Addendum

Samoa Town Master Plan Biological Resource Study

Botanical Survey And Invasive Plant Management Plan

September 9, 2013

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Community Development Services Department
And
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Executive Summary

The following addendum to the Samoa Town Master Plan (STMP) Biological Resource Study was prepared to satisfy conditions for approval of the STMP Land Use Overlay Designation of the Humboldt Bay Area Plan. The project applicants incorporated California Coastal Commission (CCC) recommendations into the STMP to fulfill Policy 10 of the Local Coastal Program Amendment. These recommendations include the re-designation of certain degraded habitats within the plan area as Environmentally Sensitive Habitat Areas (ESHA), the establishment of appropriate development setbacks from these habitats, and an updated botanical survey and invasive plant management plan for the project area. The setbacks shown on the tentative map were established based on the CCC review of the site in 2010 and are still appropriate based on the 2013 botanical survey.

Several areas of "degraded dunes" located east of New Navy Base were reclassified as ESHA due to the presence of natural dune processes and the rarity and ease with which they could be further degraded by human activity. The first is the long strip of fenced dunes located within the utility easement between the abandoned log deck and New Navy Base Road. The second area is a continuation of the first, situated between New Navy Base Road, the residential housing, and the coastal coniferous forest at the north end of the plan area. Three other small areas of degraded dunes with similar characteristics, one adjacent to New Navy Base Road, one above the Peninsula Elementary School, and an irregular patch north of Vance Avenue were also reclassified as ESHA. In addition, three small areas of remnant native vegetation previously designated as ESHA were also removed from that designation due to their relative isolation, per CCC recommendation. All upland vegetation communities designated as ESHA are afforded 100-foot development setbacks, except where truncated by existing development.

That portion of the "waste-water treatment facility" previously designated as non-ESHA was reclassified as a natural dune swale feature and state/federal regulatory wetland. This feature and all other wetlands located west of the railroad easement have been designated as ESHA and provided 100-foot development setbacks.

Botanical surveys were undertaken in 2013 within that portion of the plan area subject to redevelopment. No new rare plant occurrences were discovered. Previously documented occurrences of two Special-status plants, beach layia (*Layia carnosa*) and dark-eyed gilia (*Gilia millefoliata*), were relocated within the utility line easement between New Navy Base Road and the former log deck, and within an open sand area next to the forest/scrub habitat at the north end of the plan area. They were found generally in the same locations as they were in 2003/2004 but occupying slightly larger representative areas. Both the beach layia and the dark-eyed gilia occur within areas that have been designated as environmentally sensitive and afforded a 100-foot setback from proposed development. No impacts to these occurrences are anticipated from site development.

Invasive plants targeted for removal within the project area were identified and mapped in 2013. These include certain highly invasive species recognized by the California Invasive Plant Council and/or known to be locally invasive, namely Himalayan blackberry (*Rubus armeniacus*), Ivy (*Hedera helix*), Scotch broom (*Cytisus scoparius*), jubata grass

(*Cortaderia jubata*), iceplant/sea fig (*Carpobrotus* ssp), European beachgrass (*Ammophila arenaria*), and yellow bush lupine (*Lupinus arboreus*).

Key components of the invasive plant management plan include:

- Phased removal of the highly invasive plant species identified within the plan area where development is proposed and within ESHA buffers.
- Provision for the immediate re-vegetation of cleared lands following site development.
- Provision for the use of regional, native plant species for the re-vegetation of ESHA buffers, and use of native or non-native but *non-invasive* plants for re-vegetation of urban and residential areas.
- Five year monitoring program to document the results of eradication efforts and to identify remediation measures.

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1.0 Introduction

The Samoa Town Master Plan (STMP) Land Use Overlay Designation of the Humboldt Bay Area Plan (HBAP) was approved by the County of Humboldt on December 6, 2011. The HBAP amendment incorporates the adopted findings of the California Coastal Commission (LCP Amendment HUM-MAJ-01-08, February 24, 2011) detailing the conditions for approval. Those conditions involve updating biological resource information within that portion of the plan area subject to redevelopment by providing a current botanical survey, an evaluation of the historic landscape context of the plan area, and preparing a phased management plan for the removal or control of certain ecologically significant invasive exotic plant species.

Consulting biologist, Stephanie Morrissette, conducted seasonally appropriate rare plant surveys and invasive plant surveys during the spring and summer of 2013 to fulfill requirements of the HBAP. The results of those studies, and rationale for the incorporation of Coastal Commission findings that pertain to land use designations, habitat classifications, and resource protection are included in the following addendum to the Samoa Master Plan Biological Resource Study (Mad River Biologists 2004).

The study area includes all development phases of the STMP located east of New Navy Base Road and west of the NW Pacific Railroad right-of-way along North Bay View Street, as well as that portion of the plan area immediately adjacent to the Samoa Cookhouse (east of the railroad), as shown in Figure 1.

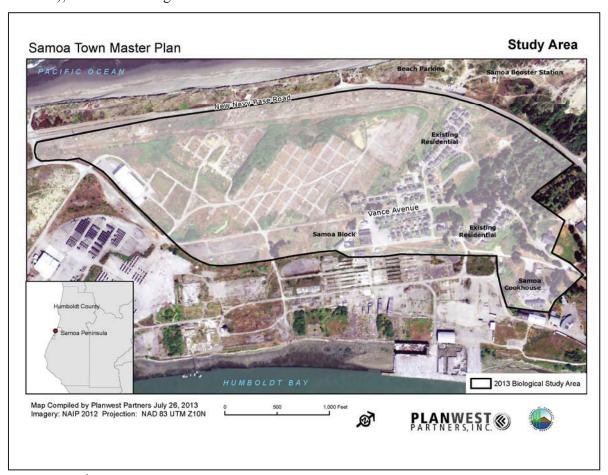


Figure 1 Study Area

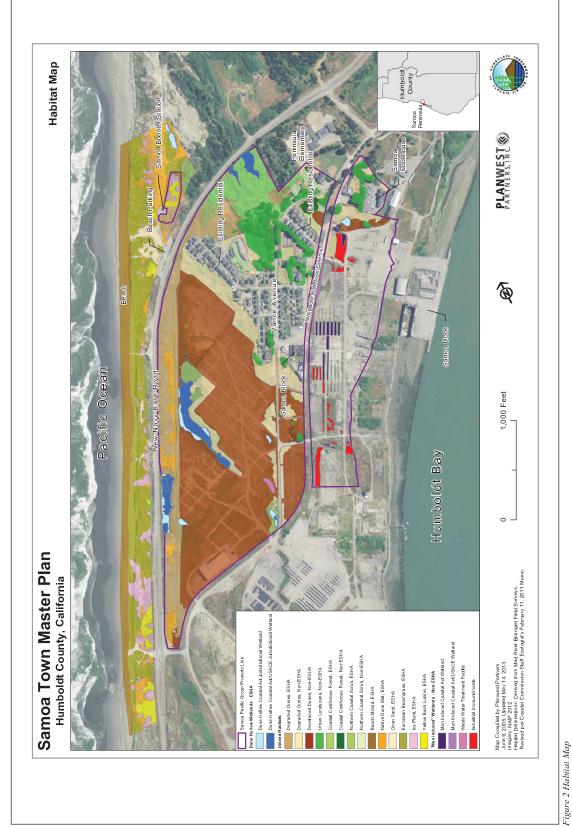
2.0 Environmental Setting and Historic Landscape Context

The plan area is located on the Samoa Peninsula, a 17-mile long barrier sand spit enclosing the northern section of Humboldt Bay in Humboldt County, California. Access to the property is from Highway 255 (also known as New Navy Base Road). The 171.7-acre property falls within the coastal zone and includes commercial and industrial zoned lands associated with historic lumber mill operations and the town of Samoa, as well as significant areas of undeveloped dunes, coastal scrub and coniferous forest zoned as Natural Resources.

