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November 10, 2021

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SUBJECT: Biological Resources Assessment Addendum for the 841 Patricia Drive Project (ARCH-0040-2021; APN 052-520-063), City of San Luis Obispo, CA

David Wolff Environmental (DWE) is pleased to submit this Biological Resources Assessment Addendum (BRA Addendum) to the May 13, 2021 Biological Resources Assessment (BRA) for the 841 Patricia Drive residential development project (proposed project) in the City of San Luis Obispo (City), CA (APN 052-520-063; ARCH-0040-2021). This BRA Addendum has been prepared in response to the October 21, 2021 SWCA peer review email of the BRA and following the project site visit on October 22, 2021 with the project team, City, and SWCA staff. DWE Principal Ecologist David Wolff conducted a follow up field reconnaissance on October 28, 2021 to further evaluate project site existing conditions and analyze proposed project impacts to address the peer review comments. The following addresses the five biological resources comments from the October 21st SWCA BRA peer review email.

1.0 RIPARIAN IMPACTS FROM BRIDGE CONSTRUCTION

The proposed project includes a clear span bridge with footings placed above the active braided creek channel. No ground disturbance in the active braided creek channel bottom would occur. As shown on the attached Sheet L-1 approximately 17 small coast live oak saplings would be removed, and between 20-30 arroyo willow stems from four trees may need removal or pruning to place the bridge and footings. This is considered the maximum amount of vegetation removal needed and will be minimized to the extent feasible during construction.

In order to fully mitigate for the oak and willow tree riparian habitat removal, the proposed project includes planting of 20 coast live oak, 4 California bay laurel, 4 California sycamore 1-gallon trees, and 20 willow sprigs planted throughout the channel bottom as shown on attached Sheet L-1. Final planting locations will be field verified for optimal placement during construction. The proposed compensatory riparian mitigation will add plant species diversity and density to increase the riparian habitat values. Plantings will be provided supplemental irrigation for three years, and maintained and monitored for five years, to meet an 80 percent survival success criteria after two years without supplemental irrigation.

2.0 SAN LUIS OBISPO (CAMBRIA) MORNING GLORY

The BRA rare plant survey observed the CNPS List 4.2 (a watch list of plants with limited distribution) San Luis Obispo (Cambria) morning glory (*Calystegia subacaulis* ssp. *episcopalis*) sparsely on the western side of the creek with more frequent occurrences on the eastern grassland flat. Interesting occurrence because the site has been previously disturbed from fill and installation of a sewer line. The San Luis Obispo (Cambria) morning glory is a species of limited distribution but has current distribution from San Luis Obispo County to northwestern Santa Barbara County, with historic herbaria records as far north as Sonoma County. Recent observations in the record have found it throughout coastal and inland San Luis Obispo County reducing the significance of its occurrence and local rarity at any one location. The CNPS recognized the greater range and distribution of this species and reduced its rarity listing from List 1.B. to List 4.2 in 2011.

David Wolff discussed the matter of impacts on the San Luis Obispo (Cambria) morning glory with City Natural Resource Manager Bob Hill. It was agreed that while this species was a CNPS List 1.B. at the time the Conservation and Open Space Element was adopted in 2006, its current status as a List 4.2 plant in 2011 should prevail in any current project analysis. Given it has been widely observed throughout the City (and beyond), and the infill nature of this previously disturbed project site, it was further agreed that impacts on the San Luis Obispo (Cambria) morning glory would be considered less than significant and not require any mitigation.

3.0 CALIFORNIA RED-LEGGED FROG

The BRA established the onsite creek as a remnant above ground reach emanating from a culverts on the project site and undergrounding several block away near Westmont Avenue. There does not appear to be any readily identifiable connection to any downstream waters or aquatic habitat. "Upstream" is urban runoff and the rapid draining steep Bishop Peak hillside. This remnant reach of creek is surrounded by residential development with the steep hills of Bishop Peak to the west. Review of aerial photography does not show any evidence of ponds in the surrounding hillsides or residential areas that could represent a source of California red-legged frogs to disperse and occupy the onsite reach of creek. Additionally, there is no undeveloped land around the project site (only residences) that could be an entry to overland movement by frogs should they occur somewhere in the surrounding lands (again no suitable aquatic habitat identified in aerial photographs).

The DWE field survey on October 28th followed an approximately 1.4-inch rainfall event several days earlier. There was only evidence of flows from the rain event within the narrow braided channels with no sheet flow across the floodplain. It appeared there was barely enough flows even from the short but substantial rain event to push accumulated leaf litter

beyond the limits of the braided narrow low-flow channels. No standing or pooled water remained from the obvious rain event flows on the project site supporting the BRA findings that the site lacks the required aquatic habitat for the California red-legged frog. The proposed project would not alter the creek channel or change any of the inputs so post project conditions would be unchanged and remain lacking suitable aquatic habitat to attract any California red-legged frogs should they even occur from within either the limited available above ground creek system, or the surrounding lands.

