CRITERIA REFINEMENT ANALYSIS
(CRITERIA REFINEMENT 21-03-09-01)

BEAUMONT POINTE SPECIFIC PLAN/
PROPOSED CORE 3

WESTERN RIVERSIDE COUNTY, CALIFORNIA

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1.0 INTRODUCTION

On behalf of the City of Beaumont and the Applicant (Beaumont Pointe Partners, LLC), Glenn Lukos Associates, Inc. (GLA) has prepared this Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Criteria Refinement Process (CRP) analysis to modify the Criteria identified for Criteria Cells associated with lands to be developed as part of the Beaumont Pointe Specific Plan. The Beaumont Pointe Specific Plan (the "Project") is located in the MSHCP Criteria Area. The term "Criteria Area" as defined by the MSHCP is the area comprised of Cells depicted on Figure 3-1 of the MSHCP. This refers to the collection of Criteria Cells and Cell Groups that describe lands for conservation to support assembly of the MSHCP Reserve, i.e., "Reserve Assembly". Specifically, the Project site is within portions of independent Cells 933, 936, 1030, 1032, and 1125 (The Pass Area Plan) where lands are described for conservation to support the assembly of Proposed Core 3[1], with proposed offsite conservation lands located in a portion of Cell Group A' (Reche Canyon/Badlands Area Plan). Exhibit 2B depicts boundary line for the two Area Plans.

GLA transmitted an initial CRP analysis to the RCA on February 8, 2022. Based on GLA's analysis, the RCA completed Criteria Refinement Review Findings to support the Criteria Refinement (#21-03-09-01), which were transmitted to the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), referred to jointly as the Wildlife Agencies, on March 11, 2022. The Wildlife Agencies provided a comment letter to the City of Beaumont on May 12, 2022. The following is an excerpt of the comments from the Wildlife Agencies' letter:

> *The Beaumont Pointe Specific Plan development site is located in the Potrero/Badlands Subunit (Subunit 1) of The Pass Area Plan. The MSHCP Planning Species for the Potrero/Badlands Subunit include mountain lion, bobcat, the threatened Stephen's kangaroo rat, Bell's sparrow, and Southern California rufous-crowned sparrow, among other species. The maintenance of large blocks of Habitat for large mammal movement between the northern and southern sections of the San Bernardino National Forest, and Core and Linkage habitat for mountain lion are among the identified Biological Issues and Considerations (Section 3.2.3) for this Subunit.*
>
> *To accommodate the wildlife movement considerations mentioned above, the California Department of Transportation and the Riverside County Transportation Commission expended significant local, State, and federal dollars to construct a wildlife crossing beneath State Route 60 (Highway 60) at the northwest end of the Project site to enabling large mammal movement between the interior of the Proposed Core 3 and the area north of Highway 60 and the San Bernardino National Forest. Public funds were expended identifying a location for this mammal crossing that is biologically appropriate (usable by mountain lions and bobcats), technically feasible (buildable), be financially feasible and would not constrain or jeopardize traffic flow on Highway 60. Years of effort went*

[1] Proposed Core 3 associated with the Project site is not to be confused with the Proposed Extension of Existing Core 3. Proposed Core 3 represents an entirely new Core area, whereas the Proposed Extension of Existing Core 3 is an extension of Existing Core E located near Lake Elsinore.

into selecting a feasible location, and then designing this undercrossing so that it would function to enable large mammal movement between Proposed Core 3 and the area north of Highway 60.

If the Project is built with the current design, the existing wildlife crossing would direct wildlife into a small north-south trending valley which terminates at a steep ridgeline with topography that does not facilitate animal movement into the interior of Proposed Core 3. We are concerned that mountain lion and bobcat use of the corridor would be inhibited by the narrowness of the canyon and the proximity of Project activities (the sights and sounds of people, moving vehicles, nighttime lighting, and noise on the Project site). Edge effects from adjacent development or disturbed areas can be biologically significant for distances of at least 300 meters within corridor areas (Beier 2018). Large mammals tend to be guided by terrain when moving across large landscapes such as utilizing valley and canyon bottoms preferentially over steep slopes. Mountain lions prefer relatively wide buffers between their movement corridors and nearby human activity, and in general wildlife corridors should be at least 2 km wide where feasible (Beier 2018).

To avoid the degradation of the existing large mammal crossing, the Wildlife Agencies request that the development footprint be modified to pull out of Criteria Cell 933 (approximately 34 acres) and include the larger connecting valley in the Criteria Refinement conservation strategy so that large mammals can traverse the valley southward into Proposed Core 3 and northward to the wildlife undercrossing. We understand that the proposed development footprint might shift to accommodate this change. We also acknowledge that some of the area in Criteria Cell 933 where we have requested avoidance is not described for conservation, however, the public investment in the Highway 60 undercrossing and the benefit to the MSHCP Conservation scenario should not be eroded by the Project.

