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 Anthony Lombardo & Associates, Inc.
 144 W. Gabilan Street
 Salinas CA 93901
 Re: remodel of 1152 Spyglass Hill Road.

June 23,2021

Mr. and Mrs. Balaji and Melanie Yelemanchili propose to significantly remodel their single-family residence at 1152 Spyglass Hill Road in Pebble Beach CA. A - acre parcel on the southwestern portion of the Monterey Peninsula in Monterey County California. It lies within the Monterey quadrangle of the US Geological system. This property is within the jurisdiction of the Del Monte Forest Local Coastal Plan administered by the County of Monterey. The project will entail rebuilding the main level (taking all the walls down to the floor plate) on the same footprint as the previous house, reconfiguring the driveway,



Figure 1: View of West Side of existing house from 17-mile Drive.

the rear (southeastern) end of the courtyard and a "viewing deck," will be added on the roof that will span the structure between the two wings of the building. With the exception of a minor revision of the driveway entry, all this work is to take place on and within the footprint of the current rendition of the house.

The Yelemanchili property lies at the junction of Spyglass Hill and 17-mile Drive near the Southern Terminus of the Asilomar Dunes complex (which extends north to Point Pinos in the City of Pacific Grove) Dune scrub habitat is considered Environmentally sensitive habitat.

On June 10, 2021 I visited the property at 1152 spyglass Hill and walked the entire site from north to south and east to west, taking photographs and taking notes of conditions and what plant or animal species I encountered. Prior to my visit I created a target list of species that may occur on or adjacent to the property by conducting queries of the California Natural Diversity Database (CNDDDB) and the Rare

removing the narrow decks that surround the perimeter of the north and west elevations and replacing them with a more usable, larger deck that projects from the western corner of the building. Additionally, an existing pool in the main courtyard will be removed and replaced with a smaller pool at

Plant Rank Inventory database of the California native plant Society (RPR). Based on the known conditions of the site in Dunes close to the Ocean shore I created a list of 20 Plants (12) Animals (6) and Plant communities (2) that could conceivably be found on or near the property. Plant species include: *Arctostaphylos pumila* (sandmat manzanita), *Astragalus nuttallii* var. *nuttallii* (Nuttall's milkvetch), *Astragalus tener* var. *titi* CE¹, FE² (coastal dunes milk-vetch), *Castilleja latifolia* (Monterey paintbrush), *Chorizanthe pungens* var. *pungens* FT³ (Monterey Spineflower), *Erysimum menziesii* ssp. *menziesii* CE, FE (Menzies wallflower), *Gilia tenuiflora* ssp. *arenaria* CT⁴, FE (Monterey gilia), *Horkelia cuneata* var. *sericea* (Kellogg's Horkelia), *Layia carnosa* CE, FE (beach Layia), *Lupinus tidestromii* CE, FE (Tidestrom's lupine), *Monardella sinuata* ssp. *nigrescens* (northern curly-leaved Monardella), *Phacelia ramosissima* var. *austrolitoralis* (south coast branching phacelia). Animals that may nest or occupy or forage regularly on the property include: *Anniella pulchra* (Northern California legless lizard), *Bombus caliginosus* (Obscure bumblebee), *Bombus occidentalis* CCE⁵ (western bumblebee), *Coelus globosus* (globose dune beetle), and *Euphilotes enoptes smithi* FE (Smith's blue butterfly). Spread sheets of the two database outputs are included in this report and indicate likelihood of whether the species could occur on site and whether they were seen on site.

Early June is typically a good time to survey for special status flowering plants on the Monterey Peninsula (CDFW and USFWS require surveys to be conducted during the typical flowering period of that species for valid presence or absence declarations) All the special status species that do or could occur on or near the Yelemanchili property would be in bloom or fruit at this time in a typical year.

