









H. T. HARVEY & ASSOCIATES
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761 Fleming Avenue
Biological Resources Report

Project #4919-01

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Section 1. Introduction

This report describes the biological resources present within and adjacent to the proposed 761 Fleming Avenue project site, as well as the potential impacts of the proposed development on biological resources under the California Environmental Quality Act (CEQA). This report was prepared to facilitate CEQA review of the project.

1.1 Project Location and Description

The approximately 2.05-acre project site is located at 761 Fleming Avenue in San José, California (Figure 1), and the site is bounded by residential development on all sides (Figure 2). The project site is currently occupied by two private residences and associated ornamental woodland. A remnant, now-disconnected reach of historic stream occurs on the site, which has created seasonal wetlands within the low area of the site. The proposed project entails the subdivision of the existing parcel to create eight new lots, the demolition of one of the existing residences, and the construction of eight new single-family residences on the site.

1.2 Santa Clara Valley Habitat Plan Conditions

The project site is located within the Santa Clara Valley Habitat Plan (VHP) permit area, and the proposed project is a *covered project* under the VHP (ICF International 2012). As a result, the proposed project is required to implement conservation measures specified by VHP conditions. Therefore, all applicable VHP conditions (discussed in Section 5.1*,* below), including payment of VHP impact fees, will be considered part of the proposed project description rather than as mitigation measures.

Figure 1. Vicinity Map

Figure 2. Project Site

Section 2. Methods

2.1 Background Review

Prior to conducting field work, H. T. Harvey & Associates ecologists reviewed the project description, plans, and maps provided by David J. Powers & Associates through September 2024; aerial images (Google Inc. 2025); a USGS topographic map; the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB) (2025); the *Final Program Environmental Impact Report for the Envision San José 2020 General Plan* (City of San José 2017), the City of San José's General Plan *Envision San José 2040* (City of San José 2020); habitat and species information from the VHP (ICF International 2012); and other relevant reports, scientific literature, and technical databases. For the purposes of this report, the *project vicinity* is defined as the area within a 5-mile radius surrounding the project site.

In addition, for plants, we reviewed all species on current California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, 3 and 4 lists occurring in the project region, which is defined as the *Milpitas, California* USGS 7.5-minute quadrangles and surrounding eight quadrangles (*Mt. Day, Morgan Hill*, *Lick Observatory, Los Gatos*, *Santa Teresa Hills*, *San José East*, *San José West*, *Milpitas*, and *Calaveras Reservoir*) (CNPS 2025). In addition, we queried the CNDDB (2025) for natural communities of special concern that occur within the project footprint, and we perused records of birds reported in nearby areas on eBird (Cornell Lab of Ornithology 2025) and on the South-Bay-Birds List Serve (2025).

2.2 Site Visit

Following our background review, H. T. Harvey & Associates plant ecologist Vanessa Morales, B.S. and H. T. Harvey & Associates wildlife ecologist Dani Christensen, B.S. conducted a reconnaissance-level survey of the project site on December 3, 2024. The purpose of this survey was to identify existing biological conditions and the site's potential to support special-status species of plants and animals, as well as sensitive/regulated habitats such as jurisdictional wetlands and other waters of the U.S./state and riparian habitats. The survey included an assessment of habitats for special-status species both on the site and in adjacent areas (e.g., in developed and landscaped areas on adjacent properties) that could be impacted either directly or indirectly by proposed activities, as well as an assessment of adjacent habitats that could potentially support source populations of sensitive species that could then disperse onto the project site.

Section 3. Environmental Setting

3.1 General Project Area Description

Historical aerial imagery indicates that the project site has long supported woodland (Google Inc. 2025). A paved access road is present along the northeastern portion of the site that leads to residences in the southeastern part of the existing parcel.

Elevations on the project site range from approximately 216 to 226 feet above sea level (Google Earth 2025). The Natural Resource Conservation Service has mapped one soil unit on the project site: Urbanland-Altamont-Alo complex, 15 to 30% slopes (Natural Resource Conservation Service 2025). This soil type has a variable profile and is considered well-drained and not ideal for farmland.

3.2 Land Cover

As described above, biotic habitats within the project footprint were classified according to the land cover classification system described in the VHP (ICF International 2012), with modifications based upon site conditions verified during the field survey. The reconnaissance-level survey identified three land cover types within the project footprint: seasonal wetland, urban/suburban, and ornamental woodland (Figure 3). These land cover types are described in detail below.

3.2.1 Seasonal Wetland

Vegetation. Seasonal wetland habitat occupies approximately 0.23 acre of the project site (Photo 1). Even though a formal wetland delineation was not conducted during the survey, all wetland parameters were observed. At the time of the reconnaissance survey, this habitat had shallow surface water present, which did not exceed 1 foot in depth. No culvert was found on the project site nor was there any evidence of an active creek supplying these wetlands with surface water from an active creek channel. The wetlands were not associated with indicators of regular flow, and instead occupy a depressional area.



Photo 1. Representative photo of seasonal wetland habitat present within the project site.

The primary hydrology sources for this seasonal wetland appear to be a combination of natural drainage to a locally low area, and anthropogenic inputs. In the eastern portion of the wetland, old irrigation systems, including hoses and sprinklers, were present, although these were not active at the time of the survey.

Figure 3. Biotic Habitats

Along with surface water being a hydrology indicator for this wetland, oil sheen, aquatic invertebrates, and hydrogen sulfide, the last of which is also an indicator for hydric soils, were also present at the time of the survey. Dominant plant species in this habitat include Himalayan blackberry (*Rubus armeniacus*), as well as hydrophytic plants such as watercress (*Nasturtium officinale*), flat lovesedge (*Cyperus eragrostis*), cattails (*Typha angustifolia*), prostrate knotweed (*Polygonum aviculare*), and duckweed (*Lemna* sp.). In the overstory of the freshwater wetlands, red willow (*Salix laevigata*) was the dominant tree species.

