

Appendix B



General Habitat Suitability Evaluation

±65-acre Holly Street Site

Site Location:

San Bernardino South USGS 7.5-minute Quadrangle
Unsectioned Land, Township 2 South, Range 5 West
City of Riverside
San Bernardino County, California

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Introduction

The subject ±65-acre site is regionally located in the City of Riverside, San Bernardino County, California (**Plate 1**). Specifically, the project site is located east of Holly Street, west of Riverside Avenue, and north of Wilson Street. The site occurs on the "San Bernardino South" USGS 7.5-minute topographic map, Unsectioned Land, Township 2 South, Range 5 West (**Plate 2**).

Projects proposed in this area that contain potentially suitable habitat to support sensitive biological resources must demonstrate to reviewing agencies that potential project-related impacts to sensitive biological resources are adequately addressed and mitigated pursuant to the California Environmental Quality Act (CEQA) and the federal Endangered Species Act (Act) of 1973, as amended. Biological resources within the project site may fall under the jurisdiction of several federal and state agencies, including, but not necessarily limited to, California Department of Fish and Wildlife/Game (CDFW/CDFG), U.S. Fish and Wildlife Service (FWS), City of Riverside (City), County of San Bernardino (County), Regional Water Quality Control Board (RWQCB), and U.S. Army Corps of Engineers (USACE). Accordingly, results of this habitat suitability evaluation are intended to provide the applicant and resource agencies with preliminary biological information required for planning and permitting decisions concerning the proposed project.

Constraints posed by biological resources upon development of the proposed project were generally evaluated by ranking the following sensitive biological issues, listed in descending order of significance: (1) a federally or state-listed endangered or threatened species of plant or animal; (2) streambeds, wetlands, and their associated vegetation; (3) habitats suitable to support a federally or state-listed endangered or threatened species of plant or wildlife; (4) species designated as candidates for federal listing; (5) habitat, other than wetlands, considered sensitive by regulatory agencies or resource conservation organizations; (6) and other species or issues of special concern to agencies, resource conservation organizations, or other interest groups.

Due to the inherent limitations of unseasonal or habitat-based data, definitive conclusions regarding the actual presence or absence of selected sensitive biological resources cannot be made in this report. Therefore, conclusions relative to potential presence or absence of certain sensitive biological resources are based solely on the nature of habitat present. This general analysis of biological resources is based on information compiled through field reconnaissance, literature review, and by applicable reference materials. Methods used in this study are outlined below.