4.0 TREE IMPACTS

The attached Sheet L-1 shows the locations and quantities of the maximum number of trees likely needing removal for the bridge construction. Section 1.0 above provides a conceptual tree replacement compensatory mitigation plan with a five-year success monitoring period. Sheet L-1 also provides a conceptual planting plan for the replacement trees also described in Section 1.0 above.

5.0 NATIONAL WETLANDS INVENTORY MAPPING

The National Wetlands Inventory is a very broad-brush remote sensing approach to mapping wetlands and other waters. The unnamed drainage running along the existing driveway referred to in the peer review comments appears to be a mapping convention to “connect the dots” between the steep hillside drainage pattern and the readily identifiable creek corridor. BRA Figure 4 Photo 1 provides a view west down the driveway elevated above the street to the hillside demonstrating the lack of any connecting waters. This determination is also shown on BRA Figure 3 and was corroborated during the October 22nd City, SWCA, and project team field meeting.

Thank you for the opportunity to provide this BRA Addendum to address the peer review comments for use in completing the City’s environmental review for the proposed project.

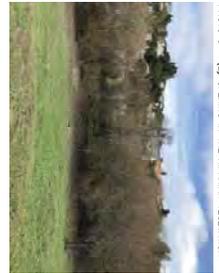
Very truly yours,



David K. Wolff
DWE Principal Ecologist

ATTACHMENT:

SHEET L-1 – TREE SURVEY (PARTIAL) AND REVEGETATION PLAN



(E) TREE LEGEND - Area of Disturbance

TREES BOTANICAL / COMMON NAME	QTY.	SIZE	NOTES
QAG Quercus agrifolia	17	14"	4-6' CANOES
CKM Umbellularia californica	1	14"	4-6' CANOES
CAWY CALEY DOGWOOD	20	3-4"	8-20" CANOES
PAH Pisonia excelsa	4		
CSY CA Sycamore	4		
SAL Salix lasiolepis	20		
AWY AEROCYTO WILLOW	20		

POTENTIALLY AFFECTED RIPARIAN CORRIDOR VEGETATION:
 The plan depicts existing vegetation that may be removed as a result of the proposed development. Existing vegetation patterns shall not be altered, with disturbance occurring only in the bridge footings. Removal from other agencies (e.g., Army Corps of Engineers, USF & WS) shall be coordinated with the appropriate agencies. Quality Control shall be approved by the project biologist, as required.



PLANT LEGEND

TREES BOTANICAL / COMMON NAME	WILCOXS QTY.	SIZE	NOTES
QAG Quercus agrifolia	VI	20	10 EA. SHIP OF CREEK CORRIDOR
CKM Umbellularia californica	L	4	2 EA. SHIP OF CREEK CORRIDOR
CAWY CALEY DOGWOOD	M	4	2 EA. SHIP OF CREEK CORRIDOR
PAH Pisonia excelsa	M	4	2 EA. SHIP OF CREEK CORRIDOR
CSY CA Sycamore	M	4	2 EA. SHIP OF CREEK CORRIDOR
SAL Salix lasiolepis	H	20	SPRINGS INSTAL THROUGH-OUT CORRIDOR
AWY AEROCYTO WILLOW	H	20	SPRINGS INSTAL THROUGH-OUT CORRIDOR

- PLANTING NOTES
1. ALL NEW PLANT MATERIAL SHALL BE FIELD LOCATED BY THE MUNICIPAL ECOLOGIST WITH THE APPROVAL OF THE CITY.
 2. PLANTING MATERIAL SHALL BE PROTECTED FOR 3 YEARS, THE FOLLOWING 2 YEARS OF PROTECTION SHALL BE PROVIDED FOR 5 YEARS.
 3. ALL NEW PLANT MATERIAL SHALL BE MONITORED FOR A PERIOD OF 5 YEARS, AND SHALL HAVE AN 80% SURVIVAL SUCCESS RATE.

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LANDSCAPE ARCHITECTS S&L

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Project: MICHAELS RESIDENCE

841 PATRICIA SAN LUIS OBISPO CA 95001

Client: ERIC & JULIE MICHAELS

843 MISSION ST. SAN LUIS OBISPO CA 95005

Site Location: TREE SURVEY (PARTIAL) & REVEGETATION PLAN

Date: 11/05/21
 Revised: 11/05/21
 Job No.: 20-0090
 Sheet: L-1 of 1