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July 23, 2021

Jennifer Guetschow  
County of San Luis Obispo Planning and Building Department  
976 Osos Street, Room 300  
San Luis Obispo, CA 93408

RE: Dana Reserve Tract Map with Conditional Use Permit (SUB 2020-00047) and General Plan Amendment (LRP2020-00007) Scoping Documents

*Transmitted via email: jguetschow@co.slo.ca.us*

Dear Ms. Guetschow,

The San Luis Obispo Chapter of the California Native Plant Society focuses on the protection of and education about native plant species and their natural habitats in San Luis Obispo County and portions of northern Santa Barbara County. We have reviewed the Notice of Preparation and Initial Study for the Dana Reserve development, proposed for the site known as Canada Ranch in Nipomo. This development contemplates a total of 1,270 new residential units on a 280-acre site outside the Urban Reserve Line in the Nipomo Mesa area. A General Plan Amendment would be required to expand the Urban Reserve Line. Land uses would be changed from Residential Rural to Residential Single Family, Recreation, Residential Multi-Family and Commercial. The developer proposes to dedicate 388 acres offsite as permanent open space to mitigate for impacts. We understand that a Specific Plan is required to adjust the Urban Reserve Line to include the site, and that annexation to the Nipomo CSD is being proposed. A Conditional Use Permit is required under the County Oak Ordinance to remove the oaks as proposed.

CNPS has also reviewed selected portions of the application materials for this project, made available on the County's website, including the Initial Study, Biological Constraints Analysis Report prepared by Althouse and Meade (dated August 2018), and the updated Biological Report dated May, 2021 (hereafter 2021 Report). Thank you for making these reports available to us.

On June 17, 2021, our conservation team was given the opportunity to visit the site. We spent approximately 2 hours on site. We are thankful for the opportunity to visit the site. We have also examined historical aerial photographs and reviewed other information for the project. Based on our review of the project materials and knowledge of the site and the region, we offer the following comments and suggestions. Note that any photographs of the site that we have attached were taken from public roads offsite.

**1. Reduced Project Must be Evaluated**

CNPS would like to register its strong opposition to this project as currently proposed, and **we repeat our request of April 2, 2021 (letter to Board of Supervisors) that a much-reduced alternative to the project be brought forth for co-equal evaluation with the proposed project.** CNPS recognizes that San Luis Obispo County has a housing shortage. However, the

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community of Nipomo should not be expected to bear the brunt of what is a County-wide problem. Therefore, we suggest consideration of a reduced alternative project, for the following primary reasons:

- a) The project threatens thousands (3,430 to be removed according to the 2021 Report) of mature coast live oak trees on a unique dune habitat with destruction, making a mockery of the County's Native Tree Protection Ordinance. The EIR should evaluate the loss and the manner in which any loss is mitigated. As this is some of the last remaining contiguous oak woodlands on the Mesa, the cumulative impact of its destruction should be addressed.
- b) The project puts forth a false mitigation of street tree plantings and off-site conservation of a wooded property (referred to as Dana Ridge), located in an entirely different watershed and ecosystem some several miles away. The EIR should evaluate mitigation in comparison with the imposed mitigation for the adjacent Willow Road project and the intent of the Oak Tree Ordinance, evaluate the proponents proposed mitigation against commonly applied mitigation standards, and evaluate the ecological equivalence of street trees vs. natural habitat. The problems of using coast live oak as a street tree, particularly in regard to natural limb spreading and constant leaf fall should be evaluated in terms of practicality, and also in terms of long-term management goals over the centuries-long life of an oak. As it is possible to redesign this project to minimize loss of oaks through project redesign such as clustering and increased density in a reduced area, such possible reconfigurations should be discussed in the EIR.
- c) The project would significantly impact hundreds of acres of recovering Burton Mesa Maritime Chaparral on site, including several rare and/or special status plants. This natural community is one of the rarest in San Luis Obispo County and is rapidly decreasing on the Nipomo Mesa. The EIR should evaluate losses to this habitat and discuss mitigation.
- d) The project contrasts significantly from surrounding rural residential development. Changing the General Plan to accommodate a massive upzoning should be evaluated in regard to neighborhood concerns.
- e) The project is inconsistent with several County policies, including the current land use designation of Residential Rural; the South County Area Plan recommendation that the oak woodlands on site be *evaluated for preservation*, and the County Land Use Ordinance which includes *as a first priority* in type of uses: "open space uses within the oak woodlands." The EIR should discuss all inconsistencies of this project with the current General Plan.
- f) The project will severely strain the water resources of the Nipomo community (including imported water and groundwater), which in turn demands a full accounting of water need for the entire Nipomo community, not just the Dana Reserve project. The project should analyze both the input provided by the project proponent, input from Nipomo CSD, and the implications of a falling Key Well Index in the light of expected changes in annual rainfall. Input from other significant water users should also be included in the analysis.
- g) The cumulative impacts on water demand from this and other foreseeable projects on the wetlands of Black Lake Canyon and Black Lake would be significant and must be