Though heavily impacted by the previous home development and surrounding homes and golf courses, the natural plant community **Dune Scrub** is still present in fragments on and around the property and requires assessment and protection. Historically, this property was likely entirely Dune scrub which may have contained (and still does nearby – directly across the street to the north and uphill to the East and Southeast) several rare, threatened, and endangered plant species including State and Federal Endangered Beach Layia (*Layia carnosa*), State and Federal Endangered Tidestrom's lupine (*Lupinus tidestromii*), Federally threatened Monterey Spineflower (*Chorizanthe pungens* var. *pungens*), and State and Federal Endangered Menzies wallflower (*Erysimum menziesii* ssp. *menziesii*). It also supports dune buckwheat (*Eriogonum parvifolium*) which is a key host plant for the Smith's blue butterfly a federal endangered species. For reference, 3 of the Endangered plant species were identified in Dunes approximately 1/3 mile Southeast and the Threatened Monterey Spineflower was recently identified in dune habitat on the north side of Spyglass Hill Road just across from the Yelemanchili driveway.

The property at 1152 Spyglass Hill is on a dune that slopes gently from East to West from a highpoint of approximately 43-foot elevation on the East boundary to about 37 feet at the west boundary, with a slight rise off the north rise of the residence that matches the main floor. The lower level of the house matches the elevation of the surrounding area on the South and West sides. Minimal landscape around the house includes sheared (sp. unknown) hedges on both sides of the driveway on the north side, and a small stand of *Myoporum laetum* off the SE corner and along the Eastern property line and another off the NW corner,

¹ California ESA Endangered

² Federal ESA Endangered

³ Federal ESA Threatened

⁴ California ESA Threatened

⁵ California ESA Candidate for Endangered list

Several large *Pittosporum* shrubs along the back (East) side of the house and a sea of the nonnative, invasive Ice plant (*Carpobrotus* sp.). The dominant species of the entire property, Ice plant forms very dense mats that have completely buried the native vegetation over nearly half of the site. There are several breaks in the cover of the Ice plant that still host some native species, one due west of the NW corner of the house and another on the south side of the house just off the end of the wrap-around deck. The primary species found in those ice plant openings is False heather (*Ericameria ericoides*) which is a small yellow flowering shrub that is usually a rear dune and Coast scrub species through the Central Coast and is commonly associated with the Northern California legless lizard (*Anniella pulchra*) which often burrows beneath and forages for insect prey in its leaf litter. The Northern California legless lizard is a small slender lizard with no legs, eyelids, a shovel-shaped snout, smooth shiny scales, and a blunt tail, that spends most of its life underground. It is sometimes confused for a snake, but snakes have no eyelids. On close observation the presence of eyelids is apparent when this lizard blinks. Apparently active mostly during the morning and evening when they forage beneath the surface of loose soil or leaf litter which has been warmed by the sun. Legless Lizards have a tolerance of low temperatures which allows activity in cool conditions.

Few other native species were found on the site, though properties on the South and East supported a wider array of typical dune scrub species like dune buckwheat (*Eriogonum parvifolium*), Dune sagewort (*Artemisia pycnocephala*), Sand Verbena (*Abronia umbellata*) Beach evening primrose (*Camissoniopsis cheiranthifolia*) Coast popcorn flower (*Cryptantha leiocarpa*) and Beach bur (*Ambrosia chamissonis*). I did not locate any Rare, Threatened or Endangered species of plant or animal anywhere on the property or directly adjacent to the property.

Figure 2: View looking south from Spyglass Hill Road along property line with easterly neighbor.



The Driveway is going to be redesigned to be a curved half circle that will have ingress and egress to Spyglass Hill Road. It will require some removal of the nonnative hedge plants currently on each side of the existing Drive. This is the only physical change to the property proposed beyond the current existing footprint but is not being done in previously unimpacted conditions with a bare minimum of grading (+/- 25 cubic yards) to reshape the access in and out from Spyglass Hill Road. Based on my observations it appears that this would have no impact to special status (Rare, Threatened, or Endangered) plant or animal species.

