H. T. HARVEY & ASSOCIATES
Ecological Consultants

March 1, 2018

Natalie Noyes
Project Manager, David J. Powers & Associates
1611 Telegraph Avenue, Suite 1002
Oakland, CA 94612

Subject: 459/469 Piercy Road Hotel, VHP Rare Plant Habitat Assessment (Project 4144-01)

Dear Ms. Noyes:

In response to your request, H. T. Harvey & Associates has assessed the suitability of habitat for serpentine-adapted rare plant species on the approximately 2.0-acre parcel at 459 Piercy Road and the approximately 3.6-acre parcel at 469 Piercy Road in San Jose, California (Assessor's Parcel Numbers 678-93-039 and 678-93-040).

The Santa Clara Valley Habitat Agency's Geobrowser (2018) identifies the entirety of both parcels as locations where surveys may be required for plant species covered by the Santa Clara Valley Habitat Plan (VHP). The Geobrowser further identifies the "urban-suburban" land cover type as dominating the vast majority of the parcels. Also, according to our background review, the parcels are mapped as being underlain by one soil type: Urban-land-Elpaloalto complex, 0–2% slopes (NRCS 2018). Soils in this complex consist of very deep, well-drained soils that formed in alluvium from mixed rock sources and do not include serpentine soils. Nevertheless, a very narrow sliver of serpentine bunchgrass grassland (less than 0.01 acre) is mapped along the northeastern edge of both parcels. Serpentine habitats are known to support VHP-covered rare plants, so a field assessment of actual habitat suitability was warranted.

On February 14, 2018, H. T. Harvey & Associates qualified plant ecologist Matthew Mosher, B.S., hiked the parcels to assess habitat suitability. Mr. Mosher also observed an area known to be underlain by serpentine soil, located approximately 500 feet off site to the northeast, to compare the vegetation stature, cover, and to the extebnt possible to determine in winter, composition between the two areas.

The Habitat Agency's (2018) land cover mapping was done at a relatively large scale (up to 10-acre units) using aerial photographs, and may be imprecise in some areas for this reason. Accordingly, the VHP requires land cover verification to correct inaccuracies and increase mapping precision on a project by project basis. During the field visit, the plant ecologist identified two land cover types were identified on the parcels: (1) California annual grassland and (2) urban-suburban. No evidence of serpentine bunchgrass grassland was encountered on the parcels. Descriptions of each of the verified land cover types are presented below.

California Annual Grassland

On the parcels this land cover type is dominated by nonnative grasses and forbs. The parcels support wild oats (*Avena* sp.) and additional nonnative annual grasses that could not be identified because the survey took place before grasses were flowering. The parcels also support a thick growth pf many nonnative forbs and invasive weeds, including black mustard (*Brassica nigra*), Italian thistle (*Carduus pycnocephalus*), and red stemmed filaree *(Erodium cicutarium*). Although the survey occurred relatively early in the growing season, the plants were growing densely and appeared robust in health and vigor, with heights ranging from 12 to 16 inches.

Urban-Suburban

Urban-suburban land cover on the parcels consists of a residential home, an accompanying detached garage, and a paved driveway.

Rare Plant Habitat Assessment

The rare plant habitat assessment was conducted to determine whether the parcels could contain serpentine soils or land cover types, and whether the habitat present was of sufficient quality to support VHP-covered rare plants. The soil mapped on the parcels is not a serpentine soil type, and the plant ecologist observed no indicators on site that were consistent with nearby off-site serpentine soils. Additionally, plants that are considered serpentine indicator species (Safford et al. 2005), including perennial bunchgrasses such as needlegrass (*Stipa* sp.) and one sided bluegrass (*Poa secunda*) observed in the known serpentine area, were absent from the study parcels. Lastly, historical aerial imagery (NETR 2018) shows that between 1948 and 1968 these parcels were actively used for agriculture. It is very unlikely that any VHP-covered rare plants could persist in a management regime of intensive agriculture and soil disturbance.

During the site visit, the plant ecologist assessed nearby areas that exhibit serpentine influence, as a basis for comparison. Grasslands to the northeast of the site (approximately 500 feet from the parcel boundaries) are underlain by a serpentine soil type, Montara-Rock outcrop complex, 30–50% slopes (NRCS 2018). Compared to the parcels, these grasslands were observed to have substantially lower cover and abundance of nonnative grasses. The stature of the vegetation on the off-site serpentine soil was notably shorter than on the study parcels, at less than 6 inches high. In contrast to the study parcels, the serpentine area off site lacked weedy forbs such as Italian thistle and black mustard. In conclusion, serpentine bunchgrass grassland does occur nearby, but does not occur on the study parcels.

According to Chapter 6 of the VHP, under Condition 20, plant surveys could be required for projects that are located within a 0.25-mile radius of a known occurrence of a VHP-covered plant and/or suitable habitat (ICF International 2012). These parcels are located within the 0.25-mile radius around a California Natural Diversity Database (CNDDB) -recorded occurrence of a VHP-covered plant, Santa Clara Valley dudleya (*Dudleya setchellii* ssp. *abramsii*), and the parcels are thus designated by the VHP as plant survey areas. The Santa Clara Valley dudleya record is located approximately 0.10 mile northeast of the parcels (CNDDB 2018). This species grows on serpentine rock outcrops; although there is potentially suitable serpentine rock outcrop habitat for this

species within 0.25 mile of the parcels, no rock outcrops occur on the parcels themselves. Thus, it is highly unlikely that this occurrence extends into the parcel boundaries.

As outlined above, VHP-covered plants have a very low likelihood of occurring on the parcels. The habitat on the parcels is not suitable for these species, and no evidence of serpentine influence was observed. Land cover types mapped on the parcels (California annual grassland and urban/suburban) are not land cover types that require rare plant surveys under Conditions 19 or 20 of the VHP. Although the parcels are within 0.25 mile of a CNDDB occurrence record of Santa Clara Valley dudleya, the specific habitat requirements (serpentine rock outcrops) or other serpentine-influenced habitat types do not occur on the study parcels. Additionally, the parcels have a history of agricultural use, and their disturbed nature further limits the potential for VHP-covered rare plant species to occur. For these reasons, it is our professional opinion that VHP-covered rare plant surveys would not be required for these parcels.

If you have any questions regarding the results of our rare plant habitat assessment, please contact me by email at ealford@harveyecology.com or by phone at 408.458.3221.

Sincerely,

Élan Alford, Ph.D.
Project Manager, Senior Plant Ecologist

References

[CNDDB] California Natural Diversity Database. 2018. Rarefind 5.0. California Department of Fish and Wildlife. <https://www.wildlife.ca.gov/Data/CNDDB>. Accessed February 2018.

ICF International. 2012. Final Santa Clara Valley Habitat Plan. August. San Francisco, California. Prepared for City of Gilroy, City of Morgan Hill, City of San José, County of Santa Clara, Santa Clara Valley Transportation Authority, and Santa Clara Valley Water District.

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[NETR] Nationwide Environmental Title Research. 2018. NETR Online Historical Aerials. <http://www.historicaerials.com/>. Accessed February 2018.

[NRCS] Natural Resources Conservation Service. 2018. Web Soil Survey. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed February 2018.

Safford, H. D., J. H. Viers, and S. P. Harrison. 2005. Serpentine endemism in the California flora: a database of serpentine affinity. Madroño 52(4):222–257.