Investigative Methods

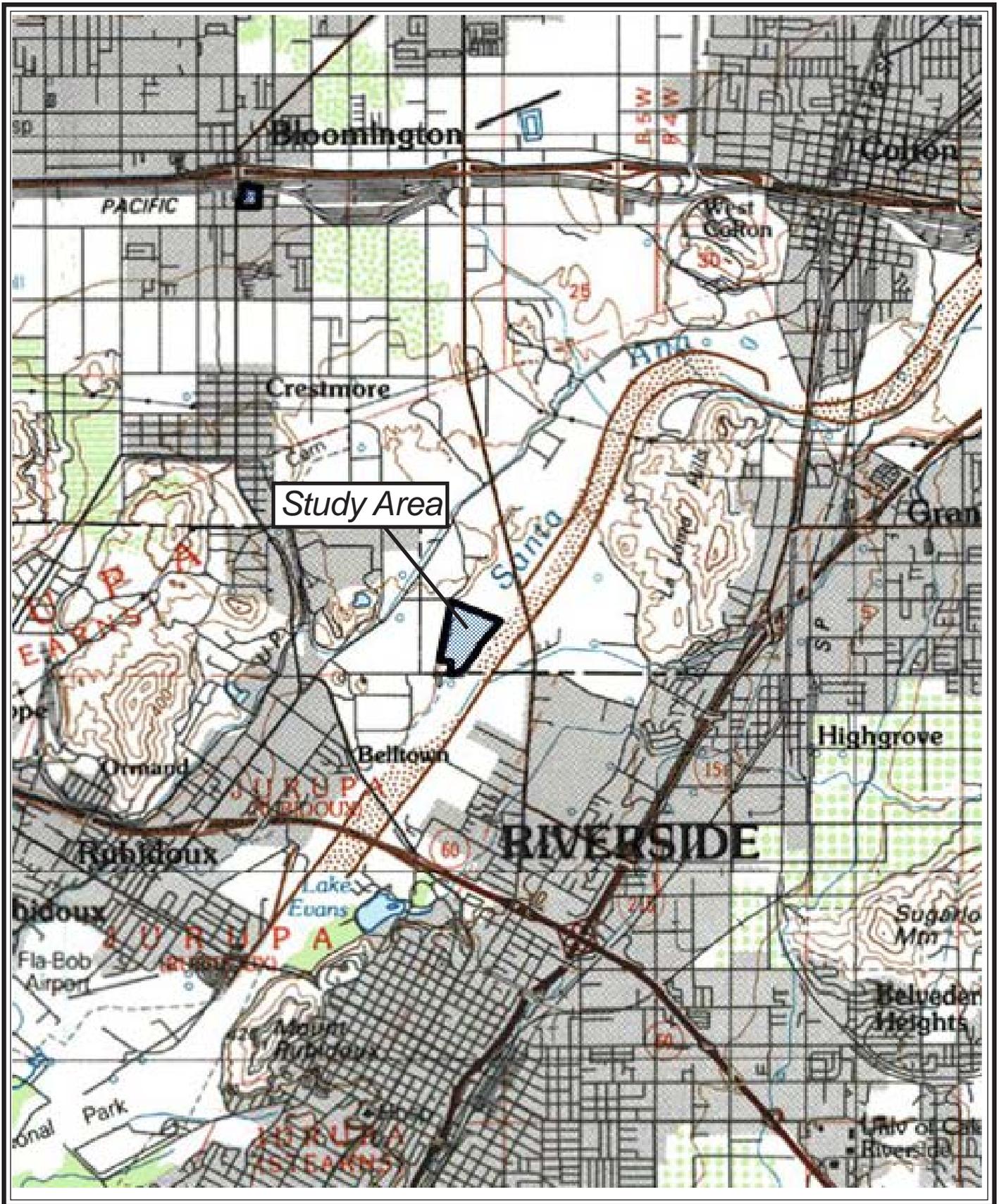
Information Review

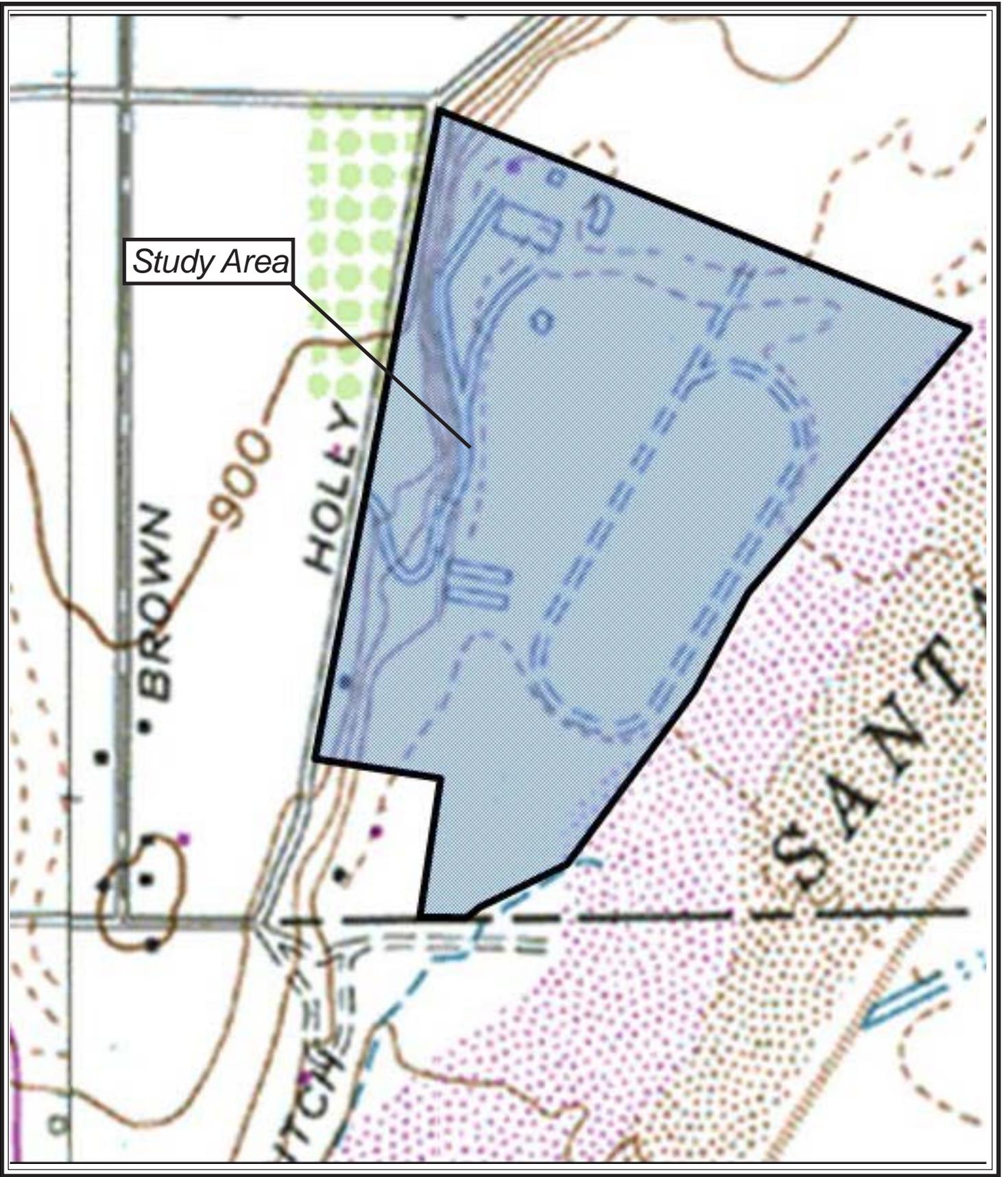
Documentation pertinent to the biological resources in the vicinity of the site was reviewed and analyzed. Primary data sources reviewed to evaluate the occurrence potential of special-status resources on the subject site, included, but were not necessarily limited to: (1) California Natural Diversity Data Base (CNDDDB 2017) and (2) California Native Plant Society (CNPS) on-line inventory for the "San Bernardino South" and surrounding 7.5-minute quadrangle maps; (3) available literature pertaining to habitat requirements of special-status species potentially occurring in the project site; (4) 2017 FWS Information, Planning, and Conservation System Database (IPaC); and (5) historic distributional data contained in Hall (1981); Grinnell and Miller (1944); Garrett and Dunn (1981); Holland (1986); Stebbins (1985); Hickman (1993); and CNPS (2001).

Field Survey

Ecological Sciences Principal Biologist, Scott Cameron, conducted a reconnaissance-level field survey to characterize on-site habitats and to evaluate their potential to support sensitive biological resources on March 13, 2017. Plant species and vegetation communities were primarily identified by walking







transects throughout the site. All direct observations of wildlife were recorded, as was wildlife sign. In addition to species actually detected, expected use of the site by other wildlife was evaluated from habitat analysis of the site, combined with known habitat preferences of locally occurring wildlife species. The site was also evaluated for the potential presence of plant, animal, or habitats considered rare, threatened, sensitive, endangered, or otherwise unique by regulatory or resource agencies. Weather conditions during the March 2017 survey were clear and calm with air temperatures of approximately 73-75 °F.

Existing Biological Environment

The site is generally characterized as an active motorcycle racetrack (Milestone MX) with multiple tracks with various skill levels. Associated infrastructure is present such as parking areas, out buildings, mechanic shops, trailers, residences, sheds, and various other structures. Debris dumping occurs in some areas of the site. Various fences and utility lines bisect the site. Active earth moving activities are also being conducted in support of track operations. The site historically was utilized for equestrian uses. Surrounding land uses/types include commercial, residential, developed areas, and the Santa Ana River. Elevation is approximately 830-900 feet above msl. **Plate 3** schematically illustrates site features/vegetation types. **Plates 4a-4d** photographically illustrate existing site conditions.

Vegetation

The site is dominated by disturbance-related areas supporting non-native grassland, ruderal/disturbed, grubbed, and developed areas. Ruderal plants recorded included various non-native grasses and weedy species such as foxtail chess (*Bromus madritensis* spp. *rubens*), riggut grass (*Bromus diandrus*), barley (*Hordeum* sp.), red-stemmed filaree (*Erodium cicutarium*), giant reed (*Arundo donax*), Russian thistle (*Salsola tragus*), mustard (*Brassica/Hirschfeldia/Sisymbrium* spp.), tree tobacco (*Nicotiana glauca*), cheeseweed (*Malva parviflora*), pigweed (*Amaranthus albus*), fleabane (*Conyza bonariensis*), nettle-leaved goosefoot (*Chenopodium murale*), castor bean (*Ricinus communis*), and stinging nettle (*Urtica urens*). Native species such as cottonwood (*Populus fremontii*), mule fat (*Baccharis salicifolia*), sycamore (*Platanus racemosa*), common sunflower (*Helianthus annuus*), black willow (*Salix gooddingii*), blue elderberry (*Sambucus mexicana*), and pineapple weed (*Matricaria discoidea*) were recorded scattered throughout the site. Exotic or cultivars included gum trees (*Eucalyptus* spp.), Brazilian pepper (*Schinus terebinthifolius*), palms (*Washingtonia* spp.), oleander (*Nerium oleander*), and other ornamental species.