It is anticipated that no impacts will occur outside of the current development footprint, but if any new disturbance occurs to the dune areas west, or south of the current pad, the potential for impacts to special status plant species and animal species of special concern like the northern California legless lizard could increase. Despite the dominance of the *Carpobrotus*, the seedbank of native species is still likely intact and native species seen in the openings between the *Carpobrotus* species are typical habitat companions of the listed species in nearby habitat. The photo below (**figure 3**) illustrates the carpet level coverage of the Ice plant on the western portion of the property and the small openings where native species are still present. While there is ample evidence that the northern California legless lizards prefer dune habitat that is dominated by native shrubs, they have been known to utilize less "ideal" habitat that has been invaded by ice plant. The conditions on site are not ideal but do not completely exclude the potential for their presence.



Figure 3: View along south side of existing house looking east.

RBHC

The remodeling of the house at 1152 Spyglass Hill Road is planned to create no new impacts to the surrounding existing landscape of the property and be done entirely on top of the original foundation and lower floor of the house. If implemented as proposed, the remodel project will have no significant impact to special status animals, plants, or plant communities.

Please let me know if you have any questions.

Pat Regan

Plant list observed on and adjacent to 1152 Spyglass Hill Road.

Abronia latifolia

Abronia umbellata

Ambrosia chamissonis

Artemisia californica

Artemisia pycnocephala

Armeria maritima

Baccharis pilularis

Camissonia cheiranthifolia

Cardionema ramosissimum

*Carpobrotus edulis**

Cryptantha leiocarpa

Ericameria ericoides

Erigeron glaucus

Eriogonum parvifolium

Eschscholzia californica var. *maritima*

Lessingia filaginifolia

Lotus scoparius

*Myoporum laetum**

*Pittosporum crassifolium**

Poa douglasii

Polygonum paronychia

* = nonnative

Appendices

CNPS Rare Plant inventory result for Monterey Quadrangle

CNDDDB result for Monterey Quadrangle.



Figure 5: View looking South across SW portion of property at dense ice plant cover.

Figure 6: View looking NE over northwestern portion of lot toward driveway entry.





Figure 7: Small patch of native False heather off Southern side of house

Figure 8: View looking East from southern property line. near monoculture of ice plant.





Figure 9: View along back (east) side of existing house at LP tank enclosure.

Figure 10: View along back east SE corner of house open dune sand and Myoporum shrubs.





Figure 11: View looking east uphill from eastern property line of lot. Typical native Dune habitat at top of slope.

Figure 12: Reverse of view above looking west at back side of house





Figure 13: View looking north at Spyglass Hill Road along easterly property line. Native Dune vegetation on neighbor's property on right.

Figure 14: View looking South into front entrance of Driveway from Spyglass Hill Road.



Rare Plant rank - Special status species in Monterey Quad - Plants in Green could be present in the Asilomar Dunes on or near 1152 Spyglass Hill										
Plants in Red are eliminated from presence by specific habitat or elevaton requirements, Plants in black are unlikely										
Scientific Name	Common Name	Lifeform	CRPR	CESA	FESA	Blooming		Habitat	Elevation -ft.	
						Period			Low	High
Allium hickmanii	Hickman's onion	perennial bulbiferous herb	1B.2	None	None	Mar-May		Closed-cone coniferous forest, Chaparral (maritime), Coastal prairie, Coastal scrub, Valley and foothill grassland	15	655
Arctostaphylos hookeri ssp. hookeri	Hooker's manzanita	perennial evergreen shrub	1B.2	None	None	Jan-Jun		Closed-cone coniferous forest, Chaparral, Cismontane woodland, Coastal scrub	195	1760
Arctostaphylos montereyensis	Toro manzanita	perennial evergreen shrub	1B.2	None	None	Feb-Mar		Chaparral (maritime), Cismontane woodland, Coastal scrub	95	2395
Arctostaphylos pajaroensis	Pajaro manzanita	perennial evergreen shrub	1B.1	None	None	Dec-Mar		Chaparral (sandy)	95	2495
Arctostaphylos pumila	sandmat manzanita	perennial evergreen shrub	1B.2	None	None	Feb-May		Closed-cone coniferous forest, Chaparral (maritime), Cismontane woodland, Coastal dunes , Coastal scrub	5	675
Astragalus nuttallii var. nuttallii	ocean bluff milk-vetch	perennial herb	4.2	None	None	Jan-Nov		Coastal bluff scrub, Coastal dunes	5	395
Astragalus tener var. titi	coastal dunes milk-vetch	annual herb	1B.1	CE	FE	Mar-May		Coastal bluff scrub (sandy), Coastal dunes , Coastal prairie (mesic)	0	165
Castilleja ambigua var. insalutata	pink Johnny-nip	annual herb (hemiparasitic)	1B.1	None	None	May-Aug		Coastal prairie, Coastal scrub	0	330