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evaluated, particularly because those resources have already been severely impacted by lowered water tables. This should be addressed in the EIR.

San Luis Obispo County does not need to trade its unique, irreplaceable and valuable natural resources for the development of housing. The above issues and recommendations for the EIR are discussed further below.

## **2. Environmental Setting**

“Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed in the EIR on environmental resources that are rare or unique to that region and would be affected by the project.” CEQA Guidelines 15125 (c). The proposed project is located on the Nipomo Mesa, part of the dune sheet of the Callendar complex (Cooper, 1967). These dunes contain “Nipomo Mesa” maritime chaparral that has affinities to the rare and sensitive natural community called Burton Mesa chaparral in Santa Barbara County (Davis, Hickson, and Odion 1988), and the Fort Ord sand hills in Monterey County (Griffin, 1978). This is one of the last remaining areas of its type on Nipomo Mesa and in San Luis Obispo County. Due to its unique sand dune nature, there are floral displays that occur adjacent to Highway 101, and the site has provided springtime displays for commuters for years. The County’s Land Use Standards reflect this, as specialized botanical and/or biological studies are required in areas of the Mesa (e.g., Porter Pacific, Green Canyon, and Summit Station areas to name a few) and make specific mention of maritime chaparral. See Section 22.98.070 H (3)f, 22.98.070 H (11)a, and 22.98.070 H (9)e Of the County Land Use Ordinance.

Furthermore, the 4-mile long Black Lake Canyon, located on the Mesa within 2 miles of this project, plays an important part in the greater Nipomo-Guadalupe Dunes Ecosystem due to its hydrologic influence and as an important habitat migration corridor. These resources are unique to this area and must be addressed adequately in the EIR.

## **3. Impact Analysis**

### **a. Visual Concerns**

The project site is visible from Highway 101, Thompson Road, and Dana Foothill Road. Views of the project site from these vantage points should be addressed in the EIR. The impacts of losing one of the last remaining pieces of open space between Santa Maria and Pismo Beach should be evaluated in the EIR.

### **b. Biological Resources**

*Loss of Oak Trees.* This project proposes to remove over 3,000 mature oak trees on the site, covering approximately 100 acres (2021 Report). This is undoubtedly one of the most significant such clearing efforts in recent County history; certainly the largest that is seeking County sanction. We do not know the age or size ranges of the oaks on site, but a cursory inspection shows considerable variation in both. We understand that some cutting was done years ago for livestock feed and for firewood or charcoal, and the trees then re-grew with multiple trunks. This

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seems to be the case for many but by no means all of the oaks on site. A site history would be helpful in understanding the character and richness of this important area of Nipomo Mesa. We note the Specific Plan (page 3-3) indicates that the site continues to be managed for grazing.

**Please provide the site history with regard to grazing in the EIR (numbers and types) and indicate the most recent grazing activity on site. “In recent decades” is not specific enough.**

The project sponsor also announced in a public presentation that, while the project would "impact oaks," it was planned to plant some 1,500 coast live oaks as street trees. This seemed to imply that such planting was suitable as mitigation. CNPS rejects this implication, as it is more than just trees that would be destroyed; it would be an entire, functioning habitat. Please refer to Exhibit A to see the potential contrast between existing site trees and proposed mitigation trees planted for a recent development project in San Luis Obispo.

