scrub, coastal bluff scrub, chaparral, valley and foothill grassland. Open, rocky slopes; often in shallow clays over serpentine or in rocky areas with little soil. 5-450 m. perennial herb. Blooms Apr-Jun	None	The project site lacks scrub, chaparral, and grassland habitat. No clays, serpentine, or rocky areas occur onsite.
<i>Dudleya cymosa</i> ssp. <i>agourensis</i> Agoura Hills dudleya	Threatened/ None G5T1/S1 1B.2	Chaparral, cismontane woodland. Rocky, volcanic breccia. 260-460 m. perennial herb. Blooms May-June	Low	While cismontane woodland is present, the site lacks volcanic breccia. This subspecies has not been observed within five miles of the project site. The species was not recorded within the CNDDDB search or within five miles of the site in the CNPS 9-quad search.
<i>Dudleya cymosa</i> ssp. <i>marcescens</i> marcescent dudleya	Threatened/ Rare G5T2/S2 1B.2	Chaparral. On sheer rock surfaces and rocky volcanic cliffs. 145-670 m. perennial herb. Blooms April-Jul	None	The project site lacks chaparral and volcanic cliffs.
<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i> Santa Monica dudleya	Threatened/ None G5T1/S1 1B.1	Chaparral, coastal scrub. In canyons on volcanic or sedimentary substrates; primarily on north-facing slopes. 150-335 m. perennial herb. Blooms Mar-Jun	None	The project site lacks chaparral and scrub habitat.
<i>Dudleya</i> <i>multicaulis</i> many-stemmed dudleya	None/None G2/S2 1B.2	Chaparral, coastal scrub, valley and foothill grassland. In heavy, often clayey soils or grassy slopes. 15-790 m. perennial herb. Blooms Apr-Jul	None	The project site lacks chaparral, scrub, and grassland as well as clayey soils and grassy slopes.



Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
<i>Dudleya parva</i> Conejo dudleya	Threatened/ None G1/S1 1B.2	Coastal scrub, valley and foothill grassland. In rocky or gravelly, clay or volcanic substrates. 60-450 m. perennial her. Blooms May-Jun	None	The project site lacks scrub and grassland as well as rocky, gravelly, clay or volcanic substrates.
<i>Eriogonum crocatum</i> conejo buckwheat	None/Rare G1/S1 1B.2	Chaparral, coastal scrub, valley and foothill grassland. In Conejo volcanic outcrops and rocky areas. 50-580 m. perennial herb. Blooms Apr-Jul	None	The project site lacks chaparral, scrub and grassland as well as Conejo volcanic outcrops.
<i>Hordeum intercedens</i> vernal barley	None/None G3G4/S3S4 3.2	Valley and foothill grassland, vernal pools, coastal dunes, coastal scrub. Vernal pools, dry, saline streambeds, alkaline flats. 5-1000 m. annual herb. Blooms Mar-Jun	None	The project site lacks grasslands, vernal pool, coastal dune, and scrub habitat.
<i>Horkelia cuneata</i> var. <i>puberula</i> mesa horkelia	None/None G4T1/S1 1B.1	Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. 15-1645 m. perennial herb. Blooms Feb-Jul (Sep)	Low	While cismontane woodland is present, almost the entirety of the project site is developed and surrounded by urban and suburban development.
<i>Isocoma menziesii</i> var. <i>decumbens</i> decumbent goldenbush	None/None G3G5T2T3/S2 1B.2	Chaparral, coastal scrub. In sandy substrates, often in disturbed areas. 10-135 m. perennial shrub. Blooms Apr-Nov	None	The project site lacks chaparral and scrub habitat. Study area is outside of this varietal's elevation range.
<i>Juglans californica</i> southern California black walnut	None/None G3/S3 4.2	Chaparral, coastal scrub, cismontane woodland. Slopes, canyons, alluvial habitats. 50-900 m. perennial deciduous tree. Blooms Mar-Aug	High	Rincon biologists observed this species immediately adjacent to the project site during the survey. A walnut cluster was observed at the corner of Long Valley Road and Valley Circle Boulevard, and walnut saplings were observed within the adjacent drainage. Additionally, California Walnut Woodland has been detected within 5 miles of the project site.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i> Coulter's goldfields	None/None G4T2/S2 1B.1	Coastal salt marshes, playas, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-1375 m. annual herb. Blooms Feb-Jun	None	No suitable marsh, playa, or vernal pool habitat within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.



Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
<i>Lilium humboldtii</i> ssp. <i>ocellatum</i> ocellated Humboldt lily	None/None G4T4?/S4? 4.2	Chaparral, coastal scrub, cismontane woodland, lower montane coniferous forest, riparian forest. Yellow-pine forest or openings, oak canyons. 30-1800 m. perennial bulbiferous herb. Blooms Mar-July(Aug)	Low	While cismontane woodland is present, the species has not been observed within five miles of the project site. The species was not recorded within the CNDDDB search or within five miles of the site in the CNPS 9-quad search. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Lupinus paynei</i> Payne's bush lupine	None/None G1Q/S1 1B.1	Coastal scrub, riparian scrub, valley and foothill grassland. In sandy substrates. 220-420 m. perennial shrub. Mar-Apr(May-Jul)	None	The project site lacks scrub and grassland habitat. Almost the entirety of the project site is developed and surrounded by urban and suburban development.
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i> white-veined monardella	None/None G4T3/S3 1B.3	Chaparral, cismontane woodland. Dry slopes. 50-1280 m. perennial herb. Blooms (Apr)May-Aug (Sep-Dec)	Low	While cismontane woodland is present, the project site is almost entirely developed and surrounded by urban and suburban development.
<i>Navarretia ojaiensis</i> Ojai navarretia	None/None G2/S2 1B.1	Chaparral, coastal scrub, valley and foothill grassland. Openings in shrublands or grasslands. 275-620 m. annual herb. Blooms May-Jul	None	Project site lacks suitable chaparral, scrub, and grassland habitat. Project site is almost entirely developed and surrounded by urban and residential development.
<i>Nolina cismontane</i> chaparral nolina	None/None G3/S3 1B.2	Chaparral, coastal scrub. Primarily on sandstone and shale substrates; also known from gabbro. 140-1275 m. perennial evergreen shrub. Blooms (Mar)May-Jul	None	No suitable chaparral or scrub habitat within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Orcuttia californica</i> California Orcutt grass	Endangered/ Endangered G1/S1 1B.1	Vernal pools. 15-660 m. annual herb. Blooms Apr-Aug	None	The project site lacks vernal pools.
<i>Pentachaeta lyonia</i> Lyon's pentachaeta	Endangered/ Endangered G1/S1 1B.1	Chaparral, valley and foothill grassland, coastal scrub. Edges of clearings in chaparral, usually at the ecotone between grassland and chaparral or edges of firebreaks. 30-630 m. annual herb. Blooms (Feb)Mar-Aug	None	Project site lacks suitable chaparral, grassland, and scrub habitat. Project site is almost entirely developed and surrounded by urban and suburban development.



Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
<i>Phacelia hubbyi</i> Hubby's phacelia	None/None G4/S4 4.2	Chaparral, coastal scrub, valley and foothill grassland. Gravelly, rocky areas and talus slopes. 0-1000 m. annual herb. Blooms April-Jul	None	No suitable chaparral, scrub, or grassland habitat within the project site. Site lacks gravelly, rocky areas and talus slopes.
<i>Phacelia ramosissima</i> var. <i>australitoralis</i> south coast branching phacelia	None/None G5?T3Q/S3 3.2	Chaparral, coastal dunes, coastal scrub, coastal salt marshes and swamps. In sandy, sometimes rocky substrates. 5-300 m .perennial herb. Blooms Mar-Aug	None	No suitable chaparral, scrub, or marshes and swamps within the project site.
<i>Senecio aphanactis</i> chaparral ragwort	None/None G3/S2 2B.2	Chaparral, cismontane woodland, coastal scrub. Sometimes in alkaline substrates. 15-800 m. annual herb. Blooms Jan-Apr(May)	Low	While cismontane woodland is present, the species has not been observed within five miles of the project site. The species was not recorded within the CNDDB search or within five miles of the site in the CNPS 9-quad search. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Thelypteris puberula</i> var. <i>sonorensis</i> Sonoran maiden fern	None/None G5T3/S2 2B.2	Meadows and seeps. Along streams, seepage areas. 60-930 m. perennial rhizomatous herb. Blooms Jan-Sep	None	No suitable mesic habitat within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Tortula californica</i> California screw-moss	None/None G2G3/S2S3 1B.2	Chenopod scrub, valley and foothill grassland. In sandy soils. 10-1460 m. moss.	None	The project site lacks chenopod scrub and grassland habitat. The Study area is almost entirely developed and surrounded by urban and suburban development.

Insects

<i>Bombus crotchii</i> Crotch bumble bee	None/None G3G4/S1S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.	None	No suitable food plants observed on the project site. Project site is almost entirely developed and surrounded by urban and suburban development.
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Arachnids

<i>Socalchemmis gertschi</i> Gertsch's socialchemmis spider	None/None G1/S1	Known from only 2 localities in Los Angeles County: Brentwood and Topanga Canyon.	None	This species is not known to occur in the general region of the project site.
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Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
Fish				
<i>Oncorhynchus mykiss irideus</i> pop. 10 steelhead - southern California DPS	Endangered/ None G5T1Q/S1	Federal listing refers to populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County). Likely have greater physiological tolerances to warmer water and more variable conditions.	None	The project site does not contain suitable water sources to support fish.
Amphibians				
<i>Anaxyrus californicus</i> arroyo toad	Endangered/ None G2G3/S2S3 SSC	Semi-arid regions near washes or intermittent streams, including valley-foothill desert riparian, desert wash, etc. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly, areas of streams in drier part of range.	Low	Project site is almost entirely developed, although is adjacent to a marginally suitable stream containing sycamores.
<i>Rana draytonii</i> California red-legged frog	Threatened/ None G2G3/S2S3 SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	Low	The project site does not contain a suitable water source, although the adjacent drainage contains marginally suitable habitat due to presence of surface water and riparian vegetation.
Reptiles				
<i>Anniella</i> sp. California legless lizard	None/None G3G4/S3S4 SSC	Within a variety of open habitats. Generally in moist, loose soil. Prefers soils with a high moisture content.	None	The project site lacks loose soils with a high moisture content. Almost the entirety of the study area is developed and surrounded by urban and suburban development.
<i>Aspidoscelis tigris stejnegeri</i> coastal whiptail	None/None G5T5/S3 SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland & riparian areas. Ground may be firm soil, sandy, or rocky.	Low	Little suitable habitat and no suitable substrates within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Emys marmorata</i> western pond turtle	None/None G3G4/S3 SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 1829 m (6000 ft) elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	None	No suitable aquatic habitats within the project site, although the adjacent drainage contains marginally suitable habitat. Project site is almost entirely developed and surrounded by urban and suburban development.



Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
<i>Phrynosoma blainvillii</i> coast horned lizard	None/None G3G4/S3S4 SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	None	No suitable habitats or substrates within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.
<i>Thamnophis hammondi</i> two-striped gartersnake	None/None G4/S3S4 SSC	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 2134 m (7000 ft) elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	None	No suitable aquatic habitats within the project site. Project site is almost entirely developed and surrounded by urban and suburban development.
Birds				
<i>Aimophila ruficeps canescens</i> southern California rufous-crowned sparrow	None/None G5T3/S3 WL	Resident in southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.	None	Project site lacks suitable coastal sage scrub or suitable chaparral habitat. Study area is almost entirely developed and surrounded by urban and suburban development.
<i>Athene cucularia</i> burrowing owl	None /None G4/S3 SSC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably the California ground squirrel (<i>Otospermophilus beecheyi</i>).	None	No suitable burrows within the project site. Project site is almost entirely developed.
<i>Falco peregrinus anatum</i> American peregrine falcon	FDL/SDL G4T4/S3S4 FP	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also human-made structures.	Low	Project site is adjacent to a drainage which contains marginally suitable tree habitat, although contains no structures potentially suitable for utilization by this falcon.
<i>Polioptila californica californica</i> coastal California gnatcatcher	Threatened/ None G4G5T2Q/S2 SSC	Obligate, permanent resident of coastal sage scrub below 762 m (2500 ft) in southern California. Low, coastal sage scrub in arid washes, on mesas and slopes.	None	Project site lacks suitable coastal sage scrub. Project is almost entirely developed and surrounded by urban and suburban development.
Mammals				
<i>Lasiurus blossevillii</i> western red bat	None/None G5/S3	Roosts primarily in trees 2-40 ft above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	Moderate	Suitable roosting habitat is present within the trees on-site, although the Study Area is largely comprised of developed areas.



Scientific Name Common Name	Status	Habitat Requirements	Potential to Occur in Project Site	Habitat Suitability/ Observations
<i>Macrotus californicus</i> California leaf-nosed bat	None/None G4/S3 SSC	Desert riparian, desert wash, desert scrub, desert succulent scrub, alkali scrub and palm oasis habitats. Needs rocky, rugged terrain with mines or caves for roosting.	None	No suitable desert or scrub habitat, caves or mines within the project site.
Status: Federal/State		CRPR (CNPS California Rare Plant Rank)		
FE = Federal Endangered		1A = Presumed Extirpated in California and either rare or extinct elsewhere		
FT = Federal Threatened		1B = Rare, Threatened, or Endangered in California and elsewhere		
PFT = Proposed Federal Threatened		2A = Presumed Extirpated in California but common elsewhere.		
FDL = Federal Delisted		2B = Rare, Threatened, or Endangered in California, but more common elsewhere		
SE = State Endangered		3 = Need more information (a Review List)		
ST = State Threatened		4 = Plants of Limited Distribution (a Watch List)		
SR = State Rare		CRPR Threat Code Extension		
SDL = State Delisted		.1 = Seriously threatened in California (>80% of occurrences threatened/high degree and immediacy of threat)		
SSC = CDFW Species of Special Concern		.2 = Moderately threatened in California (20-80% of occurrences threatened/moderate degree and immediacy of threat)		
FP = CDFW Fully Protected		.3 = Not very threatened in California (<20% of occurrences threatened/low degree and immediacy of threat or no current threats known)		
WL = CDFW Watch List				
Other Statuses				
G1 or S1	Critically Imperiled Globally or Subnationally (state)			
G2 or S2	Imperiled Globally or Subnationally (state)			
G3 or S3	Vulnerable to extirpation or extinction Globally or Subnationally (state)			
G4/5 or S4/5	Apparently secure, common and abundant			
GH or SH	Possibly Extirpated – missing; known from only historical occurrences but still some hope of rediscovery			
Additional notations may be provided as follows				
T – Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)				
Q – Questionable taxonomy that may reduce conservation priority				
? – Inexact numeric rank				

Attachment C

Site Survey Photographs – April 3, 2019



Photograph 1: Northeast edge of the project site. Photo facing south near the intersection of Valley Circle Boulevard and Ventura Boulevard.



Photograph 2: Overview of the central portion of the project site. Photo facing west along Long Valley Road.



Photograph 3: Northeast-facing view of the central portion of the project site along Long Valley Road.



Photograph 4: Overview of overhanging coast live oak woodland along Long Valley Road.



Photograph 5: Overview of western portion of the project site. Photo facing northwest along Long Valley Road.



Photograph 6: Overview of dirt lot in northwestern portion of the project site. Photo facing northwest from Long Valley Road.