Much of the study area is developed. The exception to this is a significant area of coastal coniferous forest and scrub found on stabilized dunes that abut the town at the north end of the plan area, and a strip of partially developed, degraded dunes that extend southwest from the forest/scrub habitat sandwiched between New Navy Base Road, a residential area, and the historic "log deck" along the western edge of the study area (Figure 2). The degraded dunes are remnant of a more expansive dune system that occurred prior to development of the town and mill

Like much of the Humboldt Bay region during the turn of the last century, the land that encompasses the plan area was re-shaped for utilitarian purposes. The construction of the mill, town of Samoa, and related systems began in the mid 1890's, and required grading, diking, filling of wetlands and the leveling of dunes. Artificial embankments and retaining walls can be seen throughout the existing town, which were used to stabilize the dunes and create level building sites, paths and roads. Topsoil was reportedly brought in and spread around the yards to enable the houses to have lawns and for civic landscaping (Heald et al. 2004). Plantings of non-native trees, shrubs and groundcovers are associated with managed yards, recreation areas and travel corridors.

Until 1923, the only transportation corridor was the railroad to Arcata and a ferry that crossed the bay to Eureka. A network of graveled roads, reinforced stairways and boardwalks provided access for pedestrians throughout the town and mill site. During the 1920's major upgrades of both the mill and the town were made, including the first road linking the Peninsula to communities north of Humboldt Bay. The new county road was completed in 1923 and connected to the short stretch of Vance Avenue that had been developed as the town was established. In support of the war effort, funding was provided in the 1940's to upgrade the county road by extending it south to the naval base and Fairhaven airstrip. Truck traffic and vehicles became more prominent with the upgrade. Until New Navy Base Road (Highway 255) was constructed in 1970, all Peninsula traffic went through Samoa on Vance Avenue, which was gravel and packed dirt, and reportedly the only place not covered with sand. (McCormick 1992 *in* Heald et al. 2004).



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Figures 3-5 depict the extent of development associated with the historic mill and company town of Samoa prior to construction of New Navy Base Road. The area south of the town and west of the mill remained undeveloped in 1947, comprising a natural dune system. By 1958, the dunes were partially graded into a network of roads and used for log storage. By 1962, the log deck was expanded to near its present day boundary and an industrial water line was constructed along its western edge to serve the mills on the Peninsula. Today, unpaved areas of the log deck show a significant accumulation of wood fiber and gravel fill and remain either un-vegetated or dominated by invasive, non-native plants.



Figure 3. Aerial view of Samoa millyard and docks prior to construction of New Navy Base Road, log deck, and water pipelines, 1947 (Humboldt County Public Works Department)



Figure 4. Aerial view of Samoa and early development of log deck, 1958 (Humboldt County Public Works Department)



Figure 5. Aerial view of Samoa and expansion of log deck and construction of first water line, 1962 (Humboldt County Public Works Department)

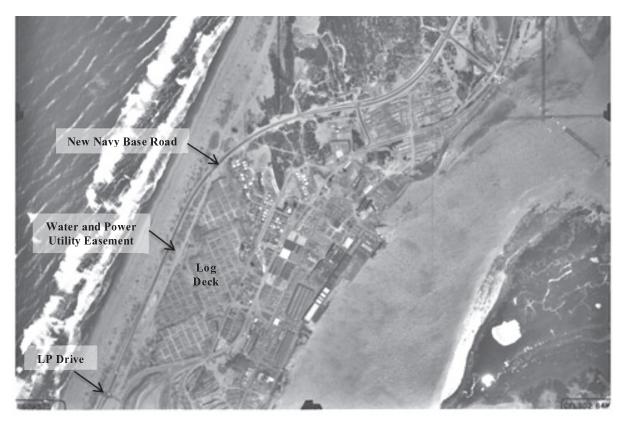


Figure 6. Aerial view of Samoa, including the newly constructed water/power line easement and New Navy Base Road, 1970 (Humboldt County Public Works Department)

New Navy Base Road and LP Drive (southern extent of plan area) were fully constructed by 1970, as shown in Figure 6. In the early 1970's, a domestic water line and aboveground transmission lines were added next to the industrial water line and the newly constructed highway (pers. comm. Dale Davidson, Humboldt Bay Municipal Water District (HBMWD)). Significant ground disturbance occurred with the installation of the utilities and construction of the highway, however, the area remained topped with sand and continued to exhibit some degree of natural dune processes.

Most of this area is currently dominated by invasive, non-native species such as European beach grass (*Ammophila arenaria*), ice plant (*Carpobrotus* sp), and yellow bush lupine (*Lupinus arboreous*). These plants in particular were once widely planted in coastal areas in an effort to stabilize dunes to protect roadways and other developments. Once established, they managed to spread rapidly, forming dense stands that altered the morphology of the dunes and displaced much of the native vegetation. Patches of open sand, native dune mat habitat and dune hollow wetlands remain, interspersed between the more degraded habitats.

HBMWD retains an easement within the utility corridor to maintain the water pipelines. Maintenance is conducted on the vaults at least once annually, with additional inspections occurring as needed (pers. comm. Dale Davidson, HBMWD). During maintenance and inspections, the easement is accessed by vehicle, which results in ground disturbance that helps to maintain areas of open sand suitable for the establishment of native plants, including locally rare species such as beach layia and dark-eyed gilia.

3.0 Environmentally Sensitive Habitats and Land Use Designations

In 2004, Mad River Biologists completed a biological resource study on behalf of the Samoa Pacific Group and County of Humboldt to identify biological constraints for the proposed Samoa Town Master Plan (STMP) (Mad River Biologists 2004). That report served as the basis for biological resource information presented in Chapters 2.04 and 4.04 of the environmental impact report prepared by Planwest Partners for the STMP (Planwest Partners 2007).

The California Coastal Commission reviewed these documents, and conducted a field investigation on December 7, 2010. Coastal Commission Ecologist, John Dixon, provided the results of his field review in a memorandum dated February 11, 2011. In this report, Mr. Dixon states that the various habitat areas, including wetlands, had been accurately characterized and mapped; however, he recommended changes to some of the descriptions of these areas in terms of use and habitat sensitivity.

Mr. Dixon identified several areas of "degraded dunes" located east of New Navy Base that were not classified as ESHA that warrant that designation due to the presence of natural dune processes, dune hollow wetlands, and remnant native dune mat vegetation. The first is the long strip of fenced dunes located within the HBMWD waterline easement between the abandoned log deck and New Navy Base Road. The second area is a continuation of the first, situated between New Navy Base Road, the residential housing, and the coastal coniferous forest/scrub ESHA at the north end of the plan area. There are three other small patches of degraded dunes with similar characteristics; one adjacent to New Navy Base Road and one above the Peninsula Elementary School, both of which are surrounded by wetlands and ESHA; and an irregular patch north of Vance Avenue that is contiguous with Coastal Coniferous Forest ESHA.

It was recommended that all of these remnant and degraded dune areas be considered ESHA due to their rarity and the ease with which they could be further degraded by human activity. Mr. Dixon also identified three small areas of remnant native vegetation that were designated as ESHA that he suggested removing from that designation due to their relative isolation.