As discussed above, **the project EIR should develop a reasonable mitigation proposal along the model of the mitigation for the Willow Road** extension project of some years ago, with at least the same ratio of mitigation to tree removal (and in similar soils), at a site that can then be dedicated to permanent conservation.

*Loss Of Maritime Chaparral.* Appropriate detail should be provided in the EIR to explain how the boundaries of the vegetation types were decided upon, and how the particular vegetation types and Alliances (e.g., Coast Live Oak Woodland and chamise-black sage chaparral alliances) were chosen, given the presence of characteristic species such as sand mesa manzanita, mesa horkelia, rush rose (*Crocianthemum*, =*Helianthemum scoparium*), and sand almond (see page 44, 51, 52 of 2021 Bio Report) on the site. The updated 2021 Biological Report identifies coast live oak woodlands (117 acres) and chamise-black sage chaparral (36 acres) alliances as the primary natural communities on site (Table 3, 2021 Report). These communities have Global and State rarity ranks of G5/S4 and G4/S4, respectively. CNPS disagrees with this assessment and therefore requests that the EIR evaluate losses to all impacted vegetation types. It is worth noting that oaks are a common component of the maritime chaparral/coastal scrub mosaic, especially the multi-stemmed oaks seen on this site (Davis Hickson and Odion, 1988).

CNPS requests that the following additional issues concerning Maritime Chaparral be addressed in the EIR. Components of Maritime Chaparral habitat are currently present over a large portion of the site. We believe that the *Arctostaphylos (purissima, rudis)* Shrubland Special Stands (CDFW, 2020), also known as Burton Mesa Chaparral, or a form thereof, are present on site. This is one of the rarest natural communities known in San Luis Obispo County and has a Global rarity ranking of G1 indicating there are less than 6 viable occurrences worldwide and a State rarity ranking of S1, indicating there are less than 6 viable occurrences statewide. These stands are characterized by the presence of sand mesa manzanita (*Arctostaphylos rudis*) in the shrub canopy, along with several other species (Sawyer Keeler-Wolf and Evens, 2009). Page 18 of the initial constraints analysis (and pg. 44 of the 2021 Report) indicates that sand mesa manzanita “is known to occur on sandy soils in maritime chaparral and coastal scrub habitats...” Page 20 of the report (pg. 52 in 2021 Report) also indicates that sand almond occurs in maritime chaparral and coastal dune scrub. Table 1 below presents 2021 observations from 3 locations on the Dana Reserve site relative to the characteristic species of this alliance, in addition to those seen last year in the maritime chaparral at Nipomo Regional Park. Maritime chaparral is further defined

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and characterized by Vasey et al., (2014), and sand mesa manzanita, among other species noted on the site, is included in the maritime climate zone. A Price Canyon variant of Maritime Chaparral is described in the Price Canyon Planning Area EIR (LFR, 2008, now ARCADIS, in the Price Canyon General Plan Update).

Table 1. Characteristic Species of Maritime Chaparral Noted in 3 areas of the Project Site. (Special Status species in **Bold**.)

