

Focused Plan Survey Results Memorandum





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To: Allison Pfefferkorn, Recreation Division Manager, City of Scotts Valley
From: Kimiya Ghadiri, Associate Biologist
Cc: Rico Lardizabal, Project Manager III, Verde Design, Inc.
Date: July 7, 2026

Re: 2026 Al Shugart Dog Park Focused Plant Survey Results

FOCUSED PLANT SURVEY

EMC Planning Group biologist Kimiya Ghadiri conducted focused plant surveys at the Al Shugart Dog Park in the City of Scotts Valley, Santa Cruz County, California ([Figure 1, Location Map](#)), on April 29, and June 13, 2026. The focused plant surveys were conducted in accordance with Mitigation Measure BIO-1 of the *Al Shugart Dog Park Administrative Draft Initial Study* (EMC Planning Group 2026). The survey area included the proposed project site as depicted in ([Figure 2, Focused Plant Survey Results/Habitat Map](#)).

Special-status plants with a potential to occur within to project site include:

- San Francisco popcornflower (*Plagiobothrys diffusus*), listed as endangered under the California Endangered Species Act (CESA) and California rare plant rank 1B.1, plants presumed extirpated in California and either rare or extinct elsewhere. This species is an annual herb that typically blooms from March to June.
- Scotts Valley polygonum (*Polygonum hickmanii*), federally-listed as endangered under the Federal Endangered Species Act (FESA), listed as endangered under CESA and California rare plant rank 1B.1, plants rare, threatened, or endangered in California and elsewhere. This species is

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an annual herb that typically blooms from May to August. The project site is within federally-designated critical habitat for this species as depicted in [Figure 2](#).

- Scotts Valley spineflower (*Chorizanthe robusta* var. *hartwegii*), federally-listed as endangered under FESA, and California Rare Plant Rank 1B.1, plants rare, threatened, or endangered in California and elsewhere. This species is an annual herb that blooms from April to July. The project site is within federally-designated critical habitat for this species as depicted in [Figure 2](#).

EXISTING CONDITIONS

The project site consists of the following vegetation and habitat types: annual grassland, purple needle grass grassland, creeping wild rye grassland, riparian, coyote brush scrub, acacia woodland, and ruderal vegetation. The portions of the project site with suitable habitat for special-status species include annual grassland, purple needle grass grassland, and creeping wild rye grassland, mainly occurring within the open field proposed for the dog park. Within the annual grassland, vegetation is dominated wild oats (*Avena* sp.), Italian rye grass (*Festuca perennis*), wild mustard (*Brassica* sp.), Fuller's teasel (*Dipsacus fullonum*), stinkwort (*Dittrichia graveolens*), bull thistle (*Cirsium vulgare*), prickly lettuce (*Lactuca serriola*), coast tarweed (*Madia sativa*), Spanish clover (*Acmispon americanus*), hairy hawkbit (*Leontodon saxatilis*), and sow thistle (*Sonchus oleraceus*). Within the purple needle grass (*Stipa pulchra*) grassland, vegetation consists of Fuller's teasel, wild oat, Spanish clover, scarlet pimpernel (*Anagallis arvensis*), prickly lettuce, and wild barley (*Hordeum* sp.). Within the creeping wildrye (*Elymus triticoides*) grassland, vegetation is mainly dominated by creeping wildrye and is sparsely vegetated with wild oat, wild barley, and field bindweed (*Convolvulus arvensis*). At the time of the reconnaissance-level surveys conducted on October 24, and November 7, 2025, all suitable habitat for special-status species was recently mowed. During the April and July 2026 focused plant surveys, portions of the project site, including the field for the proposed dog park were recently mowed, however the majority of the field for the proposed dog park was unmaintained. A list of species observed during the site visits can be found in [Appendix A, List of Species Observed](#). [Figure 3. Site Photographs](#), contain representative images of the project site and sensitive natural communities located within the project site.

METHODS

Prior to conducting focused plant surveys, special-status plant records were reviewed for the project vicinity. This review included data from the California Department of Fish and Wildlife's (CDFW) *California Natural Diversity Database* (CDFW 2026a), the U.S. Fish and Wildlife Service (USFWS) *Critical Habitat for Threatened & Endangered Species* online mapper (USFWS 2026a & USFWS 2025), and Calflora's *Observation Search* for each species (Calflora 2026). Based on this review, three special-status plant species were identified as having potential to occur within the project site. These species included: San Francisco popcornflower, Scotts Valley polygonum, and Scotts Valley spineflower. In addition, the project site falls within the USFWS-designated critical habitat for Scotts Valley spineflower and Scotts Valley polygonum.