Wildlife. Wildlife use of the freshwater wetlands on the project site is limited by the limited extent and shallow nature of the wetlands and the isolation of this habitat from more extensive wetlands and other natural habitats in the region. As a result, some of the wildlife species associated with extensive wetlands in the South Bay, such as red-winged blackbird (*Agelaius phoeniceus*) or marsh wren (*Cistothorus palustris*), are absent from the wetlands on the project site.

With the exception of the song sparrow (*Melospiza melodia*), a common songbird found in wetland and riparian habitats in the region, bird species that occur on the site are primarily associated with surrounding developed and ornamental woodland areas and use the wetlands on the site for foraging. These include the native California towhee (*Melozone crissalis*), American robin (*Turdus migratorius*), bushtit (*Psaltriparus minimus*), Bewick's wren (*Thryomanes bewickii*), Anna's hummingbird (*Calypte anna*), hairy woodpecker (*Dryobates villosus*), and American crow (*Corvus brachyrhynchos*). Small numbers of these common bird species may nest in the wetland vegetation and trees within this habitat. Winter visitors (i.e., non-breeding birds) that may forage within the small wetland areas on the site include the hermit thrush (C*atharus guttatus*), yellow-rumped warbler (*Setophaga coronata*), and ruby-crowned kinglet (*Corthylio calendula*).

Other wildlife found in this habitat include the native raccoon (*Procyon lotor*), California vole (*Microtus californicus*), terrestrial garter snake (*Thamnophis atratus*), and Pacific chorus frog (*Pseudacris regilla*), as well as the nonnative house mouse (*Mus musculus*). Common species of bat, such as the Mexican free-tailed bat (*Tadarida brasiliensis*) may forage aerially over this habitat for insects. However, the willows in this habitat do not provide large cavities that could support large bat roosts nor were they mature enough to provide dense foliage for leaf-roosting bats.

3.2.2 Ornamental Woodland



Photo 2. Representative photo of ornamental woodland habitat present within the project site.

Vegetation. The most dominant habitat onsite is ornamental woodland (1.26 acres) (Photo 2). This habitat is dominated by mature valley oak (*Quercus lobata*), Mexican fan palm (*Washingtonia robusta*), and red iron eucalyptus (*Eucalyptus sideroxylon*) trees in the overstory. The understory of the ornamental woodland comprised mainly of leaf duff, English ivy (*Hedera helix*), wild oats (*Avena* sp.) and bromes (*Bromus* sp.). Within the woodland was a small, abandoned shed filled with pots and lumber. On the eastern portion of the site, non-native ornamental bamboo (*Bambusa* sp.) is present in bordering the ornamental woodland and suburban homes. This habitat is bisected by an existing road and dirt lot that runs east to west into suburban homes.

Wildlife. Woodlands dominated by oaks typically support diverse animal communities in California. Valley oaks provide complex branching growth that create shelter for wildlife species, and these trees produce mast crops that are an important food source for many birds and mammals. The ornamental woodland on site is comprised of multi-layered vegetation, creating attractive habitat for many common wildlife species associated with oak and ornamental woodlands, as well as the developed habitats nearby.

In addition to the species mentioned in Section 3.2.1, above, native resident birds such as the acorn woodpecker (*Melanerpes formicivorus*), Nuttall's woodpecker (*Picoides nuttallii*), California scrub-jay (*Aphelocoma californica*), northern mockingbird (*Mimus polyglottos*), chestnut-backed chickadee (*Poecile rufescens*), and house finch (*Haemorhous mexicanus*) may nest and forage in shrubs, oaks, and other trees on the project site. Other birds expected to use this habitat are the wintering cedar waxwing (*Bombycilla cedrorum*), white-crowned sparrow (*Zonotrichia leucophrys*), and red-breasted sapsucker (*Sphyrapicus ruber*), as well as summer residents such as hooded oriole (*Icterus cucullatus*) and migrants such as western tanager (*Piranga ludoviciana*).

Burrows of native Botta's pocket gophers (*Thomomys bottae*) were observed in this habitat during the site visit, and several nests of the nonnative eastern gray squirrel (*Sciurus carolinensis*) were present in the trees. These mammals are an important component of the woodland community, providing a prey base for diurnal and nocturnal raptors and terrestrial predators. Other rodent species that can potentially occur in the woodland habitat on the site include the California vole (*Microtus californicus*) and deer mouse (*Peromyscus maniculatus*). Diurnal raptors such as red-shouldered hawks (*Buteo lineatus*) forage for these small mammals on the site during the day, and at night nocturnal species, such as barn owls (*Tyto alba*) and great-horned owls (*Bubo virginianus*), will forage for nocturnal rodents. These species could also potentially nest in the woodland present on the site, but no active or inactive diurnal raptor nests were detected during the site visit. Several of the large Mexican

fan palms, however, show evidence of whitewash and animal prey pellets underneath, indicating that these trees may be a roost for an owl such as the barn owl, and palms are known nest trees for barn owls.

Other mammals such as the nonnative Virginia opossum (*Didelphis virginianus*) and domestic cat (*Felis catus*), as well as the native black-tailed deer (*Odocoileus hemionus*), may forage in these woodlands. Several reptile species may occur in the understory, including the western fence lizard (*Sceloporus occidentalis*) and gopher snake (*Pituophis catenifer*). No cavities or crevices were observed in trees or other structures on the site that provide high-quality roosting habitat for bats, were observed during the site visit.

3.2.3 Urban/Suburban

Vegetation. Urban/suburban land cover (0.56 acre) is comprised of a paved road, residential homes, and a dirt lot. This habitat type is mainly found on the eastern portion of the project site and has an overstory comprised of the tree species that are dominant in the ornamental woodland habitat. There is little understory vegetation in this habitat type due to the hardscape, aside from landscaping surrounding the residences. Within the middle of the dirt lot there is an ornamental grape trellis with grape vines (*Vitis vinifera*) present.



Photo 3. Representative photo of the urban/suburban habitat present within the project site.