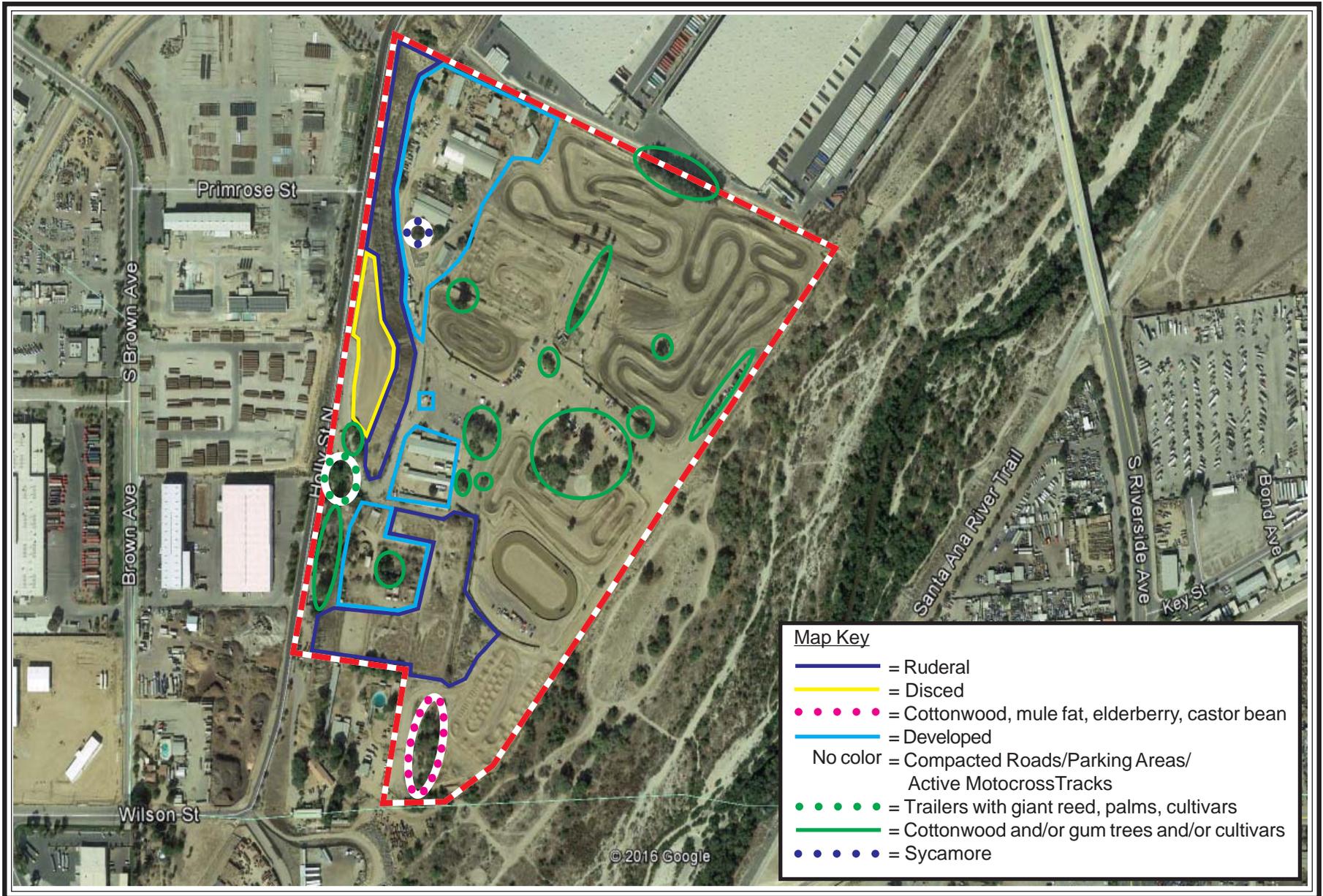
Wildlife

Bird species recorded during the survey included mostly those that are accustomed to existing development such as common raven (*Corvus corax*), mourning dove (*Zenaida macroura*), rock dove (*Columba livia*), black phoebe (*Sayornis nigricans*), northern mockingbird (*Mimus polyglottos*), European starling (*Sturnus vulgaris*), house finch (*Carpodacus mexicanus*), and house sparrow (*Passer domesticus*).

Soils

A general surface soils analysis was also conducted due to the close association of certain special-status plant species to particular soil types (e.g., clay or alkaline). Soils were generally highly compacted throughout the site from long-standing anthropogenic disturbances (e.g., motocross, equestrian, and associated infrastructure). Some friable areas were recorded along the southern property boundary. A review of the Natural Resource Conservation Service (NRCS 2017) for San Bernardino County, Southwestern Part, California. U.S. indicates that the site contains a small polygon of Delhi fine sand (Db) in the northwestern part of the site. Other mapped soil types include Tujunga gravelly loamy sand (TvC), Ramona sandy loam (RmC) and Psamments, Fluvents, and frequently flooded soils (Ps) adjacent to the Santa Ana River. **Plate 5** illustrates mapped soils for the site vicinity.





