State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
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GAVIN NEWSOM, Governor CHARLTON H. BONHAM, Director



May 28, 2024

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Eric Marlatt, Assistant Director of Planning and Community Development City of Santa Cruz 809 Center Street, Room 101 Santa Cruz, CA 95060 EMarlatt@santacruzca.gov

Subject: 908 Ocean Street Mixed Use Development, Notice of Preparation of a Draft

Environmental Impact Report, SCH No. 2024050531, City and County of

Santa Cruz

Dear Mr. Marlatt:

The California Department of Fish and Wildlife (CDFW) has reviewed the City of Santa Cruz (City) Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the 908 Ocean Street Mixed Use Development project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the State. Please be advised, by law, CDFW may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW is providing the City, as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (See: Cal. Code Regs., tit. 14, § 15082, subd. (b).).

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802). For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority, if the Project impacts the bed, channel or bank of any river, stream or lake within the state (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in "take" as defined by state law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86.) CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any Project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. Findings of consideration under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5

(regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION AND LOCATION SUMMARY

Proponent: High Street Residential

Objective: The objective of the Project is to remove trees and demolish existing commercial and residential buildings on an existing 14.5-acre parcel to construct a mixed-use development with 389 residential units and 9,570 square feet (sq ft) of commercial space. Primary Project activities include tree removal, demolition, grading, and earthwork.

Location: 908 Ocean Street (APNs: 008-331-03, -04, -05, -06, -07, -08, -12, -13, -14, -15, -25, -26, -27, -28, -29, -30, -31, -32, -35, -41, -45) in the City and County of Santa Cruz, California. Cross Streets: Ocean Street and Water Street. CPS Latitude and Longitude coordinates: 36.980772, -122.021311.

Timeframe: Fall 2025 to March 2028

The CEQA Guidelines (§§15124 & 15378) require that the draft EIR incorporate a full Project description, including reasonably foreseeable future phases of the Project, and that contains sufficient information to evaluate and review the Project's environmental impact. Please include a complete description of the following Project components in the Project description including, but not limited to, the below information.

- Land use changes resulting from, for example, rezoning certain areas.
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes.
- Area and plans for any proposed buildings/structures, ground-disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment, and crew sizes.

ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any

alternatives identified in the draft EIR (CEQA Guidelines, §§15125 & 15360). CDFW recommends the draft EIR provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, §15380). The draft EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species or sensitive natural communities that are known to occur, or have the potential to occur in or near the Project site, include, but are not limited to: the species listed in Attachment A.

Habitat descriptions and species profiles included in the draft EIR should include robust information from multiple sources: aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System; California Aquatic Resources Inventory; and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDB). Only with sufficient data and information can the City adequately assess which special-status species are likely to occur in the Project vicinity.

CDFW recommends surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: https://www.wildlife.ca.gov/Conservation/Survey-Protocol.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (http://www.cnps.org/cnps/rareplants/inventory/), should also be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and include the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants available at: https://www.wildlife.ca.gov/Conservation/Plants.

IMPACT ANALYSIS AND MITIGATION MEASURES

The CEQA Guidelines (§15126.2) necessitate the draft EIR discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project. This includes evaluating and describing impacts such as:

 Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;

- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence;
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features; and
- Impacts both from construction and operation of the Project.

The CEQA document also should identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to each impact (CEQA Guidelines, §15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact (e.g., reduction of available habitat for a listed species) should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the City, as the Lead Agency, to consider and describe in the draft EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the potential direct, indirect, and cumulative impacts of the Project. (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370.) This should include a discussion of take avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with the USFWS, the National Marine Fisheries Service and CDFW. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

Fully protected species, such as white-tailed kite (*Elanus leucurus*), California black rail (*Laterallus jamaicensis coturniculus*), may not be taken or possessed at any time except in limited circumstances (Fish & G. Code, §§ 3511, 4700, 5050, & 5515). Therefore, the draft EIR should include measures to completely avoid take of fully protected species.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to prepare subsequent CEQA documents or to make supplemental environmental determinations.

(Pub. Resources Code, § 21003, subd. (d) & (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNDDB field survey form can be filled out and submitted online here: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found here: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

ENVIRONMENTAL DOCUMENT FILING FEES

CDFW anticipates that the proposed Project will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See: Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP in order to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Emily Galli, Environmental Scientist at Emily.Galli@wildlife.ca.gov or Wesley Stokes, Senior Environmental Scientist (Supervisory) at Wesley.Stokes@wildlife.ca.gov.

Sincerely.