GLA's initial CRP analysis proposed 213.03 acres of total conservation, including 49.55 acres in Cell 933. As noted by the above-referenced comments, the Wildlife Agencies requested that the proposed development footprint be revised to further pull away from the existing (recently constructed) large mammal crossing under State Route 60 (SR-60) within Cell 933. The Wildlife Agencies requested that the development footprint be pulled out of Cell 933 altogether, which, per their comment letter, would have increased the conservation in Cell 933 by another 34 acres compared with the initial Project proposal. On June 8, 2022, the Project Proponent transmitted to the RCA their proposed design revisions to address the Wildlife Agencies' comments, which the RCA then transmitted to the Wildlife Agencies. The proposed revisions do not pull the development footprint entirely out of Cell 933 (the revisions will increase the conservation by approximately 19 acres instead of 34 acres). However, the Wildlife Agencies agreed with the proposed project design revisions conserving the additional 19 acres in Cell 933 and indicated that the Project Proponent could move forward on submitting a revised CRP analysis to the RCA for finalization[2]. The following CRP analysis is based on the revised Project design that was reviewed by the Wildlife Agencies.

[2] The RCA notified the Project Proponent and the City of Beaumont via email on July 21, 2022, which also confirmed that same day via email by the Wildlife Agencies.

Approximately 206.89 acres of the Project site is described for conservation based on the Cell Criteria[3] for Cells 933, 936, 1030, 1032, and 1125. Of the 206.89 acres of lands described for conservation within these Cells, the Project will impact 109.69 acres and conserve 97.20 acres. In addition, the Project will conserve another 55.22 acres of undescribed lands (onsite) within these Cells. All undescribed lands to be conserved are referred to in this analysis as "replacement lands". As such, the impacts and conservation are presented in the following four categories, which are depicted on multiple exhibits [Exhibit 2B, 3, 4B, 5, 6A, 6B, 7 and 8A]:

- Described Lands – Impact (109.69 acres)
- Described Lands – Proposed Conservation (97.20 acres)
- Undescribed Lands – Onsite Replacement (55.22 acres)
- Undescribed Lands – Offsite Replacement (78.40 acres)

The combined onsite conservation of described lands and replacement lands will result in a surplus of conservation in Cell 933 but are not enough to offset the impacts to 109.69 acres of described lands, resulting in an overall conservation deficit of 54.47 acres for Cells 936, 1030, 1032, and 1125. However, another 78.40 acres of offsite undescribed lands (replacement) will be conserved, including 37.89 acres in Cell Group A' and the 40.51 acres that are not within a Criteria Cell, but adjacent to Cell Group A', resulting in an overall conservation surplus of 23.93 acres for the Project. Table 1-1 below summarizes the proposed impacts and conservation. The areas of proposed impact and conservation (described and undescribed lands) are also depicted on Exhibit 5 [Reserve Assembly Analysis Map].

[3] For a number of reasons, the MSHCP does not provide exact and specific areas to represent "described conservation" based on the stated Criteria for each Cell Group and independent Cell. As such, the actual acreages presented in this ***Analysis*** to represent MSHCP "described conservation" are based on GLA's hand-drawn GIS interpretation of the Cell Criteria as an approximation of the midrange goal of the described percentage range. For example, the Criteria for Cell 933 describes a conservation range of 20% to 30%, resulting in a conservation midrange of 25%. As presented in Appendix B of this ***Analysis***, GLA adjusted the boundaries of the applicable Criteria Cells for GIS analysis due to discrepancies between existing County GIS and more accurate property survey boundaries, and to correct apparent errors in the initial establishment of the Criteria Cells. As a result, the acreages presented in this ***Analysis*** are close to but are not an exact representation of the midrange percentages (in some cases slightly less and in others slightly greater). Table 1-1 below presents an overall conservation surplus of 23.93 acres, although the actual surplus may be within a margin of error of one to two acres.