Wildlife. Wildlife found using the urban/suburban land cover is generally similar to the wildlife community found in the surrounding ornamental woodland habitat. However, wildlife use of the urban/suburban land cover is expected to be lower than the surrounding habitat, as paved roads and residential dirt lots have lower habitat values for wildlife than natural habitat. Birds such as the American crow, California towhee, and white-crowned sparrow forage in this habitat, and snakes such as the terrestrial garter snake may bask on the road. The residences may provide nesting opportunities for house finches and mourning doves, which may build nests on ledges, ornamental wreaths, or lamp fixtures on the house. However, in general, this habitat's overall value to wildlife is lower than the surrounding habitat as it provides less vegetative structure and thus, for most species, fewer foraging and nesting opportunities. We examined the outside of the existing residences for evidence of bat use, and found no evidence of bat ingress/egress (no openings, cracks, evidence of guano or urine staining) to indicate the presence of large bat roosts.

3.3 Wildlife Movement

Wildlife movement within and in the vicinity of the project footprint takes many forms, and is different for the various suites of species associated with these lands. Bird and bat species move readily over the landscape in the project vicinity, foraging over and within both natural lands and developed areas. Mammals of different

species move within their home ranges, but also disperse between patches of habitat. Generally, reptiles and amphibians similarly settle within home ranges, sometimes moving to central breeding areas, upland refugia, or hibernacula in a predictable manner, but also dispersing to new areas. Some species, especially among the birds and bats, are migratory, moving into or through the project vicinity during specific seasons. Aside from bats, there are no other mammal species in the vicinity of the site that are truly migratory. However, the young of many mammal species disperse from their natal home ranges, sometimes moving over relatively long distances in search of new areas in which to establish.

Movement corridors are segments of habitat that provide linkage for wildlife through the mosaic of suitable and unsuitable habitat types found within a landscape while also providing cover. On a broader level, corridors also function as paths along which wide-ranging animals can travel, populations can move in response to environmental changes and natural disasters, and genetic interchange can occur. In California, environmental corridors often consist of riparian areas along streams, rivers, or other natural features.

Due to the presence of development surrounding the project site and lack of well-vegetated corridors in the vicinity, there are currently no well-defined or important movement corridors for mammals, amphibians, or reptiles on or through the project site. Wildlife species may move through the area using cover and refugia as they find them available. However, most dispersal by wildlife species in the project vicinity likely occurs along higher-quality habitats, such as the Upper Penitencia Creek corridor located approximately 1.7 miles to the north and northwest, as well as along the less developed and more open areas of the foothills of the Diablo Range approximately 0.5 mile to the east.

Upper Penitencia Creek, which eventually drains to the open waters of the San Francisco Bay, and its associated riparian corridor adjacent to the site serves as a movement corridor for several common and special-status species of birds, fish, mammals, reptiles, and amphibians. In addition, a number of birds, mammals, reptiles, and amphibians utilize the riparian corridor of Coyote Creek for movement purposes, as it provides sufficient vegetative cover preferred by these species when navigating across the landscape. Specifically, migratory passerines, rabbits (*Sylvilagus* spp.), coyotes (*Canis latrans*), raccoons, Pacific treefrogs, and alligator lizards (*Elgaria* spp.), amongst other species, are expected to move along this corridor.

The Diablo Range is over 200 miles long, and the open areas of the foothills near the project site are important movement areas for common and special-status animals such as the black-tailed deer, American badger (*Taxidea taxus*), gray fox (*Urocyon cinereoargenteus*), bobcat (*Lynx rufus*), western toad (*Anaxyrus boreas*), and gopher snake. These species, amongst others, are expected to move along the foothills of the range where development is less dense and allows for movement.

While the project footprint is on the east side of San José, and is not isolated from these important dispersal and movement corridors by freeways, railroads, and commercial development, there are no high-quality, large tracts of natural habitat located to its west or north-west, so dispersing animals are not likely to use the project site as a dispersal corridor. In summary, the project footprint is not a particularly important area for movement

by non-flying wildlife, and it does not contain any high-quality corridors allowing dispersal of such animals through the City.

Section 4. Special-Status Species and Sensitive Habitats

CEQA requires assessment of the effects of a project on species that are protected by state, federal, or local governments as "threatened, rare, or endangered"; such species are typically described as "special-status species". For the purpose of the environmental review of the project, special-status species have been defined as described below.

For purposes of this analysis, "special-status" plants are considered plant species that meet one or more of the following criteria:

- Listed under the Federal Endangered Species Act as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under the California Endangered Species Act as threatened, endangered, rare, or a candidate species.
- Listed by the CNPS as CRPR 1A, 1B, 2, 3, or 4.

For purposes of this analysis, "special-status" animals are considered animal species that meet one or more of the following criteria:

- Listed under the Federal Endangered Species Act as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under the California Endangered Species Act as threatened, endangered, or a candidate threatened or endangered species.
- Designated by the CDFW as a California species of special concern.
- Listed in the California Fish and Game Code as fully protected species (fully protected birds are provided in Section 3511, mammals in Section 4700, reptiles and amphibians in Section 5050, and fish in Section 5515).

Information concerning threatened, endangered, and other special-status species that potentially occur on the project site was collected from several sources and reviewed by H. T. Harvey & Associates biologists as described in Section 2.1 above. Figure 4 depicts CNDDB records of special-status plant species in the general vicinity of the project site and Figure 5 depicts CNDDB records of special-status animal species. These generalized maps show areas where special-status species are known to occur or have occurred historically.

4.1 Special-Status Plant Species

The CNPS (2025) and CNDDB (2025) identified 70 special-status plant species as known or potentially occurring in at least one of the nine USGS 7.5-minute quadrangles containing or surrounding the project site.

Figure 4. CNDDB-Mapped Records of Special-Status Plants

Figure 5. CNDDB-Mapped Records of Special-Status Animals

Due to the current and recent historical land use involving frequent and continued disturbance of native vegetation, as well as the lack of specialized habitats (e.g., serpentine or alkaline soils, etc.) on the site, all of the special-status plant species considered were determined to be absent from the project area for at least one of the following reasons: (1) absence of suitable habitat types, (2) lack of specific microhabitat or edaphic requirements, (3) the elevation range of the species is outside of the range of the project site, and/or (4) the project site is outside the species' known geographic range and/or there are no nearby extant records.