—DocuSigned by: Erin Chappell

Erin Chappell Regional Manager Bay Delta Region

Attachment A: 908 Ocean Street, Santa Cruz, CA – 9 Quad Search (California Natural Diversity Database, Accessed May 23, 2024)

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2024050531)

		Federal		CDFW	CA Rare
Scientific Name	Common Name	Status	State Status	Status	Plant Rank
Ambystoma macrodactylum croceum	Santa Cruz long-toed salamander	Endangered	Endangered	FP	-
Dicamptodon ensatus	California giant salamander	None	None	SSC	-
Aneides niger	Santa Cruz black salamander	None	None	SSC	-
	foothill yellow-legged frog - central coast				
Rana boylii pop. 4	DPS	Threatened	Endangered	-	-
Rana draytonii	California red-legged frog	Threatened	None	SSC	-
Neochthonius imperialis	Empire Cave pseudoscorpion	None	None	-	-
Meta dolloff	Dolloff Cave spider	None	None	-	-
Accipiter cooperii	Coopers hawk	None	None	WL	-
Accipiter striatus	sharp-shinned hawk	None	None	WL	-
Aquila chrysaetos	golden eagle	None	None	FP WL	-
Circus hudsonius	northern harrier	None	None	SSC	-
Elanus leucurus	white-tailed kite	None	None	FP	-
Haliaeetus leucocephalus	bald eagle	Delisted	Endangered	FP	-
Brachyramphus marmoratus	marbled murrelet	Threatened	Endangered	-	-
Ptychoramphus aleuticus	Cassins auklet	None	None	SSC	-
Chaetura vauxi	Vauxs swift	None	None	SSC	-
Cypseloides niger	black swift	None	None	SSC	-
Ardea herodias	great blue heron	None	None	-	-
Gymnogyps californianus	California condor	Endangered	Endangered	FP	-
Charadrius montanus	mountain plover	None	None	SSC	-
Charadrius nivosus nivosus	western snowy plover	Threatened	None	SSC	-
Falco peregrinus anatum	American peregrine falcon	Delisted	Delisted	-	-
Spinus lawrencei	Lawrences goldfinch	None	None	-	-
Progne subis	purple martin	None	None	SSC	-
Riparia riparia	bank swallow	None	Threatened	-	-
Agelaius tricolor	tricolored blackbird	None	Threatened	SSC	-
Icteria virens	yellow-breasted chat	None	None	SSC	-
Lanius ludovicianus	loggerhead shrike	None	None	SSC	-

Pandion haliaetus	osprey	None	None	WL	-
Geothlypis trichas sinuosa	saltmarsh common yellowthroat	None	None	SSC	-
Setophaga petechia	yellow warbler	None	None	SSC	-
Passerculus sandwichensis alaudinus	Bryants savannah sparrow	None	None	SSC	-
Pelecanus occidentalis californicus	California brown pelican	Delisted	Delisted	-	-
Nannopterum auritum	double-crested cormorant	None	None	WL	-
Coturnicops noveboracensis	yellow rail	None	None	SSC	-
Laterallus jamaicensis coturniculus	California black rail	None	Threatened	FP	-
Athene cunicularia	burrowing owl	None	None	SSC	-
Contopus cooperi	olive-sided flycatcher	None	None	SSC	-
Empidonax traillii	willow flycatcher	None	Endangered	-	-
Calasellus californicus	An isopod	None	None	-	-
Linderiella occidentalis	California linderiella	None	None	-	-
Stygobromus imperialis	Empire Cave amphipod	None	None	-	-
Stygobromus mackenziei	Mackenzies Cave amphipod	None	None	-	-
Eucyclogobius newberryi	tidewater goby	Endangered	None	SSC	-
Thaleichthys pacificus	eulachon	Threatened	None	SSC	-
Entosphenus tridentatus	Pacific lamprey	None	None	SSC	-
Oncorhynchus gorbuscha	pink salmon	None	None	-	-
Oncorhynchus kisutch pop. 4	coho salmon - central California coast ESU	Endangered	Endangered	-	-
Oncorhynchus mykiss irideus pop. 8	steelhead - central California coast DPS	Threatened	None	SSC	-
Trimerotropis infantilis	Zayante band-winged grasshopper	Endangered	None	-	-
Adela oplerella	Oplers longhorn moth	None	None	-	-
Bombus caliginosus	obscure bumble bee	None	None	-	-
Bombus crotchii	Crotchs bumble bee	None	Candidate Endangered	-	-
Bombus occidentalis	western bumble bee	None	Candidate Endangered	-	-
Cicindela hirticollis gravida	sandy beach tiger beetle	None	None	-	-
Cicindela ohlone	Ohlone tiger beetle	Endangered	None	-	-