Castilleja latifolia	Monterey Coast paintbrush	perennial herb (hemiparasitic)	4.3	None	None	Feb-Sep	Closed-cone coniferous forest, Cismontane woodland (openings), Coastal dunes, Coastal scrub	0	605
Ceanothus rigidus	Monterey ceanothus	perennial evergreen shrub	4.2	None	None	Feb-Apr(Jun)	Closed-cone coniferous forest, Chaparral, Coastal scrub	5	1805
Chorizanthe douglasii	Douglas' spineflower	annual herb	4.3	None	None	Apr-Jul	Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Valley and foothill grassland	180	5250
Chorizanthe pungens var. pungens	Monterey spineflower	annual herb	1B.2	None	FT	Apr-Jun(Jul)	Chaparral (maritime), Cismontane woodland, Coastal dunes, Coastal scrub , Valley and foothill grassland	5	1475
Clarkia jolonensis	Jolon clarkia	annual herb	1B.2	None	None	Apr-Jun	Chaparral, Cismontane woodland, Coastal scrub, Riparian woodland	65	2165
Clarkia lewisii	Lewis' clarkia	annual herb	4.3	None	None	May-Jul	Broadleaved upland forest, Closed-cone coniferous forest, Chaparral, Cismontane woodland, Coastal scrub	95	3920
Collinsia multicolor	San Francisco collinsia	annual herb	1B.2	None	None	(Feb)Mar-M	Closed-cone coniferous forest, Coastal scrub	95	820
Cordylanthus rigidus ssp. littoralis	seaside bird's-beak	annual herb (hemiparasitic)	1B.1	CE	None	Apr-Oct	Closed-cone coniferous forest, Chaparral (maritime), Cismontane woodland, Coastal dunes , Coastal scrub	0	1690
Corethrogyne leucophylla	branching beach aster	perennial herb	3.2	None	None	May,Jul,Aug	Closed-cone coniferous forest, Coastal dunes	5	195