Alliance Defining Species (per Sawyer Keeler-Wolf and Evens 2009)	Dana, Site 5 (6-17-21)	Dana, Site 6 (6-17-21)	Dana, Site 7 (6-17-21)	Nipomo Park (7-28- 20)
<i>GPS (degrees)</i>	Lat 35.049634 Long -120.501634	Lat 35.045667 Long -120.507005	Lat 35.043953 Long -120.501764	
Deerweed <i>Acmispon glaber (Lotus scoparius)</i>	x	x	x	x
<b>Sand mesa manzanita</b> <b><i>Arctostaphylos rudis</i></b>	<b>x</b>	<b>x</b>	<b>x</b>	<b>x</b>
Chamise <i>Adenostoma fasciculatum</i>	x	x	x	x
California sagebrush <i>Artemisia californica</i>	x	x	x	x
Coyotebrush <i>Baccharis pilularis</i>		x		x
<b>Lompoc Ceanothus</b> <b><i>Ceanothus cuneatus var. fascicularis</i></b>	<b>x</b>			
<b>Nipomo Mesa Ceanothus</b> <b><i>Ceanothus impressus var. nipomensis</i></b>	<b>x</b>			
Bush monkeyflower <i>Diplacus aurantiacus</i>	x	x	x	x
Mock heather <i>Ericameria ericoides</i>		x		x
Rush-rose <i>Helianthemum (Crocianthemum) scoparium</i>	x	x	x	x
Black sage <i>Salvia mellifera</i>		x		x

These data show that the site, at these specific areas and beyond, based on our observations and analysis, contains the characteristic species of what can be called Burton Mesa Chaparral, or the *Arctostaphylos (purissima, rudis) Shrubland Special Stands*. We also call your attention to a 1994 aerial photograph from GoogleEarth (Exhibit B, Figure 1, attached) wherein the majority of the site can be seen to contain a dense shrub cover intermixed with the oaks on site. The aerial

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signature of this site can be seen to be the same as that of Nipomo Regional Park, which also contains maritime chaparral (Exhibit B, Figure 2). **We request that the EIR thoroughly address the history of the site and assess the present vegetation in light of the current and historical presence of the species listed above on the project site.** CEQA (Section 15125) requires an adequate description of baseline environmental conditions present on the site at the time the NOP is published. The above species are present on site now (See 2021 Report, Table 6) and are characteristic species of the Special Stands identified above, per Sawyer, Keeler-Wolf and Evens (2009). **This must be addressed in the EIR.**

The Nipomo Native Garden, located in the immediate area of the site, refers to Central Maritime Chaparral on its website and also refers to many of the same species found on this site. As noted by its name, this “Nipomo Mesa” maritime chaparral has affinities to the rare and sensitive natural community called Burton Mesa chaparral in Santa Barbara County (Davis, Hickson, and Odion 1988), and the Fort Ord sand hills in Monterey County (Griffin, 1978). It appears to fit best into “Coastal Sand-plains and Stabilized Dunes” recognized by Hoover (1970), which he says is “most extensively developed on Nipomo Mesa.”

The County’s website (CSS portal, Assessor’s Parcel 091-301-073) indicates at least two code enforcement cases based on reports of brush-clearing on the site, one as recently as 2017. The effects of past vegetation management and type conversion of habitat, and the observed natural regeneration of habitat at the site should be examined in terms of evaluating the ecological future of the parcel under different development scenarios.

Impacts identified in the 2021 biological report include the loss of 99 acres of oak woodland and 35 acres of chamise-black sage chaparral, with 18 acres of oak woodland preserved on site. Again, CNPS believes this is an inaccurate characterization of the site vegetation and that an unknown amount of maritime chaparral would be lost as a result of the project.

**The EIR consultant needs to contact CDFW VegCamp staff and identify accepted methods (e.g., CNPS Rapid Assessment protocol) to clarify the existence (or lack thereof) of sensitive natural communities onsite, specifically maritime chaparral.** In addition, we believe this project needs to be completely revamped given the rare plants, rare natural communities, and oak woodlands constraints that are present on the site.

*Loss of Habitat for eight Special Status plant species.* The April 2021 Specific Plan on page 3-4 indicates that “on-site habitat on DRSP occupied by sensitive species will be placed in protected easements. Appropriate off-site habitat will be preserved and/or restored to mitigate for impacts to rare plant species.” **This off-site habitat for mitigation of rare plant species needs to be identified in the EIR.** It is not likely that the proposed Tematatte Ridge off-site mitigation area will be an ecologically appropriate location for these plant species with habitat preference for sandy soils of the dune ecosystem.