Scaphinotus behrensi	Behrens snail-eating beetle	None	None	-	-
Euphilotes enoptes smithi	Smiths blue butterfly	Endangered	None	-	-
Lytta moesta	moestan blister beetle	None	None	-	-
	monarch - California overwintering				
Danaus plexippus plexippus pop. 1	population	Candidate	None	-	-
Polyphylla barbata	Mount Hermon (=barbate) June beetle	Endangered	None	-	-
Philanthus nasalis	Antioch specid wasp	None	None	-	-
Coelus globosus	globose dune beetle	None	None	-	-
Neotoma fuscipes annectens	San Francisco dusky-footed woodrat	None	None	SSC	-
Dipodomys venustus venustus	Santa Cruz kangaroo rat	None	None	-	-
Enhydra lutris nereis	southern sea otter	Threatened	None	FP	-
Taxidea taxus	American badger	None	None	SSC	-
Sorex vagrans paludivagus	Monterey vagrant shrew	None	None	-	-
Antrozous pallidus	pallid bat	None	None	SSC	-
Corynorhinus townsendii	Townsends big-eared bat	None	None	SSC	-
Lasiurus cinereus	hoary bat	None	None	-	-
Lasiurus frantzii	western red bat	None	None	SSC	-
Myotis yumanensis	Yuma myotis	None	None	-	-
Haliotis cracherodii	black abalone	Endangered	None	-	-
Haliotis kamtschatkana	pinto abalone	None	None	-	-
	mimic tryonia (=California brackishwater				
Tryonia imitator	snail)	None	None	-	-
Margaritifera falcata	western pearlshell	None	None	-	-
		Proposed			
Emys marmorata	western pond turtle	Threatened	None	SSC	-
North Central Coast Drainage	North Central Coast Drainage				
Sacramento Sucker/Roach River	Sacramento Sucker/Roach River	None	None	-	-
North Central Coast Short-Run Coho	North Central Coast Short-Run Coho				
Stream	Stream	None	None	-	-
Maritime Coast Range Ponderosa Pine	Maritime Coast Range Ponderosa Pine	Nama	Nama		
Forest	Forest	None	None	-	-
Monterey Pine Forest	Monterey Pine Forest	None	None	-	-

Northern Coastal Salt Marsh	Northern Coastal Salt Marsh	None	None	-	-	
Northern Interior Cypress Forest	Northern Interior Cypress Forest	None	None	-	-	
Northern Maritime Chaparral	Northern Maritime Chaparral	None	None	-	-	
Anomobryum julaceum	slender silver moss	None	None	-		4.2
Fissidens pauperculus	minute pocket moss	None	None	-	1B.2	
Dacryophyllum falcifolium	tear drop moss	None	None	-	1B.3	
Mielichhoferia elongata	elongate copper moss	None	None	-		4.3
Perideridia gairdneri ssp. gairdneri	California Gairdners yampah	None	None	-		4.2
Sanicula hoffmannii	Hoffmanns sanicle	None	None	-		4.3
Holocarpha macradenia	Santa Cruz tarplant	Threatened	Endangered	-	1B.1	
Lasthenia californica ssp. macrantha	perennial goldfields	None	None	-	1B.2	
Micropus amphibolus	Mt. Diablo cottonweed	None	None	-		3.2
Microseris paludosa	marsh microseris	None	None	-	1B.2	
Monolopia gracilens	woodland woollythreads	None	None	-	1B.2	
Pentachaeta bellidiflora	white-rayed pentachaeta	Endangered	Endangered	-	1B.1	
Senecio aphanactis	chaparral ragwort	None	None	-	2B.2	
Stebbinsoseris decipiens	Santa Cruz microseris	None	None	-	1B.2	
Azolla microphylla	Mexican mosquito fern	None	None	-		4.2
Amsinckia lunaris	bent-flowered fiddleneck	None	None	-	1B.2	
Plagiobothrys chorisianus var.						
chorisianus	Choris popcornflower	None	None	-	1B.2	
Plagiobothrys chorisianus var. hickmanii	Hickmans popcornflower	None	None	-		4.2
Plagiobothrys diffusus	San Francisco popcornflower	None	Endangered	-	1B.1	
Arabis blepharophylla	coast rockcress	None	None	-		4.3
Erysimum franciscanum	San Francisco wallflower	None	None	-		4.2
Erysimum teretifolium	Santa Cruz wallflower	Endangered	Endangered	-	1B.1	
Eastwoodiella californica	swamp harebell	None	None	-	1B.2	
Arenaria paludicola	marsh sandwort	Endangered	Endangered	-	1B.1	
Hesperocyparis abramsiana var.						
abramsiana	Santa Cruz cypress	Threatened	Endangered	-	1B.2	
Carex comosa	bristly sedge	None	None	-	2B.1	