Figure 4 shows the CNDDB-mapped records of special-status plants within a 5-mile radius of the project site. A total of 11 special-status species have been known to occur within a 5-mile radius of the project site, including: Santa Clara red ribbons (*Clarkia concinna* ssp. *automixa*), robust spineflower (*Chorizanthe robusta* var. *robusta*), Congdon's tarplant (*Centromadia parryi* var. *congdonii*), Contra Costa goldfields (*Lasthenia conjugens*), hairless popcorn flower (*Plagiobothrys glaber*), fragrant fritillary (*Fritillaria liliacea*), maple-leaved checkerbloom (*Sidalcea malachroides*), Hall's bushmallow (*Malacothamnus hallii*), saline clover (*Trifolium hydrophilum*), Santa Clara Valley dudleya (*Dudleya abramsii* ssp. *setchellii*), and chaparral harebell (*Ravenella exigua*) (CNDDB 2024).

Although a CNDDB record of Santa Clara red ribbons intersects the site, it is not expected to occur in the dense, frequently non-native dominated tree stands within the ornamental woodland or the wetlands, as all known extant records in the vicinity occur well upslope of this site. The project site is not within the appropriate elevation range for chaparral harebell orSanta Clara red ribbons, which are known to occur on the slopes within the foothills of the coast ranges. Along with the above species not being within the appropriate elevational range, no appropriate habitat and edaphic conditions exist to support these and other species that are within the site's elevation range. Suitable evergreen forest or coastal prairie habitats for maple-leaved checkerbloom are not present on site, and neither are the gravelly or sandy soils required by robust spineflower. Contra Costa goldfields, Congdon's tarplant, and saline clover are often found in alkaline wetlands or in some cases vernal pool wetland habitats which the seasonal wetlands and ornamental woodland does not meet the requirements for. Fragrant fritillary and Santa Clara Valley dudleya occur on serpentine soils, which do not occur on the project site. Hall's bushmallow can occur in woodland habitats, but is more associated with chaparral, which does not occur on the project site; additionally, no shrubs in the genus *Malacothamnus* (which are apparent and identifiable to genus year-round) were observed on the project site. Hairless popcorn flower is considered extirpated from the area by CNPS (CNPS 2025).

Thus, no special-status plant species are expected to be present on the project site.

4.2 Special-Status Animal Species

We identified several special-status animal species as potentially occurring in the project vicinity, and Figure 5 shows CNDDB-mapped records of special-status animals in the site vicinity. However, all of these species were determined to be absent from the project site. Species considered for occurrence but rejected, as well as the reasons for their rejection, are as follows:

- The California tiger salamander (*Ambystoma californiense*), federally and state listed as threatened and a VHP-covered species, occurred historically in the project vicinity. However, the small shallow (1 foot deep or less) freshwater wetland areas present on site do not provide suitable breeding habitat for this species due to its limited extent and shallow depth. California tiger salamanders have been extirpated from the urbanized Santa Clara Valley floor due to development, the alteration of hydrology of its aquatic habitats, and the introduction of nonnative predators such as non-native fishes and bullfrogs (H. T. Harvey & Associates 1997, Santa Clara Valley Water District 2011). The species is thus determined to be absent from the project site.

- The California red-legged frog (*Rana draytonii*), federally listed as threatened, a California species of special concern, and a VHP-covered species, also occurred historically in the project vicinity. The wetlands present on the project site are not deep enough for this species, which has been extirpated from the majority of the urbanized Santa Clara Valley floor due to development, the alteration of hydrology of its aquatic habitats, and the introduction of nonnative predators such as non-native fishes and bullfrogs (H. T. Harvey & Associates 1997, Santa Clara Valley Water District 2011). This species is thus determined to be absent from the project site.

- The foothill yellow-legged frog (*Rana boylii*) (Central Coast DPS), state listed as endangered and federally listed as threatened and a VHP-covered species, occurred historically in the project vicinity. The breeding ecology of the foothill yellow-legged frog requires consistently slow-moving stream flows, which are absent from the project site, and this species has been extirpated from Valley floor areas of Santa Clara County, (H. T. Harvey & Associates 1999). As a result, this species is determined to be absent from the project site.

- No northwestern pond turtles (*Actinemys marmorata*), federally proposed as threatened, a California species of special concern, and a VHP-covered species, were observed during the site visit. The water at this location is too shallow (i.e., 1 ft deep or less) and too limited in extent for use by pond turtles, which need deeper waters for cover and forage. The presence of impermeable fences and dense residential development surrounding the project site further reduces the likelihood that individual pond turtles would disperse from natural areas nearby to the site.

- No suitable nesting, roosting, or foraging habitat for burrowing owls (*Athene cunicularia*), a candidate for listing under CESA, is present on the site.

- No nests of the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), a California species of special concern, were observed on the project site. Suitable habitat for this species is present within the understory of the woodland habitat and vegetated margins of the wetland habitat on the project site, and suitable nesting material and forage such as Pacific poison oak (*Toxicodendron diversilobum*) is also present. However, given the lack of nests or other woodrat sign on the project site, and lack of connectivity to other suitable woodrat habitat areas such as creek corridors, we do not expect this species to occupy the site.

- The American badger (*Taxidea taxus*), a California species of special concern, is known to occur in the project region primarily in the extensive grasslands and agricultural habitats in the foothills of the Diablo Range to the east. However, no dens of badgers were observed on site during the December 2024 site visit,

nor are they expected to establish a den on the project site due to lack of habitat (i.e., open grasslands) and high levels of human activity. Although individual badgers may disperse into lowland/valley floor areas from the nearby foothills, given the lack of suitable habitat in the immediate vicinity and the isolated nature of the project site (i.e., surrounded by residential development), individual dispersants are not expected to move through the site. Therefore, we do not expect badgers to occur on or near the project site.

- An examination of both the trees and the buildings on the project site failed to detect any cavities or crevices large enough to provide high-quality habitat for a roosting or maternity colony of common or special-status bat species. Further, no sign of bats (e.g., guano or urine staining) was observed on buildings or trees on the project site. Special-status bats, including the pallid bat (*Antrozous pallidus*), are not known to occur in the site vicinity, and are determined to be absent from the site due to a lack of suitable roosting habitat. Individual bats may fly over the site or forage opportunistically on the site on occasion.