*Biological Mitigation Proposal.* The applicant proposes to dedicate roughly 388 acres outside the property on which the project would be constructed as permanent open space to mitigate (compensate) for impacts to biological impacts (oak woodlands and chamise-black sage chaparral). The site is located in the upper reaches of Los Berros Canyon, and is only accessible

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via unpaved roads. Ninety-nine percent of the site (shown on Figure 1 of Appendix F of the 2021 Report and Exhibit 3-2 of the April 2021 Specific Plan) is not even visible from Nipomo<sup>1</sup>. The California Native Plant Society does not recognize offsite compensation as mitigation; rather, the Society fully endorses only avoiding the impact (See Appendix A to CNPS Policy on Mitigation Guidelines, 1998). Note that this CNPS Policy does not appear to be characterized correctly in the 2021 Biological Report on pg. 19. First, the 2021 Report references CNPS 2001, and there is no CNPS Mitigation Policy dated 2001. (The link in the references goes to the 1998 Policy.) Secondly, it ignores the Appendix to the Policy which states the above position of endorsing avoidance. Our concerns regarding the proposed off-site mitigation are as follows:

- The mitigation site does not contain the maritime chaparral community that is being impacted by the project; thus it is not “like for like;”
- The mitigation site does not contain the one characteristic species, *Arctostaphylos rudis*, and several other characteristic and/or special status species, that make up the on-site maritime chaparral habitat;
- The mitigation site is in an entirely different watershed from the proposed project site;
- The resources present on the mitigation site are not threatened (the land is zoned Agriculture);
- The mitigation does not compensate for the loss of over 3,000 mature coast live oak trees, nor for the loss of maritime chaparral.

**We reiterate that a reduced alternative that avoids the significant impacts to oaks and adjacent habitat must be addressed in the EIR.**

**c. Land Use and Planning (Policy Inconsistency)**

The Initial Study indicates that the EIR will contain a detailed analysis of project consistency with applicable land use plans. We offer the following to be addressed:

**The *Conservation and Open Space Element*** identifies "Major Issues" for Biological Resources on pg. 3.5:

- “1) Integrated management approach. Increasing risk of degradation and/or elimination of natural resources requires coordinated and integrated management of the county’s biological resources by public, private, nonprofit, and agricultural organizations at ecosystem and site-specific levels.
- 2) Land use conversion. Changing land uses, particularly conversion of agricultural and rural lands to residential and urban uses, adversely impact species and their habitats.
- 3) Wildlife protection. Changing land uses impact wildlife movement corridors and displaces wildlife.

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<sup>1</sup> Note that the map of the Mitigation site presented at the July 19 scoping meeting and in the Initial Study (Figure 1) is different from that shown in these documents. This needs to be clarified. It appears that Fig. 1 in the Initial Study is incorrect.



- 4) Oak woodlands. Areas of oak woodlands and native trees are diminishing due to tree cutting, urban land conversion and displacement by exotic/non native species.”

The proposed project clearly produces a further aggravation of these issues, and this should be addressed in the EIR. The environmental review must examine impacts under these 'Major Issues.'

**Section 4.5 of the *South County Area Plan*** (Rural Area Land Use, pg. V.4-17) states the following with regard to the Canada Ranch:

“...The property has a large oak woodland that should be evaluated for preservation as a long-term habitat...A specific plan should be accompanied by market feasibility and fiscal impact studies and an environmental impact report **to determine the logical extent and location of development.**”

This implies the EIR is intended to help determine the extent and location of development, and points to the importance of a careful and detailed alternatives analysis in the EIR.

**Section 22.58.010 of the *County Land Use Ordinance*** identifies the purpose and intent of the County’s Oak Woodland Ordinance as follows:

“The intent of this ordinance is to maintain the character of the existing landscape and promote oak woodland management independent of regulation.”

Note this says “maintain the character of the existing landscape...” It was not intended to allow for wholesale destruction of oak woodlands just by virtue of requiring a Conditional Use Permit.