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- - - - - = Study Area

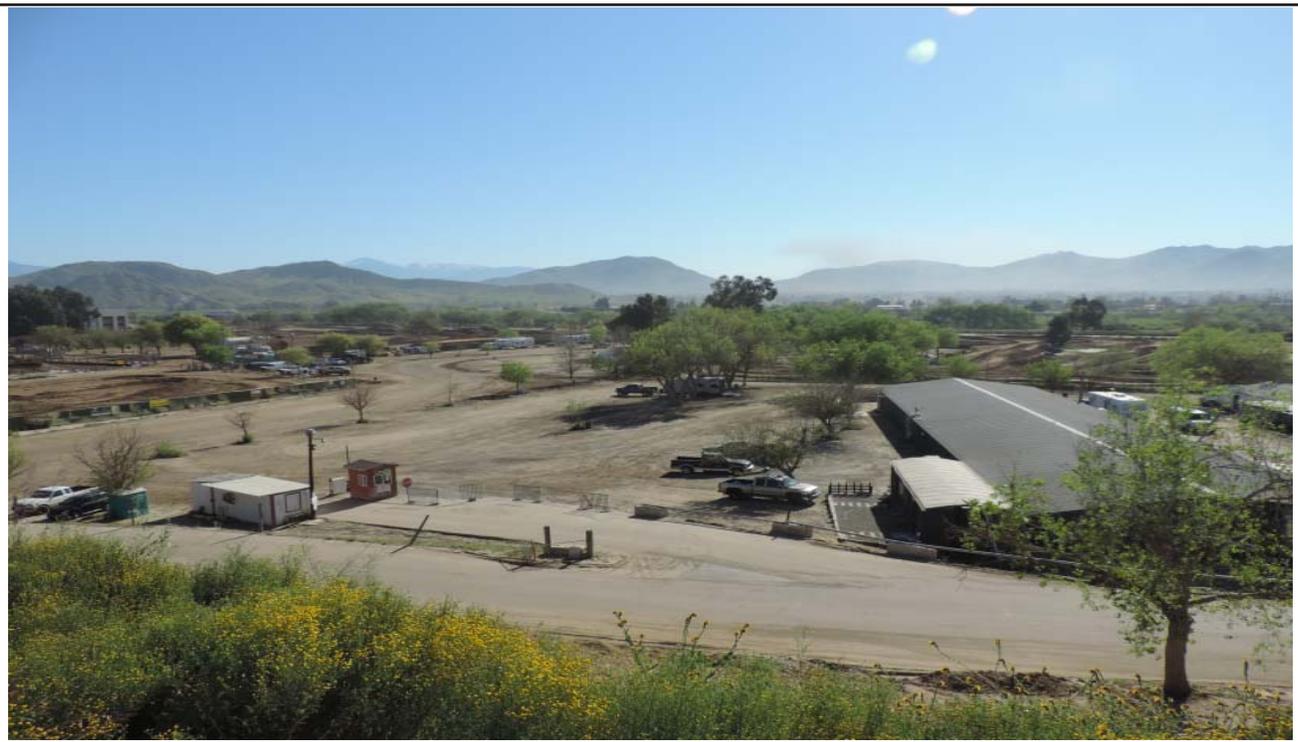
plate 3

Site Features Schematic

65-acre Holly Street Site



View to north near northern property boundary



View to east near northern property boundary



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plate **4a**

Site Photographs

65-acre Holly Street Site



View to northeast near southern property boundary



View to southwest near southern property boundary



View to west near center of site



View to east near center of site



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plate **4C**

Site Photographs

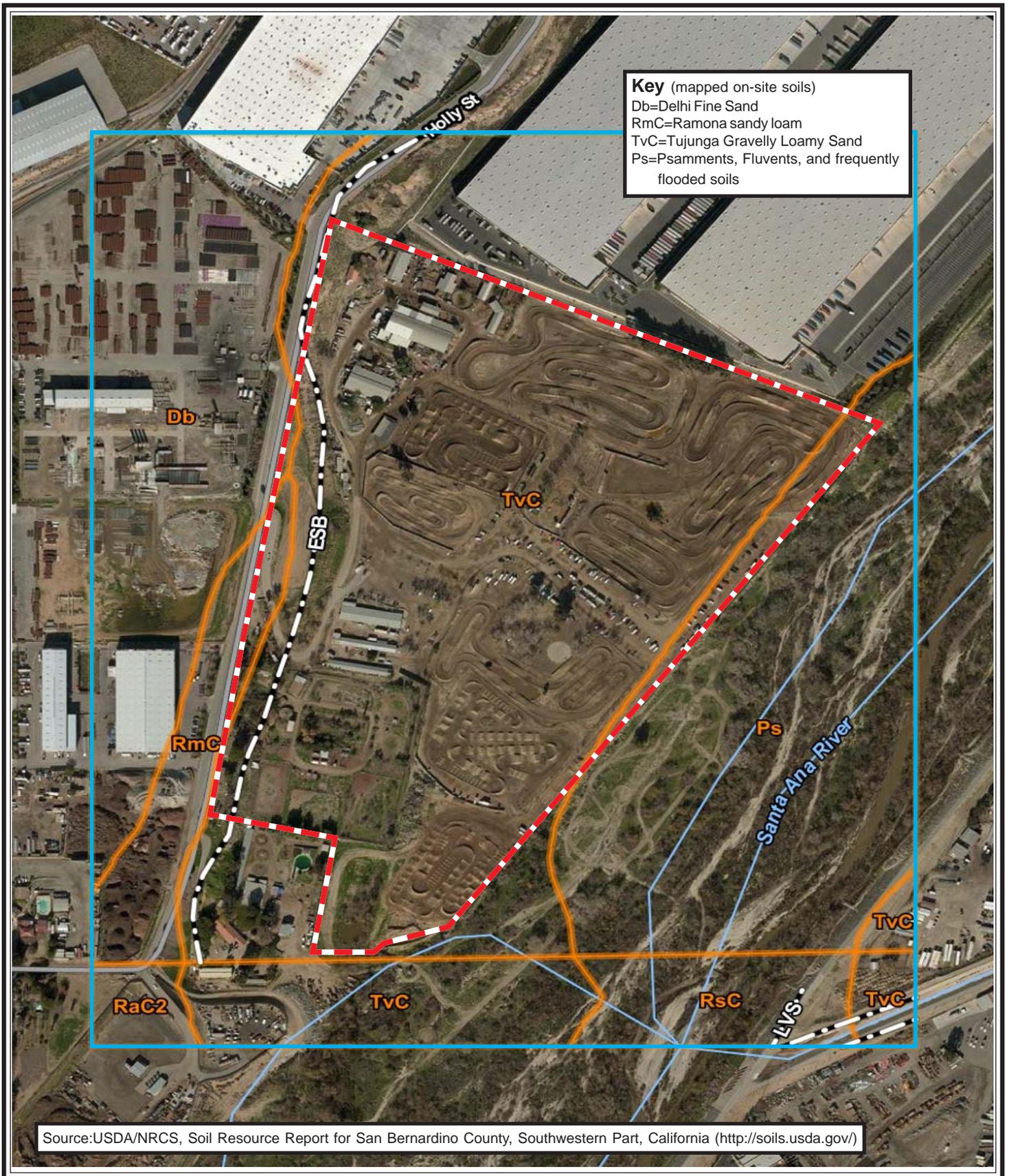
65-acre Holly Street Site



View to southwest from western portion of site



View to north from southwestern portion of site



Sensitive Biological Resources Evaluation

Discussed in this section are plant and wildlife species potentially present in the study area that have been afforded special recognition by federal or state agencies. The focus of this discussion is on those species that would potentially pose considerable constraints on the proposed project because of their high sensitivity status (listed or proposed for listing as rare, threatened, or endangered) with state and/or federal resource agencies. In addition, plants included on Lists 1, 2, 3, or 4 of the CNPS inventory are also considered of special-status. Vegetation communities that are unique, of relatively limited distribution, or of particular value to wildlife and considered sensitive by state and/or federal resource agencies are also generally discussed.