Where possible, known reference populations of the target species in the project vicinity were first visited to verify that the species are observable. Focused plant surveys were conducted within two weeks of observing the reference population in full bloom. In addition to the review of special-status plant records listed above, Mark Bibbo, the Conservation Chair for the California Native Plant Society, was consulted for publicly accessible reference populations for target species within the vicinity of the project site (email message, April 8, 2026). EMC Planning Group biologist Kimiya Ghadiri, visited publicly accessible reference populations, where feasible, prior to conducting focused plant surveys.

EMC Planning Group biologist Kimiya Ghadiri conducted focused plant surveys for the project site for special-status plants on April 20 and July 1, 2026. Surveys were conducted in accordance with California Department of Fish and Wildlife and California Native Plant Society rare plant survey protocols (CDFW 2018 and CNPS 2001). Transects were surveyed to determine the presence or absence of special-status plants throughout the all portions of the project site. Transects were spaced at about 10 to 15 feet between intervals. If a special-status species was observed, it was mapped using a Trimble GPS unit and the ArcGIS Field Map Application.

RESULTS

None of the three special-status plant species with the potential to occur were observed within the project site during the focused surveys. However, two sensitive natural communities were documented during the focused plant survey efforts (See [Figure 2, Focused Plant Survey Results/Habitat Map](#)). Sensitive natural communities are communities that are of limited distribution statewide or within a county or region, and are often vulnerable to environmental effects of projects. CDFW's *California*

Natural Community List identifies which communities are considered sensitive based on the best available scientific information (CDFW 2026b). Purple needle grass grassland is defined as the sensitive natural community needle grass (CDFW 2026b). Needle grass is characterized by greater than 5% absolute cover of purple needlegrass as a characteristic dominant species in the herbaceous layer (CDFW 2026b). Creeping wildrye grassland is defined as the sensitive natural community ashy ryegrass (CDFW 2026b). Ashy ryegrass is characterized by greater than 30% creeping wildrye relative cover in the herbaceous layer (CDFW 2026b). Between the April 2026 and July 2026 survey efforts, purple needle grass and creeping wildrye patches expanded due to the recently unmaintained nature of the field proposed for the dog park.

Recommendations

Purple needle grass and creeping wildrye are within the development footprint for the proposed dog park. As described above, purple needle grass and creeping wildrye patches are expanding due to the recently unmaintained nature of the field proposed for the dog park. The following measure is recommended to determine if sensitive plant communities are present and if they can be avoided or if impacts may require further mitigation.

1. Sensitive Natural Communities – Arroyo Willow Thickets, Needle Grass, and Ashy Ryegrass. Prior to the start of construction, the project applicant should retain a qualified biologist to delineate and remap the boundaries of sensitive natural communities, arroyo willow thickets, needle grass, and ashy ryegrass within and adjacent to the project area. The biologist should flag and remap these areas in the field immediately prior to the start of construction to account for changes in the extent of sensitive natural community patches. Protective fencing (e.g., high-visibility construction fencing) should be installed along the flagged boundaries to establish environmentally sensitive area buffers. No ground disturbance, grading, or equipment staging should occur within the fenced environmentally sensitive area.

If avoidance of sensitive natural communities is not feasible, the applicant should prepare and implement a restoration and/or compensatory mitigation plan, in consultation with the California Department of Fish and Wildlife, to ensure no net loss of sensitive natural community functions or values. The plan may include measures such as replanting with locally appropriate native species, habitat restoration, or off-site conservation at a minimum 1:1 ratio.

Conclusion

No special-status plant species were found during focused botanical surveys conducted within the project site. However, surveys identified sensitive natural communities needle grass and ashy ryegrass within the field proposed for the dog park. To avoid or mitigate for the impacts to sensitive natural communities, a measure requiring additional surveys immediately prior to construction is recommended (see above).

Please contact us with any questions concerning this report.