Carex saliniformis	deceiving sedge	None	None	-	1B.2	
Arctostaphylos andersonii	Andersons manzanita	None	None	-	1B.2	
Arctostaphylos glutinosa	Schreibers manzanita	None	None	-	1B.2	
Arctostaphylos ohloneana	Ohlone manzanita	None	None	-	1B.1	
Arctostaphylos silvicola	Bonny Doon manzanita	None	None	-	1B.2	
Astragalus agnicidus	Humboldt County milk-vetch	None	Endangered	-	1B.1	
Hoita strobilina	Loma Prieta hoita	None	None	-	1B.1	
Hosackia gracilis	harlequin lotus	None	None	-		4.2
Trifolium buckwestiorum	Santa Cruz clover	None	None	-	1B.1	
Trifolium polyodon	Pacific Grove clover	None	Rare	-	1B.1	
Iris longipetala	coast iris	None	None	-		4.2
Monardella sinuata ssp. nigrescens	northern curly-leaved monardella	None	None	-	1B.2	
Calochortus uniflorus	pink star-tulip	None	None	-		4.2
Malacothamnus arcuatus	arcuate bush-mallow	None	None	-	1B.2	
Sidalcea malachroides	maple-leaved checkerbloom	None	None	-		4.2
Toxicoscordion fontanum	marsh zigadenus	None	None	-		4.2
Calandrinia breweri	Brewers calandrinia	None	None	-		4.2
Calyptridium parryi var. hesseae	Santa Cruz Mountains pussypaws	None	None	-	1B.1	
Cypripedium fasciculatum	clustered ladys-slipper	None	None	-		4.2
Cypripedium montanum	mountain ladys-slipper	None	None	-		4.2
Piperia candida	white-flowered rein orchid	None	None	-	1B.2	
Piperia michaelii	Michaels rein orchid	None	None	-		4.2
Aphyllon robbinsii	Robbins broomrape	None	None	-	1B.1	
Castilleja ambigua var. ambigua	johnny-nip	None	None	-		4.2
Pedicularis dudleyi	Dudleys lousewort	None	Rare	-	1B.2	
Eschscholzia hypecoides	San Benito poppy	None	None	-		4.3
Mimulus rattanii ssp. decurtatus	Santa Cruz County monkeyflower	None	None	-		4.2
Pinus radiata	Monterey pine	None	None	-	1B.1	
Collinsia multicolor	San Francisco collinsia	None	None	-	1B.2	
Penstemon rattanii var. kleei	Santa Cruz Mountains beardtongue	None	None	-	1B.2	
Agrostis blasdalei	Blasdales bent grass	None	None	-	1B.2	

Elymus californicus	California bottle-brush grass	None	None	-		4.3
Leptosiphon aureus	bristly leptosiphon	None	None	-		4.2
Leptosiphon grandiflorus	large-flowered leptosiphon	None	None	-		4.2
Chorizanthe pungens var. hartwegiana	Ben Lomond spineflower	Endangered	None	-	1B.1	
Chorizanthe pungens var. pungens	Monterey spineflower	Threatened	None	-	1B.2	
Chorizanthe robusta var. hartwegii	Scotts Valley spineflower	Endangered	None	-	1B.1	
Chorizanthe robusta var. robusta	robust spineflower	Endangered	None	-	1B.1	
Eriogonum nudum var. decurrens	Ben Lomond buckwheat	None	None	-	1B.1	
Polygonum hickmanii	Scotts Valley polygonum	Endangered	Endangered	-	1B.1	
Ranunculus lobbii	Lobbs aquatic buttercup	None	None	-		4.2
Horkelia cuneata var. sericea	Kelloggs horkelia	None	None	-	1B.1	
Horkelia marinensis	Point Reyes horkelia	None	None	-	1B.2	

FE = Federally Endangered; FT = Federally Threatened; SE = State Endangered; ST = State Threatened; SFP = State Fully Protected; SSC = State Species of Special Concern

California Rare Plant Rank (CRPR)

- 1B = Rare, Threatened, or Endangered in California and Elsewhere
- 4 = Limited distribution or infrequent throughout a broader area in California.

CRPR Threat Ranks

- 0.1-Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- 0.2-Moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)
- 0.3-Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)