In addition, a portion of the "waste water treatment facility" previously designated as non-ESHA, is thought to be a natural dune swale feature since it could not be proven that its creation and subsistence is dependent on artificial hydrological input, as suggested in the biological report. Dense vegetation associated with this swale area can be seen in aerial photos dating back to 1958 (Figures 4-6), which suggests that it may have been a natural hollow at one time, and therefore a convenient place to direct effluent from the treatment pond. This wetland hollow was reclassified as a regulatory wetland for planning purposes, as shown in Figure 7.

The Coastal Commission recommended that all the delineated wetlands west of the railroad easement be considered ESHA and provided with 100-foot development setbacks, as should the upland vegetation communities designated ESHA, and that the buffer areas be cleared of construction remnants, debris, and invasive non-native plants and restored to appropriate native vegetation, where such habitat is lacking.

The project applicants have incorporated these recommendations into the STMP to fulfill Policy 10 of the LCP Amendment, as shown in Figure 8. All delineated wetlands west of the railroad easement are designated as ESHA and provided a 100-foot development setback. Similarly, all upland vegetation communities designated as ESHA are afforded 100-foot development setbacks, except where truncated by existing development.

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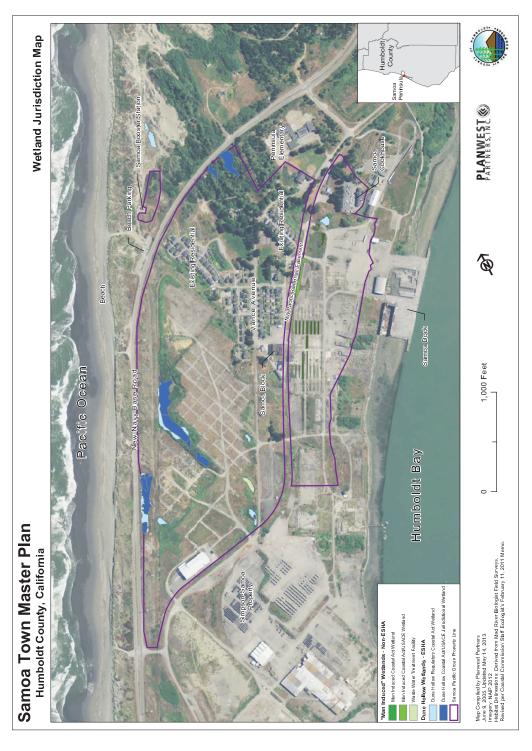


Figure 7 Wetland Jurisdiction Map

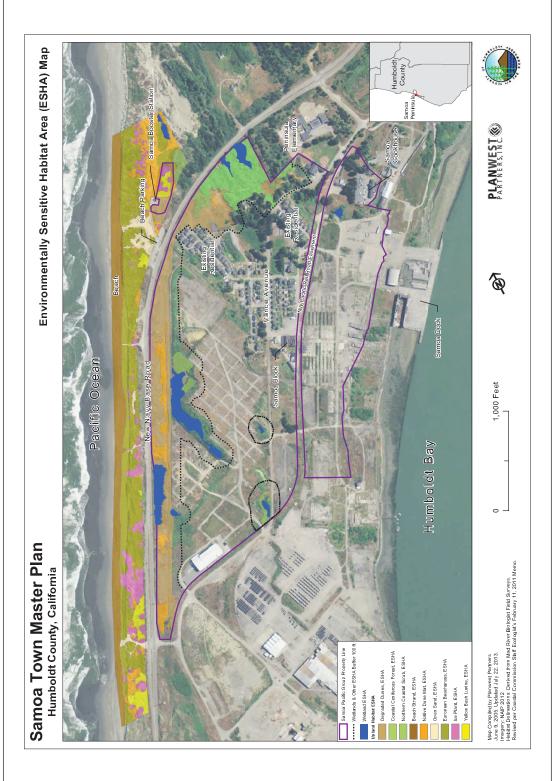


Figure 8 Environmentally Sensitive Habitat Areas and Established Buffers

4.0 Botanical Survey

Floristic surveys were conducted in 2013 for all development phases of the STMP except for the Coastal Access and Visitor Use Area of Phase 1 located west of New Navy Base Road. The biological resource information for the Coastal Access and Visitor Use Area was updated in 2009 by Mad River Biologists, and thus is not included in the current study.

A survey of the remaining development areas was performed to update existing resource data for the STMP, as required under the Humboldt Bay Area Plan. The updated information is provided as an addendum to the 2004 Biological Resource Report to comply with requirements for subdivision and Coastal Development Permit Approval by the County of Humboldt.

4.1 Methods

Prior to conducting field surveys, the list of Special-status plants with known occurrence in the project region was updated by performing a query of the California Department of Fish and Wildlife Natural Diversity Database (CNDDB 2013) and the California Native Plant Society On-line Inventory of Rare and Endangered Vascular Plants of California (CNPS 2013) for the Eureka 7.5 minute USGS quadrangle and eight adjacent coastal quadrangles (Arcata North, Tyee City, Arcata South, Trinidad, Crannell, Fields Landing, Fortuna, Cannibal Island, and Ferndale). Seventeen plant species were added to the list generated for the original biological study. These additions are listed in Table 1, along with an assessment of their potential for occurrence within the study area. Habitat suitability was evaluated using the following criteria:

Present. The species is known to occur within the study area, based on historical occurrence records and/or recent survey data.

High Potential. Habitat components meeting the species requirements are present and most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found in the study area.

Moderate Potential. Habitat components meeting the species requirements are present; however, some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found in the study area.

Low Potential. Some habitat components meeting the species requirements are present; however, the majority of habitat on and adjacent to the site is unsuitable. The species has a low probability of being found in the study area.

Not Present. Habitat on and adjacent to the site is clearly unsuitable for the species or recent survey data indicates that it currently does not occur within the study area.

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Table 1 Special-Status Plants Addressed for STMP Botanical Study - 2013 Additions