In general, those species presented in **Tables 1 and 2** that are “not expected” or that have a “low occurrence potential” generally correspond to “less than significant” under CEQA. The occurrence potential of special-status plant and wildlife species is primarily based on habitat types present, occurrence records of sensitive species from the site vicinity, and results of the on-site reconnaissance survey. No focused botanical or zoological surveys were conducted.

Special-Status Plant Species

No special-status plant species was detected on site during the reconnaissance survey, and none have more than a low occurrence potential due to the general absence of suitable habitat. Special-status plant species known from the region that potentially occur within the project site are summarized below in **Table 1**. Most special-status species are associated with the Santa Ana River.

Table 1
Special-Status Plant Species Known from the Site Vicinity¹

Common Name Scientific Name	Status			Habitat Requirements	Flowering Period	Occurrence Potential
	Federal	State	CNPS			
Listed Species						
Thread-leaved brodiaea <i>Brodiaea filifolia</i>	FE	CE	1B	Vernal pools, scrub, woodland, grasslands with clay soils	March-June	Not Expected: suitable habitat not present
Slender-horned spineflower <i>Dodecahema leptoceras</i>	FE	CE	1B	Chaparral, alluvial fan sage scrub; terraces and washes	April-June	Not Expected: suitable habitat not present
Santa Ana River woollystar <i>Eriastrum densifolium</i> ssp. <i>sanctorum</i>	FE	CE	1B	Coastal scrub (alluvial fan)	June-September	Not Expected: suitable habitat not present
Nevin's barberry <i>Berberis nevinii</i>	FE	CE	1B	Chaparral, cismontane woodland, coastal scrub, riparian scrub	March-April	Not Expected: suitable habitat not present
Marsh sandwort <i>Arenaria paludicola</i>	FE	CE	1B	Swamps and marshes	May-August	Not Expected: suitable habitat not present
Gambel's watercress <i>Rorippa gambelii</i>	FE	CT	1B	Fresh or brackish marshes	April-September	Not Expected: suitable habitat not present
Other Special-status Species						
Plummer's mariposa lily <i>Calochortus plummerae</i>	--	--	1B	Chaparral, coastal scrub, cismontane woodlands	May-July	Low Potential: marginally suitable habitat present

Table 1-continued

Special-Status Plant Species Known from the Site Vicinity¹

Common Name Scientific Name	Status			Habitat Requirements	Flowering Period	Occurrence Potential
	Federal	State	CNPS			
Palmer's mariposa lily <i>Calochortus palmeri</i> var. <i>palmeri</i>	--	--	1B	Chaparral, lower montane coniferous forest, meadows and seeps	May-July	Not Expected: suitable habitat not present
Parish's desert-thorn <i>Lycium parishii</i>	--	--	2	Sandy to rocky soils in coastal and Sonoran desert scrubs	March-April	Not Expected: suitable habitat not present; SBO populations thought to be extirpated
Parish's gooseberry <i>Ribes divaricatum</i> var. <i>parishii</i>	--	--	1B	Riparian woodlands	February-April	Not Expected: suitable habitat not present
Smooth tarplant <i>Centromadia pungens</i> ssp. <i>laevis</i>	FSC	--	1B	Alkaline grasslands, meadows, playas, scrub habitats	April-September	Not Expected: suitable habitat not present
Parry's spineflower <i>Chorizanthe parryi</i> ssp. <i>parryi</i>	FSC	--	3	Chaparral and coastal scrub; associated with sandy or rocky openings.	April-June	Low Potential: marginally suitable habitat present
White-bracted spineflower <i>Chorizanthe xantii</i> var. <i>leucotheca</i>	--	--	1B	Pinyon juniper woodland and desert scrub	April-June	Not Expected: suitable habitat not present
Mesa horkelia <i>Horkelia cuneata</i> ssp. <i>puberula</i>	--	--	1B	Sandy, gravelly coastal sage scrub habitats	February-September	Low Potential: marginally suitable habitat present
San Bernardino aster <i>Symphyotrichum defoliatum</i>	--	--	1B	Meadows and seeps, marshes and swamps; coastal scrub, woodlands; mesic grassland; ditches	July-November	Not Expected: suitable habitat not present
Pringle's monardella <i>Monardella pringlei</i>	FSC	--	1A	Sandy coastal scrub	May-June	Not Expected: suitable habitat not present
Salt spring checkerbloom <i>Sidalcea neomexicana</i>	--	--	2	Chaparral, coastal and desert scrubs, forests, alkaline playas	March-June	Not Expected: suitable habitat not present
Robinson's pepper-grass <i>Lepidium virginicum</i> var. <i>robinsonii</i>	--	--	1B	Chaparral and coastal scrub; associated with dry soils; known to occur on roadsides.	January-July	Low Potential: marginally suitable habitat present
Mesa horkelia <i>Horkelia cuneata</i> ssp. <i>puberula</i>	--	--	1B	Chaparral, cismontane woodland, coastal scrub; sandy or gravelly	February-September	Low Potential: marginally suitable habitat present

TABLE 1 KEY:¹Based primarily on review of 2017 CNDDb, 2017 CNPS online database, and 2017 FWS IPaC; additional locality information derived from internal unpublished data and technical reports from the region.

Federal		CNPS	
FE:	Federally Endangered	List 1A:	Plants presumed extinct in California.
FT:	Federally Threatened Species	List 1B:	Plants rare and endangered in California and elsewhere
FPE:	Federally Proposed Endangered	List 2:	Plants rare and endangered in California, but more common elsewhere
FPT:	Federally Proposed Threatened	List 3:	Taxa about which more information is needed
FC:	Federal Candidate Species	List 4:	Plants of limited distribution
State			
CE:	State Endangered		
CT:	State Threatened		
CR:	State Rare		



Special-Status Wildlife Species

No special-status wildlife species were directly observed on site, although several species not observed during the survey have a moderate occurrence potential (primarily nesting or foraging birds). Sensitive wildlife species potentially occurring on the project site are summarized below in **Table 2**. Most special-status species are associated with the Santa Ana River.