Delphinium hutchinsoniae	Hutchinson's larkspur	perennial herb	1B.2	None	None	Mar-Jun	Broadleaved upland forest, Chaparral, Coastal prairie, Coastal scrub	0	1400
Ericameria fasciculata	Eastwood's goldenbush	perennial evergreen shrub	1B.1	None	None	Jul-Oct	Closed-cone coniferous forest, Chaparral (maritime), Coastal dunes, Coastal scrub	95	900
Erysimum menziesii	Menzies wallflower	perennial herb	1B.1	CE	FE	Mar-Sep	Coastal dunes	0	115
Fritillaria liliacea	fragrant fritillary	perennial bulbiferous herb	1B.2	None	None	Feb-Apr	Cismontane woodland, Coastal prairie, Coastal scrub, Valley and foothill grassland	5	1345
Gilia tenuiflora ssp. arenaria	Monterey gilia	annual herb	1B.2	CT	FE	Apr-Jun	Chaparral (maritime), Cismontane woodland, Coastal dunes, Coastal scrub	0	150
Grindelia hirsutula var. maritima	San Francisco gumplant	perennial herb	3.2	None	None	Jun-Sep	Coastal bluff scrub, Coastal scrub, Valley and foothill grassland	45	1310
Horkelia cuneata var. sericea	Kellogg's horkelia	perennial herb	1B.1	None	None	Apr-Sep	Closed-cone coniferous forest, Chaparral (maritime), Coastal dunes, Coastal scrub	30	655
Iris longipetala	coast iris	perennial rhizomatous herb	4.2	None	None	Mar-May	Coastal prairie, Lower montane coniferous forest, Meadows and seeps	0	1970
Layia carnosa	beach layia	annual herb	1B.1	CE	FE	Mar-Jul	Coastal dunes, Coastal scrub (sandy)	0	195
Lomatium parvifolium	small-leaved lomatium	perennial herb	4.2	None	None	Jan-Jun	Closed-cone coniferous forest, Chaparral, Coastal scrub, Riparian woodland	65	2295
Lupinus tidestromii	Tidestrom's lupine	perennial rhizomatous herb	1B.1	CE	FE	Apr-Jun	Coastal dunes	0	330
Malacothamnus palmeri var. involucratus	Carmel Valley bush-mallow	perennial deciduous shrub	1B.2	None	None	Apr-Oct	Chaparral, Cismontane woodland, Coastal scrub	95	3610

Malacothamnus palmeri var. palmeri	Santa Lucia bush-mallow	perennial deciduous shrub	1B.2	None	None	May-Jul	Chaparral (rocky)	195	1180
Microseris paludosa	marsh microseris	perennial herb	1B.2	None	None	Apr-Jun(Jul)	Closed-cone coniferous forest, Cismontane woodland, Coastal scrub, Valley and foothill grassland	15	1165
Monardella sinuata ssp. nigrescens	northern curly-leaved monardella	annual herb	1B.2	None	None	(Apr)May-Jul	Chaparral (SCR Co.), Coastal dunes, Coastal scrub, Lower montane coniferous forest (SCR Co., ponderosa pine sandhills)	0	985
Monolopia gracilens	woodland woollythreads	annual herb	1B.2	None	None	(Feb)Mar-Jul	Broadleaved upland forest (openings), Chaparral (openings), Cismontane woodland, North Coast coniferous forest (openings), Valley and foothill grassland	325	3935
Phacelia ramosissima var. austrolitoralis	south coast branching phacelia	perennial herb	3.2	None	None	Mar-Aug	Chaparral, Coastal dunes, Coastal scrub, Marshes and swamps (coastal salt)	15	985
Piperia michaelii	Michael's rein orchid	perennial herb	4.2	None	None	Apr-Aug	Coastal bluff scrub, Closed-cone coniferous forest, Chaparral, Cismontane woodland, Coastal scrub, Lower montane coniferous forest	5	3000
Piperia yadonii	Yadon's rein orchid	perennial herb	1B.1	None	FE	(Feb)May-A	Coastal bluff scrub, Closed-cone coniferous forest, Chaparral (maritime)	30	2475

Potentilla hickmanii	Hickman's cinquefoil	perennial herb	1B.1	CE	FE	Apr-Aug	Coastal bluff scrub, Closed-cone coniferous forest, Meadows and seeps (vernally mesic), Marshes and swamps (freshwater)	30	490
Rosa pinetorum	pine rose	perennial shrub	1B.2	None	None	May,Jul	Closed-cone coniferous forest, Cismontane woodland	5	3100
Sidalcea malachroides	maple-leaved checkerbloom	perennial herb	4.2	None	None	(Mar)Apr-Aug	Broadleaved upland forest, Coastal prairie, Coastal scrub, North Coast coniferous forest, Riparian woodland	0	2395
Trifolium hydrophilum	saline clover	annual herb	1B.2	None	None	Apr-Jun	Marshes and swamps, Valley and foothill grassland (mesic, alkaline), Vernal pools	0	985
Trifolium polyodon	Pacific Grove clover	annual herb	1B.1	CR	None	Apr-Jun(Jul)	Closed-cone coniferous forest, Coastal prairie, Meadows and seeps, Valley and foothill grassland	15	1395
Trifolium trichocalyx	Monterey clover	annual herb	1B.1	CE	FE	Apr-Jun	Closed-cone coniferous forest (sandy, openings, burned areas)	95	1000

