May 21, 2019

CITY OF REDLANDS
DEVELOPMENT SERVICES DEPARTMENT
Attention: *Catherine Lin, AICP*
35 Cajon St. Suite 20
Redlands, California 92373

SUBJECT: **Peer Review of ECORP Consulting's San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*; SBKR) Habitat Assessment and a SBKR Trapping Study Prepared for the 5-Acre Sessums Property (APN 0168-041-50 and 0168-041-13) Located in the City of Redlands, San Bernardino County, California**

Dear Ms. Lin,

ELMT Consulting (ELMT) conducted a peer review of the SBKR Habitat Assessment and a SBKR Trapping Study prepared by ECORP Consulting for the 5-Acre Sessums Property (APN 0168-041-50 and 0168-041-13) located in the City of Redlands, San Bernardino County, California. In addition, ELMT conducted a site inspection of the site, as well as the surrounding properties to verify/reconfirm biological resources documented in the two report, and assess the suitability of the habitat to support SBKR. Biologists at ELMT have been assessing and inventorying SBKR within this immediate area of the project site for over twenty (20) years and used its knowledge of SBKR within this area as part of its peer review.

As pointed out by ECORP Consulting's two reports, the project site occurs in an area immediately south of the Santa Ana River wash system and is separated from direct access for SBKR within the watershed by the Redlands Airport. The project site occurs within an area of industrial developments associated with the Redlands Municipal Airport, and recreational and residential developments. Specifically, the site is bounded on the north by Sessums Drive, the Redlands Sports Complex and areas of undeveloped land to the south, and undeveloped, but graded land to the east and west. ECORP's reports acknowledged that SBKR is known to be abundant within the Santa Ana River wash system and historically occupied the orange groves and undeveloped lands surrounding the airport. Their reports further indicate that development within this area has eliminated much of the native habitat and restricted the distribution of SBKR to "small, isolated, and less disturbed parcels of land; Most of these parcels are located away from the Santa Ana River wash system and now likely lack the animal." However, based on personal field notes from Steve Montgomery (SJM Consulting), SBKR were trapped in large numbers approximately 1,250 feet to the west within the Judson Ranch residential tract.

Based on a suitability assessment of the project site, ECORP concluded that the property, which had been "recently graded/grubbed and was almost completely devoid of vegetation" did not provided suitable

habitat for SBKR. In addition, the suitability assessment stated that the potential for SBKR to occur on the property was extremely low, and that SBKR is likely absent from the project site. Further, ECORP concluded that due to the installation of a chain-link fence, which included a small mammal exclusion fence attached to the base, the likelihood of future colonization of the site by SBKR was very low. Following a review of ECORP's report, the United States Fish and Wildlife Service (USFWS) requested a focused small mammal trapping study to verify the findings of the SBKR Habitat Assessment. A 5-night trapping study was conducted March 25 through March 29 and determined that SBKR are "absent on the project site at this time" and that no impact to the species will result from development of the site. Further, ECORP's trapping study concluded that "the small mammal exclusion fence will deter animals from occupying the property" and that "no avoidance, minimization, and mitigation measures for SBKR are recommended at this time."

ELMT visited the project site on May 14, 2019 and concurs with ECORP's findings that the project site does not currently provide suitable habitat for SBKR. The recent grading has removed all native vegetation and has compacted the soils, eliminating any areas that could provide suitable habitat for SBKR or other small mammals. The March trapping study found that not only are SBKR absent from the project site but that all small mammal species normally found in the area were absent. No small mammals were trapped within the property. The exclusionary fence, combined with the removal of vegetation and compaction of soils, would be expected to keep the site free of SBKR for a period of time. However, it needs to be noted that exclusionary fences are not totally effective and over time become dis-repaired. SBKR occurring in the general area, if present, have the potential to recolonize the site.

As part of its review of the reports and site investigation, ELMT also assessed the potential presence of SBKR on the surrounding properties. Based on this additional assessment, ELMT concluded that:

1. Without continual grading and maintenance of the site, SBKR would be expected to re-occupy the 5-acre Sessums property. Although the surrounding properties are either developed or being maintained through disking, sufficient habitat occurs in the area to support SBKR. SBKR can rapidly recolonize a site if access was available.
2. SBKR were found at the location of the Sports Park, detention basin on Sessums Drive and within the Judson Ranch residential development prior to development and required consultation with the USFWS and acquisition of Incidental Take Permits (ITPs).
3. The inspection of the strip of habitat between the southern boundary of the project site and the Sport Park provides low-quality habitat but could support SBKR and provide a movement corridor for the species. There was no obvious sign of SBKR during a brief assessment.
4. The properties bordering the western and eastern boundaries of the project site are undeveloped, but are being routinely disked for weed control and to reduce the potential for SBKR. However, the Judson Ranch residential development was also maintained this way, following completion of CEQA, and the acquisition of an ITP due to the discovery of a small number of SBKR during CEQA. The ITP required that up to 39 SBKR thought to occupy the site be relocated offsite. Relocation efforts took place a year later and removed nearly 400 SBKR from the site.
5. The western property was fenced and inaccessible. The eastern property was not fenced and was walked. Small mammal sign was present on the eastern parcel, particularly along the boundaries

that disking did not occur. The attached photos show the presence of small mammal burrows that are likely K-Rat burrows and potentially SBKR based on size and the history of SBKR in the area.

6. It is unlikely that SBKR occur within the Redlands Municipal Airport or that they would access the project site from the north.
7. Without knowledge of existing site conditions prior to the recent grading and fencing, it is impossible to determine if SBKR occurred on the project site or not. Given the above findings, it is possible that SBKR occurred onsite. However, ECORP's studies determine that SBKR is currently not found on the site. Their conclusion that SBKR is not likely to reoccupy the site, given development and regime of disking for properties in immediate area, is not supported by the above findings.

Please do not hesitate to contact Tom McGill at (951) 285-6014 or tmcgill@elmtconsulting.com should you have any questions on this review. We are available to meet at City Hall to discuss this mater further.

Sincerely,

Thomas J. McGill, Ph.D.
Managing Director

Travis J. McGill
Director

Attachments:

A. *Site Photographs*

Attachment A

Site Photographs

Photograph 1: Looking at the northeast corner of the project site. Note large scalebroom plant just outside the exclusionary fence. Scalebroom is an indicator plant associated with Riversidean Alluvial Fan Sage Scrub (RAFSS) habitat which is the native plant community where SBKR are found.

Photograph 2: Looking north from the northern boundary of the project site at the Redlands Airport.

Photograph 3: Looking north from the southeast boundary of the project site at the graded and compacted soils on the site which have precluded SBKR from establishing burrows.

Photograph 4: Looking south from the northeast corner of the property approximately 500 feet west of the project site, at a narrow corridor of disturbed RAFSS habitat along Sessums Drive that is separated from the project site by the graded and fenced property bordering the western boundary of the site.

Photograph 5: Looking west from the southern portion of the graded, unfenced property east of the project site.

Photograph 6: View of a disturbed, but open RAFSS habitat that borders the southern boundary of the project.

Photograph 7: Looking at a small mammal burrow within the disturbed RAFSS habitat immediately south of the project site, that could support SBKR.