4.3 Sensitive and Regulated Habitats

Sensitive and regulated habitats are rare, ecologically valuable, and/or protected by federal, state, regional, and/or local laws. Generally, such habitats require permits from regulatory agencies if they are to be disturbed, altered, or lost. The CDFW ranks certain rare or threatened plant communities, such as wetlands, tracked in the CNDDB. The most commonly regulated habitats are wetland and aquatic habitats including rivers, streams, ponds, and seasonal wetlands, which fall under the jurisdiction of the U. S. Army Corps of Engineers (USACE) via Section 404 of the Clean Water Act, the Regional Water Quality Control Board (RWQCB) via Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act, and/or the CDFW via Section 1602 of the California Fish and Game Code.

CDFW Sensitive Natural Communities and Sensitive Vegetation Alliance and Associations. A query of sensitive natural communities in Rarefind (CNDDB 2025) identified three sensitive natural communities as occurring in the project vicinity: northern coastal salt marsh (Rank G3/S3.2), sycamore alluvial woodland (Rank G1/S1.1), and serpentine bunchgrass (Rank G2/S2.2). None of these sensitive natural communities occur on the project site.

The CDFW also maintains a list of vegetation alliances and associations within the state of California (CDFW 2024). This list includes global (G) and state (S) rarity ranks for associations and alliances. Alliances and associations currently ranked as S1-S3 are considered highly imperiled. The seasonal wetland and ornamental woodland on the site do not correspond to any sensitive vegetation alliances or associations as defined by CDFW.

Waters of the U.S./State. H. T. Harvey & Associates' reconnaissance-level survey of the project site and background review of available material indicates that the seasonal wetland that is located on the western portion of the project site would likely not be considered waters of the U.S. due to being isolated. However, this wetland would considered a jurisdictional waters of the state by the RWQCB since it is a wetland with three parameters (wetland hydrology, hydrophytic vegetation, and hydric soils) of a jurisdictional wetland.

CDFW Riparian Habitat. The wetland on-site may have originally formed as a backwater area or a historic channel of Babb Creek, however, no channel currently exists on site or connects to the seasonal wetland feature from upstream or downstream. Therefore, no riparian habitat regulated by CDFW under Section 1600 et seq. of the state Fish and Game Code occurs on the site.

In summary, the only sensitive or regulated habitat on the project site is the freshwater wetland located on the western portion of the site.

4.3.1 Nonnative and Invasive Species

Many nonnative, invasive plant species occur on the project site. Species with a "high" invasive rating by the Cal-IPC have the potential to cause severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment, and most are widely distributed ecologically (Cal-IPC 2025). On the project site, large stands of both English ivy and Himalayan blackberry, both species with a "high" rating, were observed.

Four species observed on the project site have a "moderate" rating by Cal-IPC, indicating that they have substantial and apparent-but generally not severe-ecological impacts on physical processes, plant and animal communities, and vegetation structure, and that their reproductive biology and other attributes are conducive to moderate to high rates of dispersal, though establishment would be generally dependent upon ecological disturbance (Cal-IPC 2025). The following species were found on the project site with a moderate rating: edible fig (*Ficus carica*), Mexican fan palm, bull thistle (*Cirsium vulgare*), and artichoke (*Cynara cardunculus*).

Five species observed on the project site have a "limited" invasive rating, indicating that they are invasive by their ecological impact are minor on a statewide level (Cal IPC 2024). The following species were found on the project site with a limited rating: smilo grass (*Stipa miliacea* var. *miliacea*), bur clover (*Medicago polymorpha*), curly dock (*Rumex crispus*), European olive (*Olea europaea*), and bristly ox-tongue (*Helminthotheca echioides*).

Section 5. CEQA Impacts

The State CEQA Guidelines provide direction for evaluating the impacts of projects on biological resources and determining which impacts will be significant. CEQA defines a "significant effect on the environment" as "a substantial adverse change in the physical conditions which exist in the area affected by the proposed project." Under State CEQA Guidelines Section 15065, a project's impacts on biological resources are deemed significant if the project would:

A. "substantially reduce the habitat of a fish or wildlife species"

B. "cause a fish or wildlife population to drop below self-sustaining levels"

C. "threaten to eliminate a plant or animal community"

D. "reduce the number or restrict the range of a rare or endangered plant or animal"

In addition to the Section 15065 criteria that trigger mandatory findings of significance, Appendix G of State CEQA Guidelines provides a checklist of other potential impacts to consider when analyzing the significance of project effects. The impacts listed in Appendix G may or may not be significant, depending on the level of the impact. For biological resources, these impacts include whether the project 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 Game 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, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service"

C. "have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, 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"

The proposed project will include construction of eight new residences across the entire 2.05 acre project site. Based on the plans provided, we are making the assumption that project impacts will encompass the entirety of the site (Figure 6), including 1.26 acres of ornamental woodland, 0.56 acres of urban/suburban, and 0.23 acres of freshwater wetland.

5.1 Santa Clara Valley Habitat Plan

The proposed project is classified as an "Urban Development" project, which is a "covered project" under the VHP (ICF International 2012). Urban Development projects include construction of residential densities greater than one dwelling unit per 2.5 acres. The Santa Clara Valley Habitat Agency (SCVHA) leads the implementation of the VHP, which is a regional partnership between the CDFW, the USFWS, and six local partners, including Valley Water, the County of Santa Clara, the Santa Clara Valley Transportation Authority, and the Cities of San José, Gilroy, and Morgan Hill. The VHP was adopted in 2013 by all local participating agencies, and permits were issued from the USFWS and CDFW. The VHP is both a habitat conservation plan and natural community conservation plan, or HCP/NCCP. The planning document helps private and public entities plan and conduct projects and activities in ways that lessen impacts on natural resources, including specific threatened and endangered species. The VHP identifies regional lands (called reserves) to be preserved or restored to the benefit of at-risk species, and describes how reserves will be managed and monitored to ensure that they benefit those species. In providing a long-term, coordinated planning for habitat restoration and conservation, the VHP aims to enhance the viability of threatened and endangered species throughout the Santa Clara Valley.