CNDDDB output for Monterey Quadrangle - 1145 Spyglass Hill Road - most likely species to occur on site in red text

Scientific_Name	Common_Name	Federal Status	State Status	CDFW Status	Rare Plant	potential onsite?
Amphibians						
Ambystoma californiense	California tiger salamander	FT	CT	WL	-	No
Rana boylei	foothill yellow-legged frog	None	CE	SSC	-	No
Rana draytonii	California red-legged frog	FT	None	SSC	-	No
Taricha torosa	Coast Range newt	None	None	SSC	-	No
Birds						
Athene cunicularia	burrowing owl	None	None	SSC	-	No
Charadrius nivosus nivosus	western snowy plover	FT	None	SSC	-	No
Coturnicops noveboracensis	yellow rail	None	None	SSC	-	No
Cypseloides niger	black swift	None	None	SSC	-	No
Laterallus jamaicensis coturniculus	California black rail	None	CT	FP	-	No
Pelecanus occidentalis californicus	California brown pelican	None	None	FP	-	No
Fish						
Oncorhynchus mykiss irideus pop. 9	steelhead - south-central California coast DPS	FT	None	-	-	No
Insects						
Bombus caliginosus	obscure bumble bee	None	None	-	-	unlikely*
Bombus occidentalis	western bumble bee	None	Ccand.	-	-	unlikely
Coelus globosus	globose dune beetle	None	None	-	-	Yes
Danaus plexippus pop. 1	monarch - California overwintering population	None	None	-	-	No
Euphilotes enoptes smithi	Smith's blue butterfly	FE	None	-	-	No
Eumetopias jubatus	Steller (=northern) sea-lion	None	None	-	-	No
Mammals						
Lasiurus cinereus	hoary bat	None	None	-	-	No
Sorex ornatus salarius	Monterey shrew	None	None	SSC	-	No
Reptiles						
Anniella pulchra	Northern California legless lizard	None	None	SSC	-	Yes
Emys marmorata	western pond turtle	None	None	SSC	-	No
Community - Terrestrial						
Central Dune Scrub	Central Dune Scrub	None	None	-	-	Yes
Central Maritime Chaparral	Central Maritime Chaparral	None	None	-	-	No
Monterey Cypress Forest	Monterey Cypress Forest	None	None	-	-	No