Species	Status*	Habitat Characteristics (CNDDB/CNPS 2013)	Potential for Occurrence
Angelica lucida	Rare Plant Rank 4.2	Coastal Bluff Scrub, Coastal Dunes, Coastal Scrub,	High Potential. Not found in the study area.
sea-watch	G5 / S2S3	Marshes and Swamps (coastal salt). 0-150m	
Astragalus rattanii var rattanii	Rare Plant Rank 4.3	Chaparral, Cismontane Woodland, Lower Montane Conference Forest Gravelly streambanks, 30, 825m	Known habitat characteristics Not Present within
Rattan's milk-vetch	G4T3 / S3.3	Connected to the control of connections.	siduy atca.
Cardamine angulata	Rare Plant Rank 2B.1	North Coast Coniferous Forest, Lower Montane	Historic record from Freshwater area. Known
seaside bittercress	G5 / S1	Coniferous Forest. Wet areas, streambanks. 65-915m	habitat characteristics Not Present within study area.
Carex lenticularis var limnophila	Rare Plant Rank 2B.2 G5T5 / S1S2.2	Bogs and Fens, Marshes and Swamps, North Coast Coniferous Forest. Lakeshores, beaches. 0-6m	Known habitat characteristics Not Present within study area.
lagoon sedge			
Castilleja litoralis	Rare Plant Rank 2B.2	Coastal Bluff Scrub, Coastal Dunes, Coastal Scrub.	Low Potential. Occurs mostly on coastal
Oregon coast paintbrush	G4G5T4 / S2.2	15-100m	bluff/scrub. Suitable habitat highly limited in study area. Not found in study area.
Clarkia amoena ssp whitneyi	Rare Plant Rank 1B.1	Coastal Bluff Scrub, Coastal Scrub. 10-100m	Low Potential. Historic record from Fortuna area
Whitney's farewell-to-spring	G5T2 / S2.1		(Sandy Prairie). Not found in study area.
Discelium nudum	Rare Plant Rank 2B.2	Coastal Bluff Scrub. Moss that grows on moist silty	Low Potential. Not found in study area.
naked flag moss	G3G4 / S1	to fine sandy banks of somewhat shaded sites. 5-1500m	
Erigeron bloomeri var nudatus	Rare Plant Rank 2B.3	Lower Montane Coniferous Forest, Upper Montane	Known habitat characteristics Not Present within
Waldo daisy	G5T4 / S2?	Coniferous Forest. In open areas on dry rocky outcrops on serpentine. 600-2300m	study area.
Juncus nevadensis var	Rare Plant Rank 2B.2	Bogs and Fens. 0-10m	Known habitat characteristics Not Present within
inventus	G5T3T4 / S1		study area.
Sierra rush			
Lilium kelloggii	Rare Plant Rank 4.3	Lower Montane Coniferous Forest, North Coast	Known habitat characteristics Not Present within
Kellogg's lily	G3 / S3.3	Coniferous Forest. Openings, roadsides. 3-1300m	study area.
Listera cordata	Rare Plant Rank 4.2	Bogs and Fens, Lower Montane Coniferous Forest,	Low Potential. Not found in the study area.
heart-leaved twayblade	G5 / S3.2	North Coast Coniferous Forest, 5-13/0m	

Table 1 Continued

ri var Rare Plant Rank 2B.2 G4T4 / S3 G4T4 / S3 ein orchid G3? / S2 ot Rare Plant Rank 4.2 ot G4G5 / S3.2 ore grass G4 / S3.2? retus Rare Plant Rank 4.2 ore grass G4 / S3.2? retus Rare Plant Rank 2B.2 ium G4 / S1	
Rare Plant Rank 1B.2 G3? / S2 Rare Plant Rank 4.2 G4G5 / S3.2 G4 / S3.2? Rare Plant Rank 2B.2 G4 / S1.2	nt Rank 1B.2 North Coast Coniferous Forest, Lower Montane Coniferous Forest, Broadleafed Upland Forest.
Hare Plant Rank 1B.2 G3? / S2 Rare Plant Rank 4.2 G4G5 / S3.2 Rare Plant Rank 4.2 G4 / S3.2? G4 / S3.2? Rare Plant Rank 2B.2 G4 / S1.2	nt Rank 1B.2 North Coast Coniferous Forest, Lower Montane Coniferous Forest, Broadleafed Upland Forest.
Hare Plant Rank 4.2 G4G5 / S3.2 Rare Plant Rank 4.2 G4 / S3.2? Rare Plant Rank 2B.2 G4 / S1.	Coniferous Forest, Broadleafed Upland Forest.
Rare Plant Rank 4.2 G4G5 / S3.2 Rare Plant Rank 4.2 G4 / S3.2? Rare Plant Rank 2B.2 G4 / S1	Coast ranges from Santa Cruz County north; on serpentine. 0-1200m
G4G5 / S3.2 Rare Plant Rank 4.2 G4 / S3.2? Rare Plant Rank 2B.2 G4 / S1	Plant Rank 4.2 Broadleafed Upland Forest, Lower Montane Known habitat characteristics Not Present within
Rare Plant Rank 4.2 G4 / S3.2? Rare Plant Rank 2B.2 G4 / S1	/ S3.2 Coniferous Forest, North Coast Coniferous Forest, Study area. Upper Montane Coniferous Forest. 15-2225m
G4 / S3.2? Rare Plant Rank 2B.2 G4 / S1	Plant Rank 4.2 Lower Montane Coniferous Forest, Meadows and Low Potential. Not found in the study area.
n Rare Plant Rank 2B.2 G4 / S1	
G4/S1	Plant Rank 2B.2 Coastal Prairie, Coastal Scrub, Lower Montane Low Potential. Not found in the study area.
ر 1 - م	Coniferous Forest. 0-1830m
	Rare Plant Rank 4.3 North Coast Coniferous Forest, sometimes roadside. Low Potential. Not found in the study area.
trailing black currant G5 / S3.3 5-1395m	

*TABLE 1 STATUS CODES:

CNDDB Element Ranking:	al R	State Ranks State Ranks SI Very Threatened S2 Imperiled S3 Vulnerable
CNI	Glob G3 G4	State State S1 S2 S3
California Rare Plant Ranks:	 1B Rare, threatened, or endangered in California and elsewhere 2B Rare, threatened, or endangered in California, but more common elsewhere 4 Plants of limited distribution – a watch list. 	Corresponding Threat Ranks: 0.1 Seriously threatened in California 0.2 Moderately threatened in California 0.3 Not very threatened in California

Seasonally appropriate surveys were performed on April 19th and 22nd, May 23rd and 24th, and June 18th by Stephanie Morrissette, a local botanist with over 20 years of experience working with local coastal species. Surveys were conducted for all target plants listed in the original biological study and the additions listed in Table 1 for which suitable habitat was deemed present.

The distribution of rare plant occurrences was recorded and mapped using a Trimble Juno SB handheld GPS. Native Species Field Survey Forms were completed for each rare plant occurrence, which are included as Attachment 2. A list of species encountered during the field investigation is included as Attachment 1.

4.2 Results of Rare Plant Survey

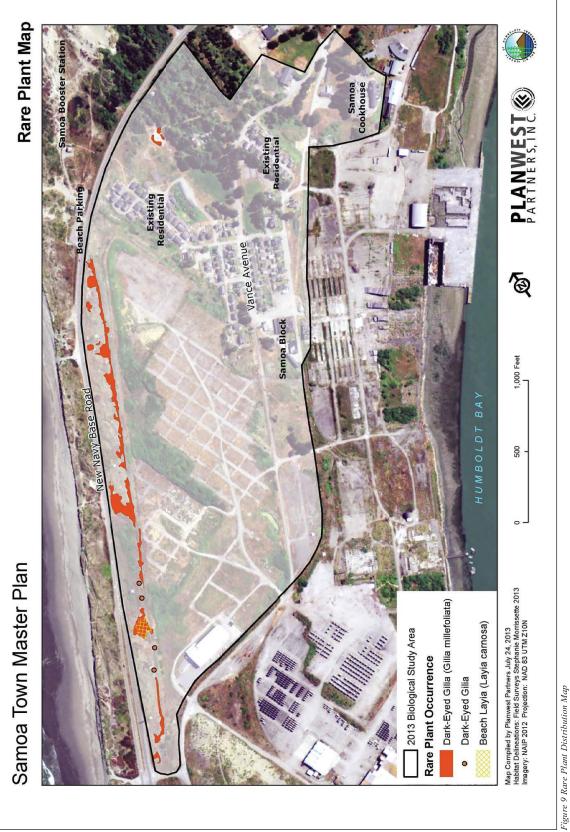
Beach layia (*Layia carnosa*) and dark-eyed gilia (*Gilia millefoliata*) were relocated within the water/power utility line easement between New Navy Base Road and the former log deck, and within an open sand area next to the forest/scrub habitat at the north end of the plan area. They were found generally in the same locations as they were in 2003/2004 but occupying slightly larger representative areas, as shown in Figure 9. No other Special-status plants were found within the study area during the 2013 survey effort.