As an NCCP, the VHP fulfills the requirements of the California Natural Community Conservation Planning Act, which requires both contribution to the recovery of listed species and the preservation of natural communities at the ecosystem scale (ICF 2012). As such, the VHP goes above and beyond addressing project-specific impacts and mitigation by providing a higher level of in-perpetuity conservation of plant and animal species and their habitats at an ecosystem level. The VHP's reserve system provides comprehensive ecosystem conservation for a wide range of natural resources, and benefits numerous Santa Clara County plant and animal species and their habitats. Thus, although permits issued under the VHP name specific species (i.e., "covered species"), which are either listed as threatened or endangered or may be listed in the future during the permit term, the VHP contributes to the conservation of entire communities of common and rare plant and wildlife species and their habitats in Santa Clara County.

The VHP defines measures to avoid, minimize, and mitigate Impacts on covered species and their habitats while allowing for the implementation of certain *covered projects*. Chapter 6 of the VHP includes detailed and comprehensive conditions to avoid and minimize impacts on the 18 "covered species" (nine animal species and nine plant species) included in the plan area, which consists of 519,506 acres, or approximately 62% of Santa Clara County. These conditions are designed to achieve the following objectives:

Figure 6. Project Impacts

- provide avoidance of certain covered species during implementation of covered activities throughout the project site;
- prevent take of individuals of certain covered species from covered activities as prohibited by law (e.g., take of fully protected species);
- minimize impacts on natural communities and covered species where conservation actions will take place; and
- avoid and minimize impacts on jurisdictional wetlands and waters throughout the study area to facilitate project-by-project wetland permitting.

In conformance with the VHP, project proponents are required to pay impact fees in accordance with the types and acreage of habitat or "land cover" impacted, and to implement conservation measures specified by the VHP. Land cover impacts are used because it is the best predictor of potential species habitat, and is applicable to all of the covered species (with the exception of the burrowing owl). The SCVHA has mapped the following fee zones in the VHP area: (1) ranchland and natural lands, (2), agricultural and valley floor lands, and (3) small vacant sites. The following areas are exempt from land cover fees:

- all development that occurs on land mapped by the VHP as urban-suburban, landfill, reservoir (excluding dams), or agriculture developed land cover types;
- urban development in Fee Zones A–C on parcels less than 0.5 acre;
- additions to structures within 50 feet of an existing structure that result in less than 5,000 feet of impervious surface so long as there is no effect on wetland or serpentine land cover types; and
- construction of recreational facilities within the reserve system.

Additional fees in-lieu of providing compensatory mitigation are imposed for projects that impact serpentine habitat, wetlands, and burrowing owls, and for certain projects that result in atmospheric nitrogen emissions, although in some cases, project proponents may provide land to restore or create habitats protected by the VHP in lieu of payment of fees.

The project is located within the VHP Urban Service Area for San José. In regards to the VHP's land cover fee zones, the project impact areas (acres) fall within Fee Zone C (Small Vacant Sites Under 10 acres). For private developments under 10 acres within the VHP's urban service area, VHP fees are calculated based on the entire area of the subject property where the development project occurs. The project site does not include lands mapped as occupied burrowing owl nesting habitat, and no burrowing owl fee applies. Because the project would increase vehicular traffic to and from the area, it would also be required to pay fees for nitrogen emissions based on the number of new vehicle trips created by the project.

The impact assessment in Section 6.2 below summarizes the types of applicable fees and conservation measures that are required by the VHP. VHP conditions that apply to the proposed project are as follows:

Condition 1. Avoid Direct Impacts on Legally Protected Plant and Wildlife Species

In addition to FESA/CESA-protected species that are covered by the VHP, several wildlife species that occur in the project vicinity are protected under state and federal laws. The Crotch's bumble bee (*Bombus crotchii*) and mountain lion (*Puma concolor*) are candidates for listing under CESA and are proposed for addition as a covered species via the VHP amendment currently in progress. The white-tailed kite (*Elanus leucurus*) is designated as fully protected under the California Fish and Game Code. All other potentially occurring native bird species and their nests – with the exception of the California quail (*Callipepla californica*), which is in a family explicitly excluded from MBTA protection – are protected under the MBTA, and all native bird species occurring on the site are protected by the California Fish and Game Code. Actions conducted under the VHP must comply with the provisions of the MBTA and California Fish and Game Code.

Condition 3. Maintain Hydrologic Conditions and Protect Water Quality

Condition 3 applies to all projects and identifies a set of programmatic BMPs, performance standards, and control measures to minimize increases of peak discharge of storm water and to reduce runoff of pollutants to protect water quality, including during project construction. These requirements include preconstruction, construction site, and post-construction actions. Preconstruction conditions are site design planning approaches that protect water quality by preventing and reducing the impacts of stormwater pollutants and increases in peak runoff rate and volume. They include hydrologic source control measures that focus on the protection of natural resources. Construction site conditions include source and treatment control measure to prevent pollutants from leaving the construction site and minimizing site erosion and local stream sedimentation during construction. Post-construction conditions include measures for stormwater treatment and flow control.

Condition 12. Wetland and Pond Avoidance and Minimization

Condition 12 applies to covered projects that may affect ponds or wetlands within the VHP plan area. This condition requires that projects be designed to avoid and minimize impacts to wetlands to the extent practicable, and to follow the setbacks for streams defined in Condition 11 and the guidelines and requirements to protect water quality in Condition 3. Condition 12 also defines design-phase and construction-phase actions to avoid and minimize impacts on wetlands and ponds, such as stormwater filtration features, planting of native vegetation to shield lines of sight between the development and the wetland or pond, fencing, erosion control measures, and measures to prevent the spread of wildlife diseases and invasive species.

For the sake of the impact assessment, we assumed that the entire project site would be impacted by the project. Following is an assessment of potential project impacts on biological resources. The impact assessment below is structured based on the six significance criteria (A–F) listed above.