**Section 22.98.070 South County Sub-Area Standards, Subsection D**, regarding Open Space preservation, has a cluster subdivision incentive. We note that the County’s “info-hold” letter dated July 24, 2020 indicated that “the map is not compliant with 86% of existing oaks to be removed.” The letter goes on to suggest that a cluster design that would reduce these impacts should be considered. **We agree and suggest this be included in the Alternatives analysis of the EIR.**

**Section 22.98.072.H (8) of the *County Land Use Ordinance*** (Canada Ranch) includes as a first priority in type of uses: “open space uses within the oak woodlands.” This section of the LUO also calls for:

“Oak Habitat Preservation. Designation of the existing oak forest habitat for open space preservation, where limited recreational and open space uses may be allowed.”

As noted above, the project proposed to remove 3,430 oak trees and retain 516 (14% of the existing trees). According to the 2021 Report, 99 acres of coast live oak woodland habitat would be removed. This is wholly inconsistent with this policy. Preserving an isolated 388-acre parcel that is inaccessible to the public as mitigation for the loss of oak woodland and chaparral does not meet the intent of this policy.

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In light of the above policy inconsistencies, the EIR must consider alternatives that avoid the inconsistencies and avoid and reduce the significance of these impacts.

#### **d. Utilities and Service Systems (Water Resources)**

The project site lies within the Nipomo Mesa Management Area (NMMA) of the Santa Maria Groundwater Basin, which has been subject to litigation for years. The availability of water resources will require critical analysis in the EIR, particularly in the expectation of continued drought conditions due to climate change and made evident in current literature.

According to the IS, the total estimated water demand at full buildout is estimated at 336.25 AFY, with a 10% contingency estimated at 369.88 AFY. While the developer argues that it can use as-yet-unallocated water from the Nipomo CSD water imports under the Stipulation and Judgment for the Santa Maria Groundwater Litigation (*Santa Maria Valley Water Conservation District vs. City of Santa Maria, et al.* Superior Court for the County of Santa Clara Case No. 770214), there is no evidence yet presented on the impacts of the water supply and future development on the entire Santa Maria Groundwater Basin. The Stipulation referred to above requires the determination of water shortage condition in the NMMA using the Key Wells Index as criteria as part of the Annual Report. According to the 2020 Annual Report, the Key Wells Index indicated severe water shortage conditions. The import of water through the NCSO pipeline was in part to offset overdraft within that basin, and as the Stipulation does not apply to, or limit, the pumping of overlying property owners such as agriculturalists on the Mesa, the cumulative impacts must be analyzed in the EIR.

Regarding anticipated water supply deficiencies, the County Resource Summary Report of 2016-2018 recommends a Level of Severity III for the Nipomo Mesa portion of the groundwater basin (San Luis Obispo County, 2018).

Black Lake Canyon is a significant ecological resource on the Nipomo Mesa. It provides wetland habitat for two plants listed as Endangered under the Federal ESA, in addition to a number of other wetland-dependent species. These plants are narrow endemics and require water-saturated dune sands as habitat. A study in 1994 (Chipping 1994) showed that the water table in the Black Lake Canyon area is variable, but the wetlands in the lower canyon are drying up. Further degradation of the lower canyon wetlands has the potential to threaten the habitat of each of these plants. The relation of the lower canyon waters to those of the regional aquifer must be addressed and the cumulative impacts on the hydrology and wetlands of Black Lake Canyon and Black Lake should be evaluated in the EIR.

In light of the above situation, **the environmental analysis should include discussion and analysis of the NMMA Key Wells Index and the observations and conclusions of the Nipomo Mesa Management Area 13th Annual Report, Calendar Year 2020 (NMMA Technical Group, 2021).**

#### **4. Alternatives**

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An EIR must describe a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain **most of** the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project, CEQA Guidelines Section 15126.6(a), (f). The proposed project would potentially affect 99 acres of sensitive oak woodland and maritime chaparral habitat, in addition to several special status plant and animal species. The EIR must identify an alternative that avoids these impacts.