Beach layia is a California endemic that is both state and federally listed as endangered throughout its limited range. Dark-eyed gilia is not state or federally listed, but it is considered endangered in a portion of its range, rare outside of California, and distributed in a limited number of occurrences. Both are locally common in the dunes on the Samoa Peninsula, where they are typically associated with the native dune mat community, but they also occur along edges and sandy openings of dunes dominated by invasive exotic plants.

Beach layia requires areas of open sand to colonize and cannot establish itself in the thick vegetative cover of nonnative plants that similarly inhabit the dunes of the plan area. It was observed within one small section of the utility easement associated with native dune mat species such as coast buckwheat (*Eriogonum latifolium*), beach bur (*Ambrosia chamissonis*), beach evening primrose (*Chamissonia cheiranthifolia*), dune knotweed (*Polygonum paronychia*), coast goldenrod (*Solidago spathulata*), beach pea (*Lathyrus littoralis*), sand mat (*Cardionema ramosissimum*), and dark-eyed gilia.

Dark-eyed gilia was observed growing over a larger area of the utility easement, often within lower quality habitats such as those impacted by light vehicle and foot traffic and areas dominated by invasive-exotic plants. Common associates include native dune mat species but also non-native grasses and forbs such as ripgut brome (*Bromus diandrus*), hairgrass (*Aira praecox*), sheep sorrel (*Rumex acetosella*), rattlesnake grass (*Briza maxima*), vulpia (*Vulpia bromoides*), and rough cat's ear (*Hypochaeris radicata*). Dark-eyed gilia was most abundant within the vehicle corridor along the HBMWD easement where light truck traffic retained areas of open sand suitable for colonization.

Both the beach layia and the dark-eyed gilia occur within an area that has been designated as environmentally sensitive and afforded a 100-foot setback from proposed development. No impacts to these occurrences are anticipated from site development.



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5.0 Invasive Plant Management Plan

A number of invasive plants occur within the plan area, some of which are known to have severe ecological impacts on the physical and biotic structure of natural communities. Given the proximity of the plan area to Environmentally Sensitive Habitat Areas (ESHA), both on and adjacent to the site, a phased management plan for the control and eradication of certain ecologically significant, invasive plants has been developed to mitigate potential negative impacts caused by these species.

Key components of the invasive plant management plan include:

- Phased removal of certain highly invasive plant species identified within the plan area where development is proposed and within ESHA buffers.
- Provision for the immediate re-vegetation of cleared lands following site development.
- Provision for the use of regional, native plant species for the re-vegetation of ESHA buffers, and use of native or non-native but *non-invasive* plants for re-vegetation of urban and residential areas.
- Survey of the plan area five years post phased-development to document the results of the eradication efforts and to identify remediation measures, if needed.

The botanical inventory for the study area is included as Attachment 1. Each species is identified as either native or non-native to California. Non-native species are further identified by their California Invasive Plant Council (Cal-IPC) inventory database rating, when applicable. Cal-IPC uses a rating system that recognizes the following three levels of threat:

- **High** These species have 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. Most are widely distributed ecologically.
- Moderate These species have substantial and apparent—but generally not 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, though establishment is generally dependent upon ecological disturbance. Ecological amplitude and distribution may range from limited to widespread.
- **Limited** These species are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic.

Forty-three plant species documented within the study area are listed in the Cal-IPC database (Table 2). Six of these are considered highly invasive and will be targeted for eradication during site development. One additional species, yellow bush lupine (*Lupinus arboreous*), will also be targeted for removal. Although native to central and southern California, yellow bush lupine is considered invasive to local dunes where it has been shown to replace native plant communities with a dense monoculture of shrubs. It has also been shown to cause ecosystem-level changes by elevating nitrogen levels that in turn facilitate invasion by non-native, weedy grasses (Pickart et al. 1998).

 Table 2
 Invasive Non-Native Plants Occurring within the Study Area

l-IPC Threat Rating	Species	Common Name
HIGH		
	Ammophila arenaria	European beachgrass
	Carpobrotus edulis x chilensis	iceplant, sea fig
	Cortaderia jubata	jubata grass
	Cytisus scoparius	Scotch broom
	Hedera helix	English ivy
	Rubus armeniacus	Himalayan blackberry
MODERATE		
	Anthoxanthum odoratum	sweet vernal grass
	Bromus diandrus	ripgut grass
	Cirsium vulgare	bull thistle
	Cotoneaster franchetii	cotoneaster
	Cynosurus echinatus	hedgehog dogtail
	Dipsacus fullonum	Fuller's teasel
	Eucalyptus globulus	eucalyptus
	Festuca arundinacea	tall fescue
	Festuca perennis	ryegrass
	Geranium dissectum	cranesbill, geranium
	Holcus lanatus	velvet grass
	Hypochaeris radicata	rough cat's ear
	Ilex aquifolium	holly
	Leucanthemum vulgare	oxeye daisy
	Mentha pulegium	pennyroyal
	Rumex acetosella	sheep sorrel
	Senecio glomeratus	cutleaf burnweed
	Senecio minimus	coastal burnweed
	Trifolium hirtum	rose clover
	Vinca major	periwinkle
LIMITED		
	Agrostis stolonifera	creeping bent grass
	Brassica rapa	field mustard
	Briza maxima	rattlesnake grass
	Bromus hordeaceus	soft chess
	Cakile maritima	sea rocket
	Cotula coronopifolia	brass buttons
	Cupressus macrocarpa	Monterey cypress
	Dactylis glomerata	orchard grass
	Erodium cicutarium	storksbill, filaree
	Lythrum hyssopifolium	hyssop loosestrife
	Medicago polymorpha	California burclover
	Parentucellia viscosa	yellow parentucellia
	Pinus radiata	Monterey pine
	Plantago lanceolata	English plantain
	Polypogon monspeliensis	annual beardgrass
	Ranunculus repens	buttercup
	Rumex crispus	curly dock

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5.1 Invasive Plant Removal

In June of 2013, a survey for invasive plants was performed within the study area. Ecologically significant species were mapped within the town of Samoa, as shown in Figure 10. Detailed mapping of the former log deck area proved infeasible due to the high concentration and variability of invasive plants that occur there, and was therefore mapped generally as "Invasive Plant Area". This area will be entirely cleared and graded prior to site development, thereby allowing for mass removal of the invasive and other non-native plants that currently dominate the site, including those classified as having a limited or moderate Cal-IPC threat level.

Non-native trees within the plan area with moderate or limited Cal-IPC threat ratings will be retained since they provide significant avian habitat in addition to ornamental value. These include the eucalyptus, Monterey pine, and Monterey cypress found lining Vance Avenue and adjacent to residential and park areas.

Due to the close proximity of environmentally sensitive habitats, including wetlands, invasive plant eradication efforts will utilize mechanical or manual removal methods. The use of heavy equipment is practical in many locations, and is considered appropriate given the significant level of ground disturbance anticipated with site development, as well as the relative cost savings and efficacy compared to other methods such as chemical treatments that involve the use of herbicides or manual efforts such as hand pulling. Manual methods that rely on hand tools and/or hand pulling may be required in areas where access is limited for heavy equipment. Manual methods shall also be utilized for removing invasive plants located within and near ESHA boundaries to avoid impacting these sensitive habitat areas.