5.2 Impacts on Special-Status Species: 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 CDFW or USFWS (Less than Significant)

5.2.1 Impacts on Ornamental Woodland and Urban-Suburban Land Cover Types and Associated Common Plant and Wildlife Species (Less than Significant)

Proposed project activities would permanently impact 1.26 acres of ornamental woodland and up to 0.56 acre of urban-suburban habitat within the project footprint. These impacts would reduce the extent of vegetation within the impact area and would result in a reduction in abundance of some of the common plant and wildlife species that occur on the site. However, the area of ornamental woodland and urban-suburban land cover to be impacted occurs in a location in San José that has been subject to disturbance and fragmentation in the past and is embedded within a highly developed urban area, such that these areas do not provide regionally rare or especially high-value habitat for native vegetation or wildlife, or special-status species. In addition, ornamental woodland and urban-suburban land cover types are abundant and widespread regionally and are not particularly sensitive, and the habitat within the project footprint is not especially valuable (from the perspective of providing important plant or wildlife habitat) or an exemplary occurrence of this habitat type. Therefore, impacts on these habitats are considered less than significant. Further, because the number of individuals of any common plant or animal species within these habitats, and the proportion of these species' regional populations that could be disturbed, is very small, the project's impacts would not substantially reduce regional populations of these species. Thus, these impacts do not meet the CEQA standard of having a *substantial* adverse effect, and would not be considered significant under CEQA.

5.3 Impacts on Sensitive Communities: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS (No Impact)

5.3.1 Impacts on Riparian Habitat, or Other Sensitive Natural Communities (No Impact)

The CDFW defines sensitive natural communities and vegetation alliances using NatureServe's standard heritage program methodology (CDFW 2025), as described above in Section 4.3. Aquatic, wetland and riparian habitats are protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the U.S. Fish and Wildlife Service. Project impacts on sensitive natural communities, vegetation alliances/associations, or any such community identified in local or regional plans, policies, and regulations, were considered and evaluated.

Aside from seasonal wetlands, which are addressed in Section 5.4, no riparian habitat or other sensitive natural communities are located on or adjacent to the project site, and thus, there will be no impacts to riparian habitat or other sensitive natural communities as a result of the project.

5.4 Impacts on Wetlands: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Less than Significant)

A seasonal wetland is located in the northwestern portion of the project site. This wetland would be considered jurisdictional waters of the state by RWQCB. Based on plans illustrated in Figure 6, the entirety of the seasonal wetland will be permanently impacted from project development. Because all wetlands would be filled and permanently impacted, and the wetlands are isolated from other wetland or stream features in the area, there would be no temporary impacts to the wetlands or indirect impacts to avoided or non-project wetlands from the project. Because this is a VHP-covered project, specialty wetland fees will be required. These fees will be used by the Santa Clara Valley Habitat Agency for restoration and wetland creation efforts within the Plan area, and therefore these impacts are considered less than significant and require no additional mitigation.

5.5 Impacts on Wildlife Movement: 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 (No Impact)

For many species, the landscape is a mosaic of suitable and unsuitable habitat types. Environmental corridors are segments of land that provide a link between these different habitats while also providing cover. Development that fragments natural habitats (i.e., breaks them into smaller, disjunct pieces) can have a twofold impact on wildlife: first, as habitat patches become smaller they are unable to support as many individuals (patch size); and second, the area between habitat patches may be unsuitable for wildlife species to traverse (connectivity).

As discussed in Section 3.3 *Wildlife Movement*, the project site is situated amongst a dense matrix of residential development, and there are currently no well-defined or important movement corridors for non-flying wildlife on or through the project site. Flying wildlife species (i.e. birds and bats) may move through the site using residential landscaping as cover, and they will continue to be able to move through following construction. Further, the wetlands on the site do not provide an important movement pathway for aquatic or terrestrial wildlife species, as it does not appear connected to any other aquatic habitat or any riparian corridor. As a result, the proposed redevelopment of the project site would not result in the fragmentation of natural habitats. Wildlife species that occur in nearby natural and urbanized areas may move through the site, and they will continue to be able to move through following construction of the new residences on the property, either by passing north and south of the new structures on the property or north and south of all development on the property (i.e., through other yards of adjacent residential parcels). Thus, any wildlife species that currently move through the project site would continue to be able to do so following project construction, and the project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors in the site vicinity.

5.6 Impacts due to Conflicts with Local Policies: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Less than Significant)

5.6.1 Impacts Due to the Removal of Protected Trees (Less than Significant)

According to the City of San José Municipal Code, no person is allowed to unlawfully prune or remove any tree that qualifies as a "protected tree" (City of San José, CA Code of Ordinances, Chapter 13.28). The City considers a protected tree of significant size to be:

- All single trunk trees which have a 12-inch or greater diameter at 4 ½ feet above ground on private property.
- All multi-trunk trees with have a greater combined measurements of 12 inch of greater diameter at 4 ½ feet above the ground on private property.

In addition, any tree which, because of factors including but not limited to its history, girth, height, species, or unique quality, has been found by the City Council to have special significance to the community may be designated as a heritage tree (San José, CA Code of Ordinances, Chapter 13.28).

Many of the trees on the project site are greater than 12-inches in diameter and would therefore be considered protected trees by the City of San José. The project will impact some of these protected trees and will thus obtain a Tree Removal Permit from the City of San José. The applicant will comply with all conditions of the Tree Removal Permit, and therefore, impacts associated with conflicts with the City's tree ordinance will be less than significant.

5.7 Impact due to Conflicts with an Adopted Habitat Conservation Plan: Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan (No Impact)

The City of San José is a signatory to the VHP, which is a Habitat Conservation Plan and Natural Community Conservation Plan. As described in Section 5.1, the project is considered a "covered project" under the VHP. No VHP-covered species that may be affected by the proposed project are were found to have potential to occur on the proposed project site. Therefore, the proposed project would not be in conflict with the VHP.

The proposed project would not be in conflict with any other adopted habitat conservation plans or natural community conservation plans, or with any other approved local, regional, or state habitat conservation plans or natural community conservation plans. Thus, impacts associated with conflicts between the proposed project and any adopted habitat conservation plan or natural community conservation plan are less than significant.