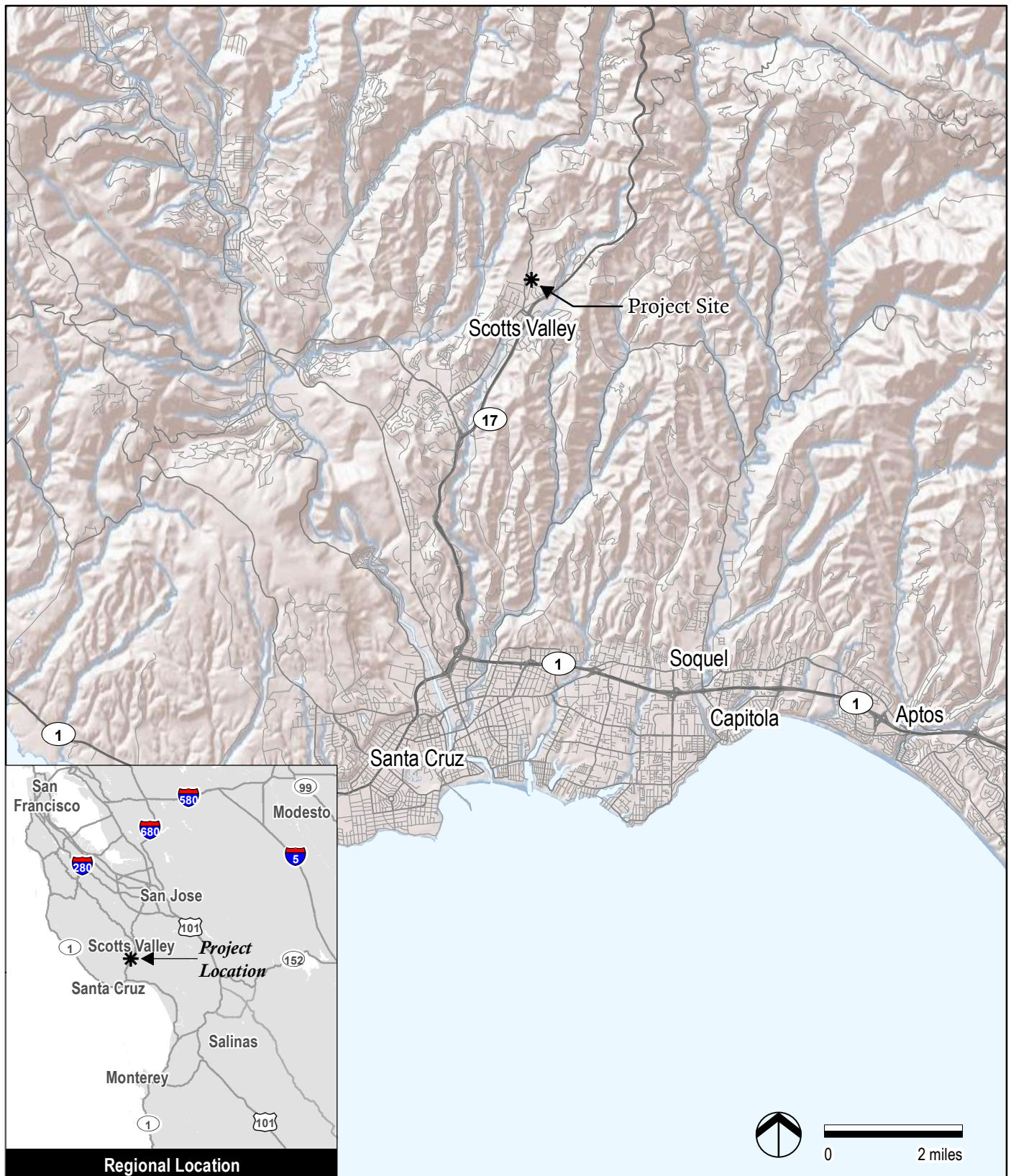
Sincerely,

Kimiya Ghadiri
Associate Biologist

Encl: Figure 1, Location Map
Figure 2, Focused Plant Survey Results/Habitat Map
Figure 3, Site Photographs
Attachment 1- List of Species Observed

