MEMORANDUM

TO:	Mark Younger	**FROM:**	Amy Parravano, Senior Biologist
CC:	Kerry Burke		
DATE:	February 22, 2023		
SUBJECT:	Biological Resource Impact Avoidance Recommendations for Proposed Well Drilling Project, San Mateo County		

Background

On February 8 and April 26, 2022, WRA, Inc. (WRA) conducted a suite of biological studies on a property located on APNs 086-250-140, 086-250-150 and 086-250-160 in the unincorporated community of Pescadero, San Mateo County, California (Attachment 1; "Study Area"). A biological resources assessment was initially conducted to map vegetation communities and evaluate habitat suitability for special-status plant and wildlife species. Subsequently, wetland delineation and focused special-status plant surveys were conducted. Results of these studies were synthesized into the following technical reports:

- Biological Resources Technical Report - Younger Property, Pescadero, San Mateo County, CA (WRA, July 2022)
- Delineation of Potential Jurisdictional Waters of The U.S. And Waters of The State of California Report -Younger Property, Pescadero, San Mateo County, CA (WRA, July 2022)
- Rare Plant Survey Report - Younger Property, Pescadero, San Mateo County, CA (WRA, July 2022)

While no formal project has been proposed at this time, these reports were submitted to San Mateo County with an application for a Coastal Development Permit for domestic well construction to determine if the property contains sufficient water to supply a single-family residence. For the purposes of this memorandum, WRA has reviewed the site plan and taken into consideration any areas that may meet the definition of an Environmentally Sensitive Habitat Area (ESHA) defined the San Mateo County LCP (San Mateo County 2013). The LCP identifies ESHAs to include, but is not limited to, "riparian corridors, wetlands, marine habitats, sand dunes, sea cliffs, and habitats supporting rare, endangered, and unique species."

Methods and Results

Wetland Delineation (including ESHAs)

The wetland delineation followed the Routine Method to evaluate the Study Area for the presence or absence of indicators of the three wetland parameters described in the Corps Manual (Environmental Laboratory 1987) and Arid West Supplement (Corps 2008). In addition, this delineation determined the location and extent of features potentially meeting the definition of a California Coastal Commission (CCC) jurisdictional wetlands and ESHAs pursuant to the

California Coastal Act (Coastal Act) and San Mateo County Local Coastal Program (LCP). Three wetlands and/or ESHAs were mapped likely subject to CCC/LCP jurisdiction:

- Scrub-shrub wetland (0.62 acre)
- Seasonal wetland (0.29 acre)
- Sea cliffs (0.47 acre)

A 100-foot minimum buffer zone is typically required surrounding wetlands by the County LCP code. This setback may be reduced to no less than 50 feet only where: (1) no alternative development site or design is possible; and (2) adequacy of the alternative setback to protect wetland resources is conclusively demonstrated by a professional biologist to the satisfaction of the County.

Rare Plant Survey

A protocol-level special-status plant species survey was conducted in accordance with resource agency guidelines (CDFW 2018, CNPS 2001, and USFWS 1996). Two special-status species were identified and mapped during the survey:

- Harlequin lotus (*Hosackia gracilis*, CRPR 4.2)
- Choris' popcornflower (*Plagiobothrys chorisianus* var. *chorisianus*, CRPR 1B).

The LCP's development standards discourage development within 50 feet of any special-status plant population. However, LCP Policy 7.42 (Development Standards) states that when no feasible alternative exists, the County will allow development if: (1) the site or a significant portion thereof is returned to a natural state to allow for the reestablishment of the plant, or (2) a new site is made available for the plant to inhabit.