Table 2
Special-Status Wildlife Species Known from the Site Vicinity¹

Common Name Scientific Name	Status		Habitat Requirements	Occurrence Potential
	Federal	State		
FISHES				
Arroyo chub <i>Gila orcutti</i>	FSC	CSC	Slow moving or backwater sections of streams with sandy or mud substrates	Not Expected: suitable habitat not present
Santa Ana sucker <i>Catostomus santaanae</i>	FT	CSC	Small to medium sized perennial streams	Not Expected: suitable habitat not present; critical habitat present in adjacent Santa Ana River
INVERTEBRATES				
Delhi Sands flower-loving fly <i>Rhaphiomidas terminatus abdominalis</i>	FE	--	Open, sandy (Delhi) dune areas commonly supporting buckwheat, croton, telegraph weed, <i>Camissonia</i> and <i>Oenothera</i> .	Not Expected: suitable habitat not present
AMPHIBIANS AND REPTILES				
California red-legged frog <i>Rana aurora draytoni</i>	FE	CSC	Lowlands and foothills in or near permanent water sources; deep water with emergent vegetation	Not Expected; no suitable habitat present
Coast horned lizard <i>Phrynosoma blainvillii</i>	--	CSC	Relatively open grasslands, scrublands, and woodlands with fine, loose soil.	Low Potential: marginally suitable habitat present on site margins
Orange-throated whiptail <i>Aspidoscelis hyperythrus</i>	FSC	CSC	Relatively open grasslands, scrublands, and woodlands with fine, loose soil	Low Potential: marginally suitable habitat present on site margins
Coastal western whiptail <i>Aspidoscelis tigris multiscutatus</i>	--	◆	Sage scrub, chaparral, grassland	Low Potential: marginally suitable habitat present on site margins
Silvery legless lizard <i>Anniella pulchra pulchra</i>	FSC	CSC	Stabilized dunes, beaches, dry washes, pine, oak, and riparian woodlands, and chaparral; sparse vegetation with sandy or loose, loamy soils.	Not Expected: no suitable habitat present
San Bernardino ringneck snake <i>Diadophis punctatus modestus</i>	FSC	--	Woodlands, grassland, chaparral, and scrub habitats; often found in mesic areas under rocks, logs, and debris.	Not Expected: no suitable habitat present
Northern red diamond rattlesnake <i>Crotalus ruber ruber</i>	--	CSC	Sage scrub, chaparral, grasslands	Low Potential: marginally suitable habitat present on site margins
BIRDS				
White-tailed kite <i>Elanus leucurus</i>	MNBMC	CFP	Open vegetation and uses dense woodlands for cover	Moderate Potential: potentially forages over the site; no suitable nesting habitat
Northern harrier <i>Circus cyaneus</i>	--	CSC	Coastal salt marsh, freshwater marsh, grasslands, and agricultural fields	Moderate Potential: possibly forages over the site in winter; no suitable nesting habitat



Table 2-continued

Special-Status Wildlife Species Known from the Site Vicinity¹

Common Name Scientific Name	Status		Habitat Requirements	Occurrence Potential
	Federal	State		
Ferruginous hawk <i>Buteo regalis</i>	FSC, MNBMC	CSC	Grasslands, agricultural fields, and open scrublands	Moderate Potential: possibly forages over the site as seasonal migrant; does not breed in area
Golden eagle <i>Aquila chrysaetos</i>	--	CSC, CFP	Mountains, deserts, and open country	Low Potential: may occasionally forage over the site; no suitable nesting habitat present
Cooper's hawk <i>Accipiter cooperii</i>	--	CSC	Dense stands of live oaks and riparian woodlands.	Low Potential: may forage over the site; little suitable nesting habitat present
Prairie falcon <i>Falco mexicanus</i>	--	CSC	Grasslands, savannas, rangeland, agricultural fields, and desert scrub; requires sheltered cliff faces for shelter	Low Potential: may forage over the site in winter; no suitable nesting habitat present
Burrowing owl <i>Athene cunicularia</i>	FSC, MNBMC	CSC	Grasslands and open scrub	Low Potential: marginally suitable habitat present
Long-eared owl <i>Asio otus</i>	--	CSC	Riparian bottomlands to tall willows and cottonwoods; oaks along stream courses	Not Expected: suitable riparian habitat not present
Least Bell's vireo <i>Vireo bellii pusillus</i>	FE	CE	Willow dominated riparian habitat with dense understory	Not Expected: suitable riparian habitat not present
Southwestern willow flycatcher <i>Empidonax traillii extimus</i>	FE	--	Riparian habitats along rivers, streams, or other wetlands usually with standing water	Not Expected: suitable riparian habitat not present; critical habitat present in adjacent Santa Ana River
Yellow warbler <i>Dendroica petechia</i>	--	CSC	Riparian thickets and woodlands	Not Expected: suitable habitat not present
California horned lark <i>Eremophila alpestris actia</i>	--	CSC	Grasslands, disturbed areas, agriculture fields, and beach areas	Moderate Potential: suitable foraging habitat present
Coastal California gnatcatcher <i>Polioptila californica californica</i>	FT	CSC	Coastal sage scrub in areas of flat or gently sloping terrain	Not Expected: suitable habitat not present
Loggerhead shrike <i>Lanius ludovicianus</i>	--	CSC	Grasslands with scattered shrubs, trees, fences or other perches	Moderate Potential: suitable foraging habitat present
S. California rufous-crowned sparrow <i>Aimophila ruficeps canescens</i>	--	CSC	Coastal sage scrub, grasslands	Low Potential: marginally suitable habitat present
Bell's sage sparrow <i>Amphispiza belli belli</i>	MNBMC	CSC	Coastal sage scrub, chaparral	Low Potential: marginally suitable habitat present
Tricolored blackbird <i>Agelaius tricolor</i>	--	CSC	Marshes for nesting; forages in fields and scrub habitats	Low Potential: marginally suitable habitat present
MAMMALS				
Pocketed free-tailed bat <i>Nyctinomops femorosaccus</i>	--	CSC	Pine juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian; rocky areas with high cliffs	Low Potential: limited foraging and roosting habitat present
Western mastiff bat <i>Eumops perotis californicus</i>	FSC	CSC	Primarily arid lowlands and coastal basins with rugged, rocky terrain, along with suitable crevices for day-roosts; primarily a cliff-dweller	Low Potential: limited foraging and roosting habitat present
Western yellow bat <i>Lasurus xanthinus</i>	--	CSC	Valley foothill riparian, desert riparian, palm oasis	Low Potential: limited foraging and roosting habitat present