As with site development, best management practices (BMPs) shall be incorporated for invasive plant removal activities to ensure the protection of existing ESHAs and to avoid the inadvertent introduction and/or spread of invasive plants. BMPs to be incorporated include the following:

- During wet weather conditions, silt fencing and/or straw wattles shall be utilized to
 protect wetland areas from potential sedimentation during activities associated with
 ground disturbance or vegetation removal when operating near wetland ESHA
 boundaries.
- Upland and wetland ESHA boundaries will be clearly marked in the field to denote limits of operations prior to any ground disturbance or vegetation removal within ESHA buffer areas.
- To avoid the inadvertent spread of invasive species, vehicles, equipment, and clothes shall be clean of mud and plant debris prior to initiating invasive plant removal and before leaving the property after conducting invasive plant removal.
- Invasive plant material shall be properly handled and disposed of to avoid future infestations.

Specific criteria and recommendations for plants targeted for removal are provided below:

European Beachgrass (Ammophila arenaria)

European beachgrass is a dominant species of the open dunes within and adjacent to the plan area. Within the plan area it occurs on remnant dunes next to New Navy Base Road that have been designated as ESHA, and is patchily distributed elsewhere on sandy substrates that border the former log deck, including ESHA buffers.

European beachgrass will not be targeted for removal where site development is not planned or within the ESHA-designated dunes. Efforts shall be made to remove plants from the former log deck and associated ESHA buffer areas (i.e. Invasive Plant Area shown in Figure 10) by means of mechanical removal performed coincident to clearing and grading associated with site development. Habitats identified as "Degraded Dunes, Non-ESHA" in Figure 2: Habitat Map, denote the general location of European beachgrass within the Invasive Plant Area of the former log deck. In these areas, co-dominant species include other highly invasive plants such as yellow bush lupine and iceplant.

European beachgrass is a rhizomatous perennial grass that is able to withstand up to 1 meter a year of sand burial. It rarely becomes established by seed, but once established it expands through vigorous rhizome growth. Shoots grow most vigorously in the spring. Spring through fall is the optimal time to target eradication. Heavy equipment may be used to remove plants by excavating the substrate to a depth of one meter or more. Excavated areas will then be capped with clean sand (in ESHA buffer areas) or fill material where development is planned. Plants occurring along ESHA boundaries will require hand digging (with shovels/rakes) to minimize soil disturbance within the ESHAs. Where hand digging is performed, monthly follow-up treatments conducted through the fall may be required to remove re-sprouts. Resprouting may be minimized through careful sifting of the sand to remove rhizome fragments within the top 0.5 to 1 m of substrate during the initial removal effort.

Removed plant material will be burned or composted. If opportunity exists, plant material may be buried on site to a depth of *at least* one meter to discourage re-sprouting.

Iceplant / Sea Fig (Carpobrotus edulis and C. edulis x chilensis)

Iceplant is a low-growing succulent perennial that roots at the nodes, has a creeping habitat, and often forms deep mats covering large areas. Large clonal mats of iceplant occur throughout the town of Samoa, the former log deck, and open dunes within the plan area.

Mechanical removal by tractor is efficient for areas where there are no sensitive resources. To prevent significant soil removal, the use of a brush rake attached to the scoop is recommended (Pickart *in* Bossard 2000). It is also easily removed by hand pulling for areas inaccessible to heavy equipment or along ESHA boundaries where ground disturbance shall be minimized.

Because the plant can grow roots and shoots from any node, all live shoot segments must be removed from contact with the soil to prevent re-sprouting. At least one follow-up visit may be required to remove re-sprouts from areas not immediately developed. Due to the high water content of the shoot tissues, burning of live or dead plants is not a useful method of control or disposal. Removed vegetation will need to be dried prior to disposal. Once dry it may be burned or composted.

Jubata Grass (*Cortaderia jubata*)

Jubata grass is a perennial grass six to twenty feet tall with long leaves arising from a tufted base. Flowers are produced from late July to September in a long-stemmed, plumed inflorescence.

Within the plan area, efforts have been made to control this species, which was once abundant on the former log deck, the railroad easement, and within the Coastal Dependent-Industrial Area. Currently, scattered occurrences persist along the railroad easement, the former log deck, along the edges of the forest and within the town. Two plants were also observed within the utility easement / dune ESHA next to New Navy Base Road, as shown in Figure 10.

Grading of the Invasive Plant Area is expected to effectively remove seedlings and larger established plants occurring in this area. In areas inaccessible to heavy equipment, including ESHA boundaries, hand pulling or use of hand tools will be employed. Hand pulling jubata grass seedlings has been shown to be highly effective (Bossard et al. 2000). For large plants, a Pulaski, mattock, or shovel are the safest and most effective tools for removing established clumps. To prevent re-sprouting it is important to remove the entire crown and top sections of the roots. To reduce labor, the top foliage can be removed and the remaining crown treated with diesel oil (Cowan 1976 *in* Bossard et al. 2000). This method may be most useful within the railroad easement where established plants occur between the railroad ties where digging may prove difficult. The use of diesel oil shall not be employed as treatment for any plants occurring within 100 feet of any ESHA boundary.

Owing to the highly invasive nature of this species and feasibility of complete eradication within the plan area, it is recommended that the two small occurrences within the utility easement (dune ESHA) also be removed by using hand tools. This is best performed in late June, before flower production of Jubata grass and after the peak blooming period for the locally rare plants, beach layia and dark-eyed gilia, that also occur within the easement.

Grading of the log deck and spot removal treatments elsewhere shall be conducted prior to flower production in July to prevent seed dispersal. Once removed, the plant material will be laid out on a bare area (ideally on sheets of black plastic) and left to dry. Dried material may either be composted or burned, depending on local regulations.

Scotch Broom (Cytisus scoparius)

Scotch broom is a perennial shrub six to ten feet tall, with sharply angled branches and yellow pea-like flowers. It grows in sunny sites with dry sandy soil. It is common in disturbed places but can also colonize undisturbed grassland, shrubland, and open canopy forests. It has a seed bank that can remain dormant for up to 80 years.

Within the plan area, Scotch broom occurs sporadically within the town, the former log deck, in the vicinity of the Samoa Cookhouse, and edges of the coniferous forest. Grading of the former log deck is expected to effectively remove seedlings and larger established plants occurring in this area. In areas inaccessible to heavy equipment, including ESHA boundaries, the use of hand tools will be employed.

The most effective approach for the removal of Scotch broom is an integrated approach that involves cutting the shrubs in September and October (to minimize re-sprouting), allowing the cut shrubs to dry on site, and then burning dried material in late May and early June. The use of a brush hog or saw cutting is preferred over hand pulling since the latter has been shown to result in significantly more trampling of native species, greater soil disturbance, and broom seedling regeneration (Bossard et al. 2000).

Because this species produces a prolific seed bank, monitoring of treatment areas will be important to locate and kill new seedlings. Location and treatment of re-sprouts is also important. Monitoring should be conducted when seed germination ends in late spring for the first two years following removal, and then again on the fifth year after removal and/or any ground disturbance associated with site development.

Yellow Bush Lupine (*Lupinus arboreus*)

Yellow bush lupine is a bushy shrub that grows to six feet tall, usually with bright yellow (sometimes blue) sweet smelling flowers, and green, palmately compound leaves. Flowering takes place locally from May to July, and seed dispersal occurs in late summer and fall. It reproduces solely by seed. Seeds are long-lived and form a persistent seed bank, creating a need for repeated removal.