**CNPS SLO requests that a much-reduced alternative be evaluated that preserves the majority of the oak trees and maritime chaparral on site and that this alternative be evaluated co-equally with the proposed project.** At a minimum, the EIR should evaluate the following alternatives:

- No project alternative;
- Allowable buildout under the General Plan;
- A clustered development alternative;
- A reduced density alternative;
- Alternative locations for the neighborhoods that reduce their size and impacts to sensitive resources, specifically oak woodlands and maritime chaparral.

Alternative project designs should be evaluated in consideration of the 'Major Issues' for Biological Resources as listed in the County's Open Space and Conservation Element, as discussed above.

We appreciate the County's careful consideration of our concerns in this process. Please include our organization on the list of interested parties for any future notices related to the project. Again, CNPS recognizes that the County has a housing shortage. We do not believe, however, that the County's unique and irreplaceable natural resources need to be sacrificed in order to make progress toward the goal of additional housing. Otherwise, what is the point of living here vs. living in downtown Los Angeles?

Sincerely,

Melissa Mooney

President

San Luis Obispo Chapter, California Native Plant Society

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### References Cited

- CDFW, 2020. California Sensitive Natural Communities. Online version dated Sept. 9, 2020. Accessed June 20, 2021. Available at:  
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline>
- Chipping, D.H. 1994. Black Lake Canyon Geologic and Hydrologic Study. Prepared for the Land Conservancy of San Luis Obispo County. 76 p.
- Cooper, William S. 1967. Coastal Dunes of California. Geological Society of America, Memoir 104.
- Davis, Frank W., D. E. Hickson, and D. Odion. 1988. *Composition of Maritime Chaparral Related to Fire History and Soil, Burton Mesa, Santa Barbara County, California*. Madrono, 35(3) 169-195.
- Elkhorn Slough Coastal Training Program. June 12, 2007. *Defining and Delineating Maritime Chaparral on California's Central Coast*. A workshop sponsored by the Program, the CA Coastal Conservancy, National Oceanic and Atmospheric Association (NOAA), and California Department of Fish and Game.
- Griffin, James R., 1978. *Maritime Chaparral and Endemic Shrubs of the Monterey Bay Region, California*. Madrono, 25(2) 65-112.
- Hoover, Robert F. 1970. The Vascular Plants of San Luis Obispo County, California. U.C. Press.
- Nipomo Mesa Management Area (NMMA) Technical Group. April 2021. Nipomo Mesa Management Area 13<sup>th</sup> Annual Report, Calendar Year 2020. Report submitted to the Court and published to the CA Dept. of Water Resources website.
- San Luis Obispo County, 2018. 2016-2018 Resource Summary Report. Volume 1 of 2 – Findings and Recommendations. San Luis Obispo County General Plan, Public Review Draft.
- Santa Maria Valley Water Conservation District v. City of Santa Maria, et al and Related Cross-Actions and Actions Consolidated For All Purposes, Santa Maria Groundwater Litigation, Lead Case No.1-97-CV-770214. [Judgment]. 2008. The Judgment After Trial was filed on January 25, 2008. The Stipulation is Exhibit 1 to the Judgment entitled "STIPULATION (JUNE 30, 2005 VERSTION)". The appellate case no. in the Sixth Appellate District is H032750 and it was filed on Nov. 21, 2012.
- Sawyer, J.O., Keeler-Wolf, T., and J. Evens. 2009. A Manual of California Vegetation. Second Edition.
- Vasey, Michael C., V. Thomas Parker, Karen D. Holl, Michael E. Loik and Seth Hiatt. 2014. Maritime climate influence on chaparral composition and diversity in coast range of central California. *Ecol Evol.* 4(18): 3662-3674.

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Exhibit A



Photo taken looking southeast from intersection of Hetrick Avenue and Glenhaven Place, east of Calimex Pl. These mature oak trees would be removed for proposed Neighborhood 8.



Photo of a small coast live oak street tree at a recent development in San Luis Obispo.

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Exhibit B



Figure 1. 1994 Aerial photo showing Dana Reserve and dense shrubland on site.



Figure 2. 1994 Aerial photo showing Nipomo Regional Park with similar shrubland aerial signature.

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