Biological Resources Assessment (Wildlife Habitat)

The biological resources assessment concluded that the Study Area provides suitable habitat for nesting birds, including one special-status species, San Francisco (saltmarsh) common yellowthroat, as well as other non-status species that are protected while nesting. The Study Area is outside of USFWS-designated critical habitat for San Francisco garter snake (*Thamnophis sirtalis tetrataenia*; federal Endangered, State Endangered, CDFW Fully Protected Species) and California red-legged frog (*Rana draytonii*; federal Threatened, CDFW Species of Special Concern). There are documented occurrences of CRLF within Spring Breach Gulch east of Highway 1. However, the Study Area does not contain suitable habitat for CRLF or SFGS. There is no aquatic habitat (e.g., ponds) or upland refugia habitat adjacent to aquatic habitat. The Study Area contains sparse, low-growing vegetation and does not provide burrows or cracks that could provide refugia for these species.

Impact Avoidance and Minimization Measures

Wetlands, ESHAs, and Rare Plants

WRA coordinated with Sigma Prime Geosciences, Inc. engineers to identify locations of proposed well sites and a temporary equipment access route that avoid impacts to wetlands/ESHAs and rare plants. This was accomplished by overlaying the site plans onto wetlands/ESHAs plus a surrounding 100-foot buffer, and rare plants plus a surrounding 50-foot buffer (refer to Attachment 2). Well sites, surrounding work areas, and the temporary access route were sited

outside of the resource protection buffers. Therefore, the proposed well drilling work will avoid impacts to wetlands/ESHAs and rare plants in accordance with LCP requirements.

Special-Status Wildlife Species and Other Nesting Bird Species

WRA recommends implementation of the following avoidance and minimization measure (AMM) to avoid impacts to San Francisco (saltmarsh) common yellowthroat and other nesting birds.

AMM BIO-1: Nesting Bird Avoidance

- Conduct well construction work outside of the nesting season (August 1-February 28).
- If construction work is conducted during the nesting bird season (March 1 through July 31). a qualified biologist will a conduct pre-construction nesting bird survey. If active nests containing eggs, chicks or young are discovered during the pre-construction survey, a qualified biologist would establish a species-specific no-work buffer around the active nest. Project activities may be postponed until the conclusion of the nesting season, or the biologist may perform follow-up checks to determine whether the nest is still active.