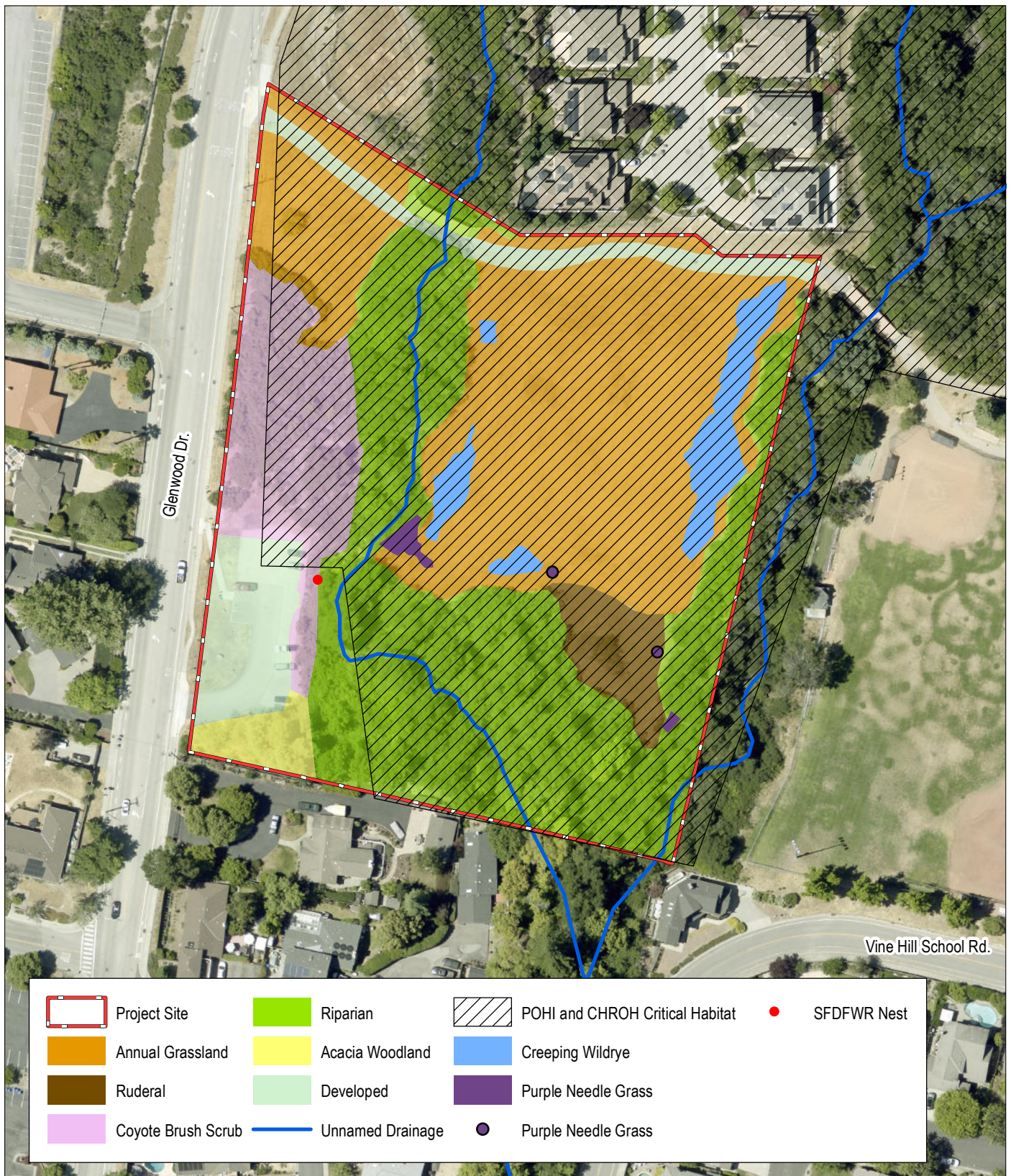
SOURCES

- Bibbo, Mark. Conservation Chair, California Native Plant Society. Email message with consultant to discuss reference populations in the project vicinity for target species. 8 April 2026.
- California Department of Fish and Wildlife (CDFW). 2026a. *California Natural Diversity Database (CNDDDB)* online database. Records of occurrence. Sacramento, California. Accessed April 2026. <https://wildlife.ca.gov/data/cnddb>
- CDFW. 2026b. *California Natural Community List*. Accessed April 2026.
- CDFW. 2018. *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities*. Sacramento, California.
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>
- Calflora. 2026. *Observation Search* online database. Records of occurrences. Accessed April 2026.
<https://www.calflora.org/entry/observ.html?track=m#srch=t&lpcli=t&taxon=Polygonum+hickmanii&chk=t&cch=t&cnabh=t&inat=r&cc=SCR>
- California Native Plant Society (CNPS). 2001. California Native Plant Society Botanical Survey Guidelines. Sacramento, California.
<https://www.cnps.org/plant-science/field-protocols-guidelines>
- Jepson Flora Project. 2017. The Jepson Online Interchange: California Floristics. Regents of the University of California. <http://ucjeps.berkeley.edu/interchange.html>
- Matthews, Mary Ann and Michael Mitchell. 2015. *The Plants of Monterey County: An Illustrated Field Key (Second Edition)*. Sacramento, CA.
- USFWS. 2026a. *Critical Habitat for Threatened and Endangered Species* online mapper. Accessed April 2026.
<https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>
- USFWS. 2025. *Information for Planning and Consultation (IPaC)* online database. List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project. Accessed October 2025.
<https://ipac.ecosphere.fws.gov/>



Source: ESRI 2014

Figure 1
Location Map



Source: ESRI 2026, Google Earth 2026, USFWS NWI 2026, USFWS 2026, Santa Cruz County 2026
 POHI= Scotts Valley Polygonum
 CHROH= Scotts Valley Spineflower
 SFDWWR= San Francisco Dusky-Footed Woodrat

Figure 2

Focused Plant Survey Results/Habitat Map

Al Shugart Dog Park Focused Plant Survey





Photo 1. Sensitive natural community, creeping wildrye grassland, with wild oat to the north near the walking path. April 20, 2026.