Table 2-continued

Special-Status Wildlife Species Known from the Site Vicinity¹

Common Name Scientific Name	Status		Habitat Requirements	Occurrence Potential
	Federal	State		
San Diego black-tailed jackrabbit <i>Lepus californicus bennettii</i>	--	CSC	Grasslands, shrublands	Moderate Potential: suitable habitat present
Northwestern San Diego pocket mouse <i>Chaetodipus fallax fallax</i>	--	CSC	Open shrublands, sandy areas	Low Potential: marginally suitable habitat present
Pallid San Diego pocket mouse <i>Chaetodipus fallax pallidus</i>	--	CSC	Open shrublands, sandy areas	Low Potential: marginally suitable habitat present
Los Angeles pocket mouse <i>Perognathus longimembris brevinasus</i>	FSC	CSC	Grasslands, open sage scrub	Low Potential: marginally suitable habitat present on southern site margins adjacent to River
San Bernardino kangaroo rat <i>Dipodomys merriami parvus</i>	FE	CSC	Coastal scrub, chaparral, alluvial regime	Not Expected: suitable habitat not present
Stephens' kangaroo rat <i>Dipodomys stephensi</i>	FE	CE	Grasslands, open sage scrub	Not Expected: outside species currently known range
San Diego desert woodrat <i>Neotoma lepida intermedia</i>	--	CSC	Moderate to dense sage scrub; rocky outcrops	Not Expected: suitable habitat not present
Southern grasshopper mouse <i>Onychomys torridus ramona</i>	FSC	CSC	Alkali desert scrub, desert riparian areas and other desert habitats; succulent scrub, wash, riparian, mixed chaparral, coastal scrub, and sage	Not Expected: suitable habitat not present
American badger <i>Taxidea taxus</i>	--	CSC	Drier open stages of shrub, forest, and herbaceous habitats with friable soils	Not Expected: suitable habitat not present

TABLE 2 KEY: ¹Based primarily on review of 2017 CNDDDB and 2017 FWS IPaC; additional locality information derived from internal unpublished data, technical reports from the region, and other informal grey literature.

Federal		State	
FE:	Federally Endangered	CE:	California Endangered
FT:	Federally Threatened	CT:	California Threatened
FPE:	Federally Proposed Endangered	CCE:	California Candidate (Endangered)
FPT:	Federally Proposed Threatened	CCT:	California Candidate (Threatened)
FC:	Federal Candidate for listing as threatened or endangered	CFP:	California Fully Protected
FSC:	Federal Species of Concern- no formal protection is granted to this designation	CP:	California Fully Protected
MNBMC:	Migratory Nongame Birds of Management Concern	CSC:	California Species of Special Concern

Special-Status Habitats

Special-status habitat types are vegetation communities that support concentrations of sensitive plant or wildlife species, are of relatively limited distribution, or are of particular value to wildlife (CNDDDB). Although sensitive habitats are not necessarily afforded legal protection unless they support protected species, potential impacts to them may increase concerns and mitigation suggestions by resources agencies. Special-status habitats known from the immediate site vicinity include Southern Cottonwood Willow Riparian Forest, Southern Willow Scrub, and Riversidean Alluvial Fan Sage Scrub. These habitat types do not occur within the subject property boundaries. No other sensitive habitat types are present on site. Most special-status habitats known from the site vicinity are associated with the Santa Ana River.



Jurisdictional Resources

Based on the field investigation conducted by Ecological Sciences, USACE “waters of the United States” per Sections 401-404 of the Federal Clean Water Act and “streambeds” per Section 1600-1603 of the CDFG Code were not observed on the property.

Wildlife Movement Corridors

The proposed project site is generally surrounded by existing development or disturbed areas (except for the Santa Ana River to the southeast), and therefore, it does not occupy an important location relative to wildlife movement. As such, project implementation would not be expected to have any substantial effect on local or regional wildlife movement.

Discussion

The level of constraint that a sensitive biological resource would pose to potential development typically depends on the following criteria: (1) the relative value of that resource; (2) the amount or degree of impact to the resource; (3) whether or not impacts to the resource would be in violation of state and/or federal regulations or laws; (4) whether or not impacts to the resource would require permitting by resource agencies; and (5) the degree to which impacts on the resource would otherwise be considered “significant” under CEQA. On-site habitats have been assigned a low biological constraint rating based on the degree in which expected impacts to on-site resources would meet the criteria discussed above. This designation is primarily due to the high level of current and historic site disturbances/land uses resulting in low biological diversity (i.e., replacement and exclusion of most native species with just a few non-native species) and an overall low potential for most special-status species to utilize or reside within areas proposed for development due to absence of suitable habitat.

No ***special-status plant species*** are expected on site due to lack of suitable habitat. The intent of the botanical survey was to generally evaluate the potential of the site to support sensitive plant species based on existing site conditions and habitat types present. Long-standing anthropogenic disturbances (e.g., equestrian, motocross, discing, mowing) have likely altered soil chemistry and other substrate characteristics such that on-site soils may not currently be capable of supporting most sensitive plant species known from the site vicinity. No habitat is present for Santa Ana River woolly star and the slender-horned spineflower on site. Accordingly, no impacts are expected to occur and no mitigation is required. Site development would not eliminate significant amounts of habitat for other potentially occurring special-status plant species, reduce population size of sensitive plant species below self-sustaining levels on a local or regional basis, nor constitute a CEQA-significant impact to any special-status plant species.

No ***special-status wildlife species*** were directly recorded on site. However, several sensitive wildlife species such as the loggerhead shrike, black-tailed jackrabbit, and California horned lark have a moderate occurrence potential due to the sites' close proximity to the Santa Ana River. These species were deemed by FWS to be too widespread and common to warrant listing as threatened or endangered, and as such, were removed from formal sensitive species status. At present, they have no state or federal listing status. Impacts to non-native ruderal areas, non-native grassland habitats, or otherwise highly disturbed areas (non-sensitive habitat types) and an expected low number of individuals displaced could amount to an incremental reduction of these species that could be considered locally adverse (if present on site during construction). However, site development would not eliminate significant amounts of habitat, nor reduce population size below self-sustaining levels on a local or regional basis. No CEQA significant impacts to these species would be expected.

Species of particular note for the site vicinity include the Delhi Sands flower-loving fly (DSFF), San Bernardino kangaroo rat (SBKR), and Los Angeles pocket mouse (LAPM). Although an extremely small

portion of the site is mapped as containing Delhi soils (Db) and the Vulcan Materials DSF Reserve site is located ±2.0 miles northeast of the site, existing conditions are not consistent with those known or expected to support extant DSFF populations in the region. The mapped Db soil area is entirely within a routinely disced and/or highly disturbed area of the site. Accordingly, the context in which this area occurs does not constitute a substantive native Db plant community most commonly associated with potential DSFF habitat. Therefore, no impacts to DSFF are expected and no mitigation is required for less than significant impacts. No suitable habitat is present for the SBKR, and no impacts are expected to occur and no mitigation is required. LAPM are well know to occur in the site vicinity both east and west of the Santa Ana River (recorded at Agua Mansa Commerce Center located about 3,000' northeast of the subject site, Jones & Stokes 2008). However, only marginally suitable habitat is present along some of the southern site margins (solely due to the proximity of the Santa Ana River), and therefore, impacts to the LAPM from this project are not significant and no mitigation is required for less than significant impacts.