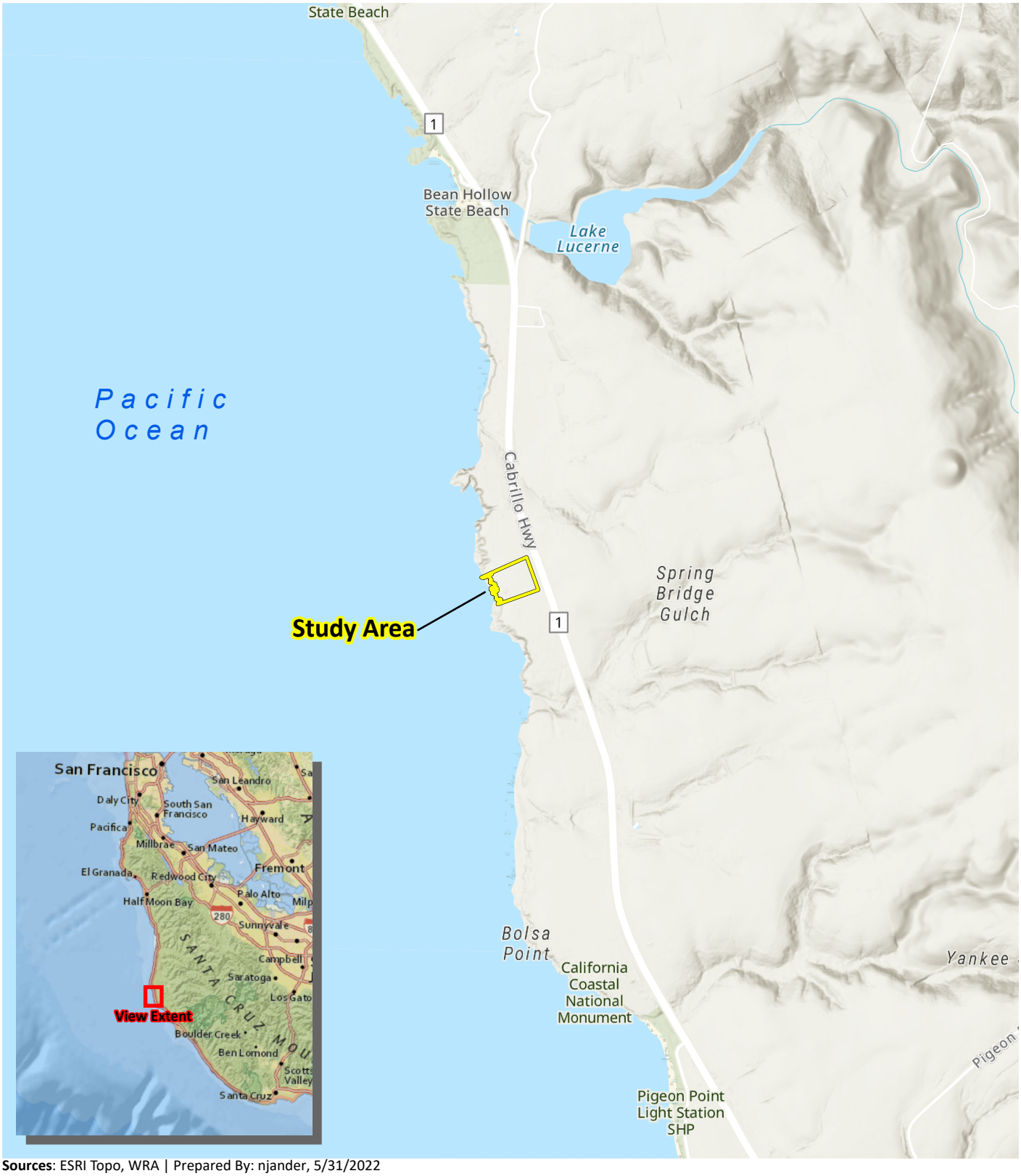
California Red-legged Frog and San Francisco Garter Snake

No suitable breeding or upland habitat is present within the Study Area for CRLF or SFGS. However, in the unlikely event that these species disperse through the Study Area, implementation of the following AMM is recommended.

AMM BIO-2: California Red-legged Frog and San Francisco Garter Snake Avoidance

- All ground disturbance activities will be restricted to the dry season (April 15 through October 15) when all habitats have dried to reduce potential for CRLF and SFGS to disperse through the Study Area.
- A qualified biologist will survey the work site immediately before the onset of ground disturbing activities to determine if species are present and verify that all habitats are dry. Any SFGS shall be allowed to leave the work area on their own and shall be monitored by the biologist to ensure they do not reenter the work area. If CRLF are found and do not move out of the work area on their own, USFWS shall be contacted to determine if relocation is appropriate. In making this determination, the USFWS will consider if an appropriate relocation site exists. If the USFWS approves moving animals, a USFWS-approved biologist will be allowed sufficient time to move the species from the work site before work activities begin.
- No work shall occur within 48 hours of a rain event (over 0.25 inch in a 24-hour period). Following a rain event, a qualified biologist shall survey the work site immediately before reinitiating ground disturbance activities to verify if species are present. If CRLF or SFGS are observed, then the steps previously described for the initial pre-construction survey will be followed.

With adherence to the proposed work area and access route depicted on Attachment 2 and implementation of Measures AMMs BIO-1 and BIO-2 proposed well construction will be conducted in compliance with LCP requirements and no additional mitigation measures are recommended.