Photo 3. Sensitive natural community, purple needle grass grassland, on the southwest corner of the field proposed for the dog park. April 20, 2026.



Photo 5. Recently mowed portion of the field proposed for the dog park with Fuller's teasel resprouting and mature coyote brush. July 1, 2026



Photo 2. Sensitive natural community, creeping wildrye grassland, extending north to the walking path outcompeting what was previously non-native wild oats. July 1, 2026.



Photo 4. Fuller's teasel and nonnative annual grasses on the southeast corner of the field proposed for the dog park. April 20, 2026



Photo 6. Unmaintained annual grassland within the field proposed for the dog park. July 1, 2026

Source: EMC Planning Group 2026

Figure 3

Site Photographs

Al Shugart Dog Park Focused Plant Survey

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Appendix A

List of Species Observed

The following non-vascular and vascular plant species were observed in the project site by EMC Planning Group biologist during site visits conducted on April 20, and July 1, 2026.

Table 1 Non-Vascular and Vascular Plant Species Observed

Scientific Name	Common Name
Angiospermae – Flowering Plants	
Anacardiaceae – Cashew Family	
<i>Toxicodendron diversilobum</i>	Poison oak
Apiaceae – Umbel Family	
<i>Conium maculatum</i> *	Poison hemlock
Apocynaceae– Dogbane Family	
<i>Asclepias</i> sp.	milkweed
Asteraceae (Compositae) – Sunflower Family	
<i>Anthemis cotula</i>	Stinking chamomile
<i>Baccharis pilularis</i>	Coyote brush
<i>Carduus pycnocephalus</i> *	Italian thistle
<i>Cirsium vulgare</i> *	Bullthistle
<i>Dittrichia graveolens</i> *	Stinkwort
<i>Leontodon saxatilis</i> *	Hairy hawkbit
<i>Madua sativa</i>	Coastal tarweed
<i>Sonchus oleraceus</i> *	Sow thistle
Brassicaceae – Mustard Family	
<i>Brassica</i> sp.*	Common mustard
Convolvulaceae – Morning Glory Family	
<i>Convolvulus arvensis</i> *	Field bindweed
Cupressaceae– Cypress Family	
<i>Sequoia sempervirens</i>	Coast redwood
Dipsacaceae – Teasel Family	
<i>Dipsacus fullonum</i> *	Fuller's teasel

Fabaceae – Legume Family	
<i>Acacia</i> sp.*	Acacia Tree
Fabaceae – Legume Family	
<i>Acmispon americanus</i>	Spanish clover
Fagaceae – Beech Family	
<i>Quercus agrifolia</i>	Coast live oak
Geraniaceae – Geranium Family	
<i>Erodium cicutarium</i> *	Common stork's bill
Juglandaceae – Walnut Family	
<i>Juglans hindsii</i>	Northern California black walnut
Myrrsinaceae – Myrsine Family	
<i>Lysimachia arvensis</i> *	Scarlet pimpernel
Polemoniaceae – Phlox Family	
<i>Navarretia squarrosa</i>	Skunkweed
Polygonaceae – Knotweed Family	
<i>Rumex</i> sp*	Dock species
Rosaceae – Rose Family	
<i>Rubus ursinus</i>	California blackberry
Salicaceae – Willow Family	
<i>Salix lasiolepis</i>	Arroyo willow
Verbenaceae – Verbena Family	
<i>Verbena lasiostachys</i>	Western vervain
Monocotyledones - Monocots	
Juncaceae – Rush Family	
<i>Juncus patens</i>	Spreading rush
Poaceae – Grass Family	
<i>Avena</i> sp*	Wild oats
<i>Elymus triticoides</i>	Creeping wildrye
<i>Festuca perrenis</i> *	Italian rye grass
<i>Hordeum marinum</i> *	Seaside barley
<i>Lolium perenne</i> *	Italian rye grass
<i>Polypogon monspeliensis</i> *	Annual beard grass
<i>Stipa pulchra</i>	Purple needle grass

SOURCE: EMC Planning Group 2026

NOTES:

* Introduced species non-native to California or the survey area