Development of the proposed project would remove disturbed/ruderal areas, disced/grubbed fields and other disturbed areas potentially suitable for foraging by several species of **sensitive raptors** (e.g., white-tailed kite, northern harrier, Cooper's hawk) during winter or migration periods. Because most potentially occurring raptor species are very widespread and roam over large areas of foraging territory, these losses would amount to an incremental reduction of seasonal foraging habitat and occasional use areas that could be considered locally adverse. However, site development would not eliminate significant amounts of foraging habitat for these species, nor reduce population size below self-sustaining levels on a regional basis. Accordingly, development of the site would not constitute CEQA-significant adverse impacts to any of the affected species locally or regionally.

No direct observations or **western burrowing owl (BUOW)** sign (feathers, pellets, fecal material, prey remains, etc.) were recorded during the reconnaissance-level survey. However, several California ground squirrel burrows potentially suitable to accommodate BUOW were recorded on site. None of the potential burrows inspected during the survey effort were determined to be currently occupied or recently used by BUOW based on the lack of owl observations and absence of sign around burrow entrances. Despite that fact that the site has been exposed to long-standing disturbances, the BUOW (low occurrence potential outside areas routinely exposed to motocross activities) often occur in less than optimal and/or disturbed conditions. While this species is not protected by state or federal endangered species acts, burrowing owls (and other native avian species) are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711) and CDFG Code sections 3503, 3503.5, and 3800 which prohibits take, possession, or destruction of birds, their nests or eggs (in particular raptor species such as BUOW). If it were later determined that active nests of BUOW (or other native species) would be lost as a result of site-preparation, it could result in CEQA significant adverse impacts and would be in conflict with these regulations.

Specific burrowing owl survey protocol and mitigation guidelines were developed and described in the 2012 CDFG Staff Report on Burrowing Owl Mitigation in order to reduce project-related impacts to burrowing owls. If site preparation activities occur within potential BUOW habitat, a **pre-construction burrowing owl/Initial Take Avoidance Survey** conducted no less than 14 days prior to initiating ground disturbance activities using the recommended methods described in the 2012 Staff Report is required by CDFG to determine if active nests of species protected by the MBTA and/or CDFG codes are present in the construction zone for CEQA compliance and to subsequently evaluate appropriate measures that may reduce potential adverse project-related impacts..

Implementation of avoidance and minimization measures would be triggered by positive owl presence on the site where project activities would occur. Burrowing owls may re-colonize a site after only a few days. Time lapses (i.e. construction delays) between project activities could trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance (CDFG 2012). Should eggs or fledglings be discovered in any owl burrow or native nest, these resources cannot be disturbed (pursuant to CDFG guidelines) until the young have hatched and fledged



(matured to a stage that they can leave the nest on their own). Take of active nests should always be avoided. If owls must be moved away from the disturbance area, *passive* relocation techniques (where applicable outside of the breeding season before breeding behavior is exhibited and after the burrow is confirmed empty by site surveillance) should be used rather than trapping (2012 CDFG Staff Report). If burrow exclusion and/or burrow closure is implemented, BUOWs should not be excluded from burrows unless or until: (1) a Burrowing Owl Exclusion Plan is developed and approved by the applicable local CDFG office; and (2) permanent loss of occupied burrow(s) and habitat is mitigated in accordance with the Mitigating Impacts (CDFG 2012).

No nesting birds were incidentally observed during surveys conducted on the subject site in March 2017. Although many ***native bird species*** are not protected by state or federal/state endangered species acts, most are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711) and CDFG Code sections 3503, 3503.5, and 3800 which prohibits take, possession, or destruction of birds, their nests or eggs. If it were later determined that active nests of any of special-status or native species would be lost or indirectly impacted as a result of site-preparation, it could result in adverse impacts and would be in conflict with these regulations. If construction activities (e.g., tree removal) were proposed during the nesting season, a nesting bird survey is recommended prior to development to determine if active nests are present in the construction zone or within an appropriate buffer area as part of project approval. For example, a 500-foot buffer to reduce potential indirect impacts (e.g., construction noise) may be required from the Santa Ana River where least Bell's vireo may be actively nesting during the breeding season. Often the most effective manner in which to establish these buffer areas is to have a biological monitor present during demolition and grubbing. Development activities performed outside of the avian breeding season (generally September 1 to January 31) usually eliminates the need to conduct pre-activity nesting surveys for most native species known from the site vicinity, and ensure that there were no constraints to construction relative to the MBTA/CDFG code. Compliance with the MBTA/CDFG codes would be necessary prior to development; however no special permit or approval is typically required in most instances.

Conclusion

Results of the habitat suitability evaluation indicate that habitats present on the ±65-acre site represent low biological resource values based on the degree in which expected impacts to on-site resources would meet CEQA criteria discussed above and the context in which they occur (e.g., highly disturbed conditions present in a predominantly degraded environment). The existing condition of the site is the direct consequence of long-standing exposure to various anthropogenic activities (equestrian, motocross) resulting in low biological diversity (e.g., dominance of non-native species), absence of special-status plant communities, and overall low potential for most special-status species to utilize or reside on site. Construction activities would not be expected to directly impact federal- or state-listed threatened or endangered species, jeopardize the continued existence of listed species (or special-status species), nor directly impact designated critical habitat. Site development would also not be expected to substantially alter the diversity of plants or wildlife in the area because of current degraded site conditions. The loss of these disturbance-related habitats would not be expected to substantially affect special-status resources or cause a population of sensitive plant or wildlife species to drop below self-sustaining levels.

Although no native habitat types are present, and no listed species (currently protected by state or federal endangered species acts) are expected to occur due to absence of suitable habitat, the potential presence of certain special-status species (e.g., primarily nesting birds) may impose some degree of constraint to development depending upon the nature of both direct and indirect impacts on these resources, as well as on the particular species and seasonal timing of construction activities. During permitting procedures, certain measures (generally described in Discussion section) to avoid or further reduce potential project-related impacts to sensitive biological resources may be necessary pursuant to CEQA.

Φ



I hereby certify that the statements and exhibits furnished herein present the data and information required for this biological survey, and that the facts, statements, and information presented herein are true and correct to the best of my knowledge and belief. If you have any questions regarding the results presented in this report, please don't hesitate to call.

Sincerely,

Ecological Sciences, Inc.



Scott D. Cameron
Principal Biologist

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