Within the plan area, yellow bush lupine occupies many of the same areas as Scotch broom. Within the Invasive Plant Area of the former log deck, grading performed in conjunction with site development is expected to effectively remove seedlings and larger established plants. Within the town and areas inaccessible to heavy equipment, including ESHA boundaries and the coniferous forest ESHA, the use of hand tools will be employed. Mature plants will be removed by cutting them at the base of the trunk, and splitting the trunk to discourage resprouting. Small plants can be pulled by hand. Removal efforts shall be conducted prior to seed set, and removed vegetation shall be dried and burned or composted.

Soil disturbance may stimulate seed germination from the seed bank; therefore, monitoring conducted during the flowering period will need to be performed within five years following removal. Stapling weed mat to the substrate where plants are removed for a period of two years may minimize the need for follow-up treatments of new recruitments.

Himalayan Blackberry (*Rubus armeniacus*)

Himalayan blackberry is a sprawling shrub that forms dense thickets of long, bending branches (canes) with hooked prickles, white flowers, and black berries that usually ripen later than the native blackberry. It is a strong competitor with other species, and possesses a highly versatile means of reproduction. Thickets can produce 7,000 to 13,000 seeds per square meter (Amor 1974 in Bossard et al. 2000), which are readily dispersed by gravity, and by birds and mammals. Seeds can remain viable in the soil for several years (Brinkman 1974 in Bossard et al. 2000). Seeds germinate in the spring, flowering begins in May and continues through July, and fruit is produced from July to September.

Within the plan area Himalayan blackberry occurs sporadically along roadways throughout the town, in the understory of shrub and forest habitats, and within the Invasive Plant Area of the former log deck where it densely lines the fence that separates the log deck from the utility easement/degraded dune ESHA next to New Navy Base Road.

For removal, care will need to be taken to prevent vegetative reproduction from cuttings. Removal of canes alone is insufficient, as root crowns will re-sprout and produce more canes. Mechanical techniques that incorporate the use of heavy equipment to grade substrates to depths sufficient to remove root crowns are appropriate for the Invasive Plant Area. Removing rootstocks by hand digging is a slow but effective method for small infestations around houses, trees and shrubs, and within ESHAs where the use of heavy equipment is not practical or feasible.

The best time for removal is when the plants begin to flower in May. At this stage the reserve food supply in the roots has been nearly exhausted, and new seeds have not yet been produced. Burning slash piles is an effective method of disposal.

English Ivy (Hedera helix)

English ivy is a woody evergreen vine commonly found in moist, shady woodlands. It is especially common in forest habitats near urban areas, where it uses adventitious roots to climb up tree trunks and along branches into the canopy. It also grows as a dense ground cover where it inhibits regeneration of understory plants. English ivy spreads primarily by rhizomes, but it can also reproduce from seed. It will grow as a vine and groundcover for up to 10 years before flowering. It has a shallow root system, but can re-sprout from cut roots as small as half an inch that are left in contact with soil.

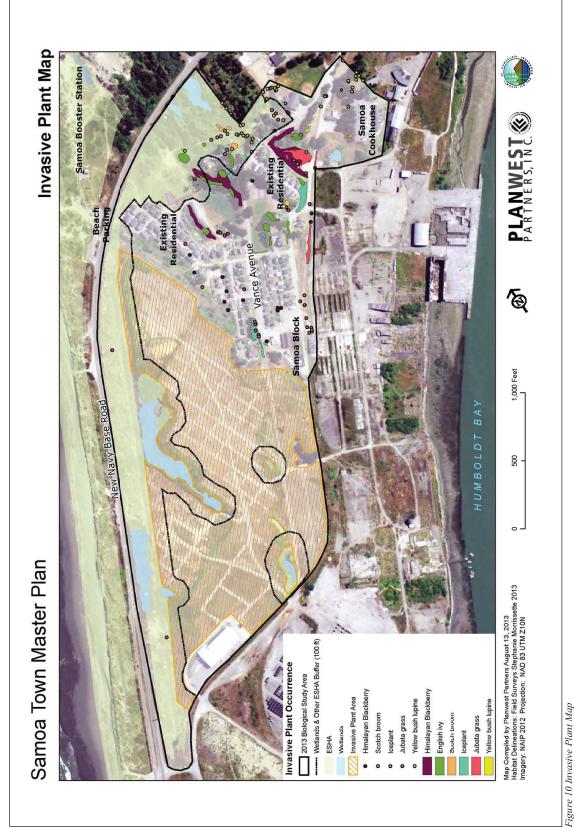
Within the plan area, English ivy is found as a ground cover and growing up the trunks of trees in urban landscape areas of the town. It is also found on the edge of the coniferous forest habitats growing on native spruce and pine.

Physical removal of English ivy is best accomplished by using pruners to cut the vines from around the base of trees and then pulling the plants up from the roots and down from the trees. Removing the vines that spread up into the trees is important because the fertile branches grow primarily on the upright portions of the vine (Bossard et al. 2000), although the vine will eventually die without access to the roots. Vines on the ground shall also be removed (dug up with a shovel) to prevent re-sprouting. Once removed, the plant material may be left to decompose on a tarp on-site and then burned or composted.

 Table 3
 Summary of Invasive Plant Removal Methods

Species	Optimal Removal Period	Disposal ¹	Follow-up Treatment
European Beachgrass	Spring through fall	Dry and burn, or bury on- site at least 1 meter deep	Monthly through the fall in first year where hand pulling is performed.
Iceplant	Any time of year	Material must be dried due to high water content prior to burning or composting	At least once following treatment where hand pulling is performed.
Jubata Grass	June within ESHA before July elsewhere	Dry and burn or compost	As identified from annual spring monitoring
Scotch broom	September - October	Dry then burn May-June	As identified from annual spring monitoring
Yellow bush Lupine	May through June	Dry and burn or compost	As identified from annual spring monitoring
Himalayan Blackberry	May	Dry and burn or compost	As identified from annual spring monitoring.
English Ivy	Spring but effective any time of year	Dry and burn or compost	As identified from annual spring monitoring.

¹ Drying of removed material best performed on tarp or sheet of black plastic when feasible



Ania manta manta man

5.2 Re-Vegetation Guidelines

The Cal-IPC maintains a list of invasive plants that are serious problems in areas that support native ecosystems. The most current version of this list is provided on line at: http://www.cal-ipc.org/ip/inventory/index.php#inventory. Re-vegetation plans shall exclude any plant species listed by Cal-IPC, regardless of threat level.

Non-native, non-invasive plants may be utilized within commercial and residential areas for landscaping purposes, although native species will be incorporated to the greatest extent possible. Only locally native species adapted to the habitats of the plan area shall be used for landscaping of ESHA buffers. All planting plans shall be approved by a qualified biologist prior to installation to insure that selected species are appropriate for a given area.

Spot treatments of invasive plants will not require re-vegetation where infestations are small and ground disturbance is minimal. Where significant ground disturbance occurs from invasive plant removal and/or site development in areas designated for open space, re-vegetation will proceed by the next suitable planting season following the disturbance. If re-vegetation is delayed through the rainy season, disturbed areas shall be covered and secured with landscape fabric to minimize soil erosion.

5.3 Post-Development Monitoring

Invasive plant treatment areas shall be monitored annually during the spring for a period of five years to evaluate the success of eradication efforts, and to identify corrective actions as needed. Annual monitoring of the plan area will allow for early detection of failed treatments and/or new recruitment within areas subject to significant ground disturbance associated with site development.