Monterey Pine Forest	Monterey Pine Forest	None	None	-	-	No
Monterey Pygmy Cypress Forest	Monterey Pygmy Cypress Forest	None	None	-	-	No
Northern Bishop Pine Forest	Northern Bishop Pine Forest	None	None	-	-	No
Plants - Lichens						
Bryoria spiralifera	twisted horsehair lichen	None	None	-	1B.1	No
Ramalina thrausta	angel's hair lichen	None	None	-	2B.1	No
Plants - Vascular						
Allium hickmanii	Hickman's onion	None	None	-	1B.2	No
Arctostaphylos hookeri ssp. hookeri	Hooker's manzanita	None	None	-	1B.2	No
Arctostaphylos montereyensis	Toro manzanita	None	None	-	1B.2	No
Arctostaphylos pajaroensis	Pajaro manzanita	None	None	-	1B.1	No
Arctostaphylos pumila	sandmat manzanita	None	None	-	1B.2	No
Astragalus tener var. titi	coastal dunes milk-vetch	FE	CE	-	1B.1	No
Castilleja ambigua var. insalutata	pink Johnny-nip	None	None	-	1B.1	No
Chorizanthe pungens var. pungens	Monterey spineflower	FT	None	-	1B.2	Yes
Clarkia jolonensis	Jolon clarkia	None	None	-	1B.2	No
Collinsia multicolor	San Francisco collinsia	None	None	-	1B.2	No
Cordylanthus rigidus ssp. littoralis	seaside bird's-beak	None	CE	-	1B.1	No
Delphinium hutchinsoniae	Hutchinson's larkspur	None	None	-	1B.2	No
Ericameria fasciculata	Eastwood's goldenbush	None	None	-	1B.1	No
Erysimum menziesii	Menzies' wallflower	FE	CE	-	1B.1	Yes
Fritillaria liliacea	fragrant fritillary	None	None	-	1B.2	No
Gilia tenuiflora ssp. arenaria	Monterey gilia	FE	CT	-	1B.2	Yes
Hesperocyparis goveniana	Gowen cypress	FT	None	-	1B.2	No
Hesperocyparis macrocarpa	Monterey cypress	None	None	-	1B.2	No
Horkelia cuneata var. sericea	Kellogg's horkelia	None	None	-	1B.1	No
Layia carnosa	beach layia	FE	CE	-	1B.1	Yes
Lupinus tidestromii	Tidestrom's lupine	FE	CE	-	1B.1	Yes
Malacothamnus palmeri var. involucratus	Carmel Valley bush-mallow	None	None	-	1B.2	No
Microseris paludosa	marsh microseris	None	None	-	1B.2	No
Monardella sinuata ssp. nigrescens	northern curly-leaved monardella	None	None	-	1B.2	No
Monolopia gracilis	woodland woollythreads	None	None	-	1B.2	No
Pinus radiata	Monterey pine	None	None	-	1B.1	No
Piperia yadonii	Yadon's rein orchid	FE	None	-	1B.1	No

Potentilla hickmanii	Hickman's cinquefoil	FE	CE	-	1B.1	No
Rosa pinetorum	pine rose	None	None	-	1B.2	No
Sidalcea malachroides	maple-leaved checkerbloom	None	None	-	4.2	No
Trifolium hydrophilum	saline clover	None	None	-	1B.2	No
Trifolium polyodon	Pacific Grove clover	None	Rare	-	1B.1	No
Trifolium trichocalyx	Monterey clover	FE	CE	-	1B.1	No

* Relatively few confirmed recent records reflect in part severe difficulties in identifying this species due to its great similarity to the more widely distributed *B. vosnesenskii*. Until more experts can quickly and reliably identify this species it will be difficult to evaluate its conservation status.

Status definitions

FE	Federal ESA Endangered
FT	Federal ESA Threatened
CE	California ESA Endangered
CT	California ESA Threatened
Ccandidate	California ESA candidate for listing
SSC	California Species of Special Concern
FP	California Fully Protected species
CNPS rare plant rank 1B.1	Rare , Threatened or Endangered in California. Seriously Endangered in California
CNPS rare plant rank 1B.2	Rare , Threatened or Endangered in California. Fairly Endangered in California
CNPS rare plant rank 2B.1	Plants rare, threatened, or endangered in California but more common elsewhere
CNPS rare plant rank 4.2	Watch List: Plants of limited distribution

Under CEQA guidelines, an analysis of a project’s potential impacts includes determining whether the project will have a “substantial adverse effect, including mortality, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by CDFW or USFWS.

All of the plants constituting California Rare Plant Rank 1B & 2B meet the definitions of the California Endangered Species Act of the California Fish and Game Code, and are eligible for state listing. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, or those considered to be functionally equivalent to CEQA, as they meet the definition of Rare or Endangered under CEQA Guidelines §15125; (c) and/or §15380

Some of the plants constituting California Rare Plant Rank 4 meet the definitions of the California Endangered Species Act of the California Fish and Game Code, and few, if any, are eligible for state listing. CNPS recommends their inclusion