Path: L:\Acad 2000 Files\320000\320050\GIS\ArcMap\320050Base.aprx

Sources: ESRI Topo, WRA | Prepared By: njander, 5/31/2022

Attachment 1. Study Area Regional Location Map

Younger Property Assessment
(APNs 086-250-140, 086-250-150, and 086-250-160)

0 0.25 0.5 Miles

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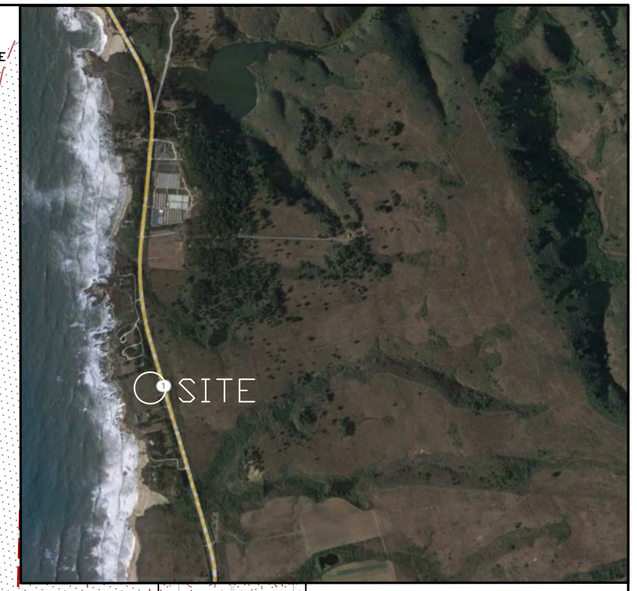
wra
ENVIRONMENTAL CONSULTANTS

Attachment 2. Site Plan and ESHAs



LOCATION MAP (Not to Scale)

LANDS OF MAPACHE GROUP LLC

LANDS OF SKOLNICK
6259 OR 640*
APN 086-250-140
90,165± SQ.FT.
2.07± ACRES

LANDS OF SKOLNICK
DOC. 2015-022805*
APN 086-250-150
103,364 SQ.FT.
2.37± ACRES

LANDS OF SKOLNICK
DOC. 2015-046770*
APN 086-250-160
91,164± SQ.FT.
2.09± ACRES

LANDS OF STEMBEL

CABRILLO HIGHWAY (WIDTH VARIES)

ROCKY CLIFF
ROCK
SAND
HEAVILY WOODED INACCESSIBLE AREA, CONTOURS SHOWN AS APPROXIMATE IN THIS AREA
4' WOOD FENCE
APPROXIMATE HIGH TIDE LINE
PROPOSED DOMESTIC WELL 'A'
PROPOSED DOMESTIC WELL 'B'
PROPOSED DOMESTIC WELL 'C'
EXISTING WELL
ACCESS ROUTE
10' WATERLINE EASEMENT (5132 OR 435)
BUSH
HIGH COYOTE BRUSH AND POISON OAK IN AREA, CONTOURS SHOWN AS APPROXIMATE IN THIS AREA
FOUND 3/4" IRON PIPE OPEN
POST
ASPHALT BERM
ENTRANCE
PAINT STRIPE, TYP
EDGE OF PAVEMENT
PAVEMENT

N65°14'51"E 715.00' ± TO HIGH TIDE
N67°47'51"E 581.83'± TO HIGH TIDE LINE
S69°19'15"W 607.92' ± TO HIGH TIDE LINE
N70°44'51"E 620.00'± TO HIGH TIDE LINE

1 INCH = 60 FEET

GENERAL NOTES

1. PLANS PREPARED AT THE REQUEST OF: MARK YOUNGER, PROPERTY OWNER.
2. SURVEY BY LEA AND BRAZE MARCH, 2022
   ELEVATION DATUM: NAVD88

RARE PLANT SPECIES AND WETLAND AREAS TO AVOID (As Defined in WRA's Biological Report)

Chorls Popcorn Flower | Harlequin Lotus | Wetland | 100 Foot Buffer From Wetland

Sigma Prime Geosciences, Inc.

Figure	1
Date:	2/22/23
Job No.:	22-183

Proposed Domestic Well Site Map
CABRILLO HIGHWAY PESCADERO, CALIFORNIA
APNS: 086-250-140, -150, -160