Monitoring shall be conducted by a qualified biologist familiar with all growth phases of the species targeted for removal. Success shall be defined as the absence of ecologically significant invasive plants within areas targeted for restoration, and other areas subject to significant ground disturbance from site development, for a period of five years following removal/site development. Ecologically sensitive invasive plants include all those targeted for eradication and any previously undocumented species with a Cal-IPC threat rating of high that may have been inadvertently introduced during site development.

Monitoring may be phased based on the timeline of development. Annual monitoring reports shall be submitted to the County of Humboldt within 30 days of each inspection. Success of the invasive plant removal project will be fully assessed following the last field inspection. If after five years, restoration objectives have not been met, corrective measures will be implemented and an additional two years of monitoring will ensue. Remediation may include a reassessment of site conditions, additional planting and/or invasive plant removal.

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	Scientific Name ²	Common Name	Status	Cal-IPC Rating
Trees	Abies grandis	grand fir	Native	
	Cupressus macrocarpa	Monterey cypress	Introduced	Limited
	Eucalyptus globulus	eucalyptus	Introduced	Moderate
	Picea sitchensis	Sitka spruce	Native	
	Pinus contorta ssp contorta	beach pine	Native	
	Pinus radiata	Monterey Pine	Introduced	Limited
	Pittosporum tenuifolium	pittosporum	Introduced	
	Salix hookeriana	Hooker willow	Native	
	Salix lasiandra ssp lasiandra	Pacific willow	Native	
Shrubs	Arctostaphylos uva-ursi	bearberry	Native	
	Baccharis pilularis	coyote brush	Native	
	Cotoneaster franchetii	cotoneaster	Introduced	Moderate
	Cytisus scoparius	scotch broom	Introduced	High
	Garrya elliptica	silk tassel	Native	
	Gaultheria shallon	salal	Native	
	Hedera helix	English ivy	Introduced	High
	Lonicera involucrata	twinberry	Native	
	Lupinus arboreus	yellow bush lupine	Introduced	Limited
	Myrica californica	wax myrtle	Native	
	Vaccinium ovatum	evergreen huckleberry	Native	
Herbs	Abronia latifolia	yellow sand verbena	Native	
	Achillea millefolium	yarrow	Native	
	Acmispon americanus var americanus	Spanish lotus	Native	
	Acmispon parviflorus	hill lotus	Native	
	Acmispon strigosus	strigose lotus	Native	
	Agoseris grandiflora	agoseris	Native	
	Agrostis stolonifera	creeping bent grass	Introduced	Limited

² Nomenclature conforms to *The Jepson Manual: Vascular Plants of California* 2nd Edition. Baldwin et al. 2012.



California Natural Diversity Database
California Dept. of Fish & Wildlife
1807 13th Street, Suite 202
Sacramento, CA 95811
Fax: (916) 324-0475 email: CNDDB@wildlife.ca.gov

Date of Field Work (mm/dd/vvvv): 4/19/2013

	For Office Use Only	,
Source Code	Quad Code	
Elm Code	Occ. No	
EO Index No	Map Index No	

Scientific Name:	California N	ative Species Field Sur	vey Form	Send Form
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Species Found? Total No. Individuals Is this an existing N Collection? If yes:	Yes No If not, when the second of the second	y?	ephanio Morris o sea Avenue ureka, CA.95: Stephanie. mor) 496-1952	203
Plant Information		Animal Information		
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T R Sec_ DATUM: NAD: Coordinate System		ridian: H M S Source of Coord ridian: H M S GPS Make & Mo SS84 Horizontal Accur	moa Pacific of Humbol Elevation: tinates (GPS, topo, map odel SB racy de & Longitude)	22 feet & type): GPS
Animal Behavior Growing on historic log	(Describe observed behavior, such a remnant dunes be deck in Samoa cuable common	ommunities, dominants, associates, substrates territoriality, foraging, singing, calling, copular within while y corridor associates include on a chamissonia che cantula	ling, perching, roosting, etc., Navy Base Roo Substrate is lia millefoliata	nd) and sand, Ambrosia
Chamissonis, Friogonum la Please fill out separate	form for other rare taxa seen at this	chamissonia che ranthico ethulata Lupinus bicolor, site. Claytonia sp., Cardione (viability (site + population): Excel	Daucus puccilli ema ramosissimo	paronychia; us Rumex aceto um, Cryptan tha Fair Poor

For Office Use Only California Natural Diversity Database California Dept. of Fish & Wildlife Quad Code Source Code 1807 13th Street, Suite 202 Sacramento, CA 95811 Occ. No. Elm Code email: CNDDB@wildlife.ca.gov Fax: (916) 324-0475 Map Index No. EO Index No. Date of Field Work (mm/dd/yyyy): 4/19/2013 Send Form California Native Species Field Survey Form Reset Scientific Name: Solia millefoliata Dark-eyed Gilia Common Name: Stephanie Morrisselle Species Found? Address: 1010 sea Avenue If not, why? Total No. Individuals Census Subsequent Visit? Dyes □ no Is this an existing NDDB occurrence? $\frac{\cancel{\cancel{45}}}{\text{Yes, Occ. #}}$ no unk. E-mail Address: Stochame morrisse Te @ gmail.com Phone: (707) 496-1952 Collection? If yes: Museum / Herbarium Number **Animal Information** Plant Information Phenology: # egg masses # unknown # adults other burrow site 30 Location Description (please attach map AND/OR fill out your choice of coordinates, below) Samoa Pacific Group and Landowner/Mgr.: County of Humbouth County: Humboldt Source of Coordinates (GPS, topo, map & type): GPS _ R ____ Sec ____, ____¼ of _____¼, Meridian: H□ M□ S□ GPS Make & Model Juno 5B T____ R____ Sec ____, ____¼ of _____¼, Meridian: H□ M□ S□ DATUM: NAD27 ☐ NAD83 ☑ WGS84 ☐ Horizontal Accuracy Coordinate System: UTM Zone 10 UTM Zone 11 Geographic (Latitude & Longitude) Coordinates: 399405 E 4518976 N Habitat Description (plants & animals) plant communities, dominants, associates, substrates/soils, aspects/slope: Animal Behavior (Describe observed behavior, such as territoriality, foraging, singing, calling, copulating, perching, roosting, etc., especially for avifauna): Growing on remnant dunes between thighway 255 and historic log deck in Samoa, within utility (water/power) corridor. Sandy substrate, variable aspect.
Common associates include: Rumex acetosella, Plantago erecta, Bromus dianarus aira praecox, Cardionema ramosissimum, Hypochaeris radicata, Cryptantha leiocarpa. Higher quality Kabitat Associates: Abronia latifolia, Eriogonum latifolium, Lupinus bicolors Please fill out separate form for other rare taxa seen at this site. Polygonum paronychia, Layia carnosa ☐ Excellent Site Information Overall site/occurrence quality/viability (site + population): Immediate AND surrounding land use: Recreational, Residential, and light industrial Visible disturbances: Light whicle a foot traffic associated with routine maintenance of Tollow-up survey to re-document vare plant distributions Br the water & power lines. Print Digital Photographs: (check one or more) Determination: (check one or more, and fill in blanks)

Compared with photo / drawing in: _ By another person (name): _

Other:

Jepson Manual

 \exists

Plant / animal

May we obtain duplicates at our expense? ves ☐ no ☐

Habitat Diagnostic feature