Construction disturbance and project tree removal during the avian breeding season (February 1 through August 31 inclusive, for most species) could result in the incidental loss of eggs or nestlings, either directly

through the destruction or disturbance of active nests or indirectly by causing the abandonment of nests. Because such an impact would conflict with Condition 1 of the VHP, it would be considered a significant impact under CEQA. Mitigation Measures BIO-1 and 2 would be implemented to reduce impacts due to conflicts with Condition 1 of the VHP to a less-than-significant level.

Mitigation Measure BIO-1. Nesting-Season Avoidance. To the extent feasible, construction activities should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in Santa Clara County extends from February 1 through August 31, inclusive.

Mitigation Measure BIO-2. Preconstruction/Pre-disturbance Surveys and Buffers. If it is not possible to schedule construction activities and/or tree removal between September 1 and January 31, preconstruction surveys for nesting birds shall be conducted by a qualified ornithologist to ensure that no nests shall be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of demolition or construction activities, including tree removal and pruning. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, ruderal grasslands, buildings) in and immediately adjacent to the impact areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist shall determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code shall be disturbed during project implementation.

5.8 Cumulative Impacts (Less than Significant)

Cumulative impacts arise due to the linking of impacts from past, current, and reasonably foreseeable future projects in the region. Future development activities in the City of San José and development activities covered by the VHP will result in impacts on the same habitat types and species that will be affected by the proposed project. The proposed project, in combination with other projects in the area and other activities that impact the species that are affected under the project, could contribute to cumulative effects on special-status species. Other projects in the area include both development and maintenance projects that could adversely affect these species and restoration projects that will benefit these species.

The cumulative impact on biological resources resulting from the project in combination with other projects in the region would be dependent on the relative magnitude of adverse effects of these projects on biological resources compared to the relative benefit of impact avoidance and minimization efforts prescribed by planning documents, CEQA mitigation measures, and permit requirements for each project; compensatory mitigation and proactive conservation measures associated with each project, and the benefits to biological resources accruing from the VHP. In the absence of such avoidance, minimization, compensatory mitigation, and conservation measures, cumulatively significant impacts on biological resources would occur.

However, the San José General Plan contains conservation measures that would benefit biological resources, as well as measures to avoid, minimize, and mitigate impacts on these resources and the VHP includes numerous conservation measures to offset adverse effects on covered activities. Many projects in the region that impact resources similar to those impacted by the proposed project will be covered activities under the VHP and will mitigate impacts on sensitive habitats and many special-status species through that program, which will require payment of fees for habitat restoration. Further, the project would implement a number of avoidance, minimization, and compensatory mitigation measures to reduce impacts on both common and special-status species, as described above. Thus, the project will not have a cumulatively considerable contribution to cumulative impacts on biological resources.

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Appendix A. Plant Species Observed

Scientific Name	Common Name	Cal-IPC Rank[1]
EUDICOTS		
ANACARDIACEAE – SUMAC FAMILY		
Toxicodendron diversilobum	poison oak	
APIACEAE – CARROT FAMILY		
*Apium graveolens**	celery	
APOCYNACEAE – DOGBANE FAMILY		
*Nerium oleander**	common oleander	
ARALIACEAE – GINSENG FAMILY		
*Hedera helix**	English ivy	High
ASTERACEAE – SUNFLOWER FAMILY		
*Cirsium vulgare**	bull thistle	Moderate
*Cynara cardunculus**	artichoke	Moderate
*Helminthotheca echioides**	bristly ox-tongue	Limited
BRASSICACEAE – MUSTARD FAMILY		
Nasturtium officinale	water cress	
CUCURBITACEAE – GOURD FAMILY		
Cucurbita sp.	gourd	
FABACEAE – LEGUME FAMILY		
*Medicago polymorpha**	variable burclover	Limited
FAGACEAE – OAK FAMILY		
Quercus lobata	valley oak	
MORACEAE – MULBERRY FAMILY		
*Ficus carica**	edible fig	Moderate
MYRTACEAE – MYRTLE FAMILY		
*Eucalyptus sideroxylon**	red iron bark	
OLEACEAE – OLIVE FAMILY		
*Olea europaea**	European olive	Limited
POLYGONACEAE – BUCKWHEAT FAMILY		
*Polygonum aviculare**	knotweed	
*Rumex crispus**	curly dock	Limited
ROSACEAE – ROSE FAMILY		
*Rubus armeniacus**	Himalayan blackberry	High
RUBIACEAE – COFFEE FAMILY		
Galium aparine	goose grass	
SALICACEAE – WILLOW FAMILY		
Salix laevigata	red willow	
SOLANACEAE – NIGHTSHADE FAMILY		
*Solanum nigrum**	black nightshade	
MONOCOTS		
ARACEAE – ARUM FAMILY		
Lemna sp.	duckplant	
ARECACEAE – PALM FAMILY		
*Washingtonia robusta**	Mexican fan palm	Moderate
ASPHODELACEAE – ASPHODEL FAMILY		
*Aloe ×schoenlandii**	Schoenland's aloe	
CYPERACEAE – SEDGE FAMILY		
Cyperus eragrostis	lovegrass flatsedge	
POACEAE – GRASS FAMILY		

Scientific Name	Common Name	Cal-IPC Rank[1]
*Avena sp.**	oat	
Bromus sp.	brome	
*Cenchrus sp.**	sandbur	
*Stipa miliacea var. miliacea**	smilo grass	Limited
TYPHACEAE – CATTAIL FAMILY		
*Typha angustifolia**	narrow-leaved cattail	

*Nonnative or invasive species

[1]Cal-IPC Ranks (Cal-IPC 2024):

- Watch List – These species are predicted to become invasive if no further actions are taken. Distribution may range from limited to widespread in specific regions.
- Limited – These species are invasive, but their ecological impacts are minor on a statewide level. They have low to moderate rates of colonization. Although their distribution is generally limited, these species may be locally persistent and problematic.
- Moderate – These species have substantial and apparent—but generally not severe—ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal. Distribution may range from limited to widespread.
- High – These species have severe ecological impacts on the surrounding habitat. They have moderate to high rates of dispersal and establishment, and most are widely distributed.