Table 1-1. Summary of Proposed Impacts and Conservation (in acres)

Criteria Cell	Described Conservation	Described Lands – Impact	Described Lands – Proposed Conservation	Undescribed Lands – Replacement	Conservation Surplus or (Deficit)
Onsite					
933	37.85	16.04	21.81	47.03	30.99
936	25.51	24.19	1.32	0.00	(24.19)
1030	30.25	13.72	16.53	0.16	(13.56)
1032	81.76	42.75	39.01	5.54	(37.21)
1125	31.52	12.99	18.53	1.13	(11.86)
No Cell	N/A	N/A	N/A	1.36	1.36
Onsite Subtotal	**206.89**	**109.69**	**97.20**	**55.22**	**(54.47)**
			152.42 (onsite conservation)		
Offsite					
Cell 1125	N/A	N/A	N/A	37.89	37.89
No Cell	N/A	N/A	N/A	40.51	40.51
Offsite Subtotal				**78.40**	**78.40**
Total	**206.89**	**109.69**	**97.20**	**133.62**	**23.93**

This Analysis further presents that the proposed Criteria Refinement would be at least equivalent to the existing Criteria as it applies to Effects on Habitats, Effects on Covered Species, Effects on Core Areas, Effects on Linkages and Constrained Linkages, Effects on Non-Contiguous Habitat Blocks, Effects on MSHCP Conservation Area Configuration and Management, Effects on Ecotones, and Acreage Contributed to the MSHCP Conservation Area.

2.0 PROJECT DESCRIPTION

2.1 Project Location

The Beaumont Pointe Specific Plan (the "Project") represents approximately 539.9 acres in unincorporated Riverside County, California [Exhibit 1 – Regional Map] and is located within the City of Beaumont's Sphere of Influence (SOI). The 78.40-acre "offsite" proposed conservation area is also within unincorporated Riverside County but is outside of the City's SOI. The Project would require annexation of the Project site into City of Beaumont from unincorporated Riverside County. The Project site is located within Sections 1, 2, and 12 of Township 3 South and Range 2 West of the U.S. Geological Survey (USGS) 7.5" quadrangle map El Casco, California (dated 1967 and photorevised in 1979) [Exhibit 2A – Vicinity Map]. The City of Beaumont is located east of the City of Moreno Valley and unincorporated Riverside County, west of the City of Banning and unincorporated Riverside County, north of the City of San Jacinto and unincorporated Riverside County, and south of the City of Calimesa and

unincorporated Riverside County. California State Route (SR-60) abuts the Project site to the north, Interstate 10 (I-10) is located approximately 1.5 miles to the north of the site, and California State Route 79 (Highway -79) is located approximately 1.5 miles to the east of the site.

At the local scale, the Project site is located west of Jack Rabbit Trail and south of SR-60. The Project site includes 11 individual parcels plus a portion of Jack Rabbit Trail, including Assessor Parcel Numbers (APNs): 422-060-002, 422-060-005, 422-060-009, 422-060-010, 422-060-016, 422-060-017, 422-060-018, 422-060-021, 422-060-022, 422-170-005, and 422-170-008. The four parcels for the proposed offsite conservation include 422-170-007, 422-170-009, 422-170-010, and 422-170-011. Tables 2-1 and 2-2 list the APNs for the Project site and the offsite conservation, respectively, including the associated Area Plan Sub-Unit and Independent Cell/Cell Group. Exhibit 2B depicts the Assessor's Parcels.

Table 2-1. APNs for the Project Site

Project APNs	Project Sub-Unit	Independent Cell/Cell Group
422-060-002*	SU1 – Protrero/Badlands	933, 936
422-060-005*	SU1 – Protrero/Badlands	933
422-060-009	SU1 – Protrero/Badlands	1030, 1032
422-060-010*	SU1 – Protrero/Badlands	1030, 1032
422-060-016	N/A	N/A
422-060-017	N/A	N/A
422-060-018	N/A	N/A
422-060-021	SU1 – Protrero/Badlands	1032
422-060-022*	SU1 – Protrero/Badlands	1032, 1125, Cell Group A'
422-170-005*	SU1 – Protrero/Badlands	1125
422-170-008	SU1 – Protrero/Badlands	1125
Jack Rabbit Trail Easement	N/A	N/A

* - All or a portion of the parcel is described for conservation.

Table 2-2. APNs for the Offsite Conservation Parcels

Offsite Conservation APNs	Project Sub-Unit	Cell Group
422-170-007	SU3 – Badlands North	A'
422-170-009	SU3 – Badlands North	A'
422-170-010*	SU3 – Badlands North	A'
422-170-011	SU3 – Badlands North	A'

* - A portion of this APN is in an undescribed portion of Cell Group A'; the majority is outside of (but adjacent to) the Criteria Area.

The boundaries for the APNs, MSHCP Criteria Cells, existing Public/Quasi-Public (PQP) Conserved Lands, and Jack Rabbit Trail right-of-way (ROW) as depicted in the Riverside

County GIS files are not fully accurate relative to the surveyed boundaries for the Project. The acreages referenced throughout this document are based on the actual surveyed boundaries. Appendix B provides a discussion of the GIS analysis and internal adjustments made by GLA to the Criteria Cells and PQP Conserved Lands to match with the surveyed boundaries.

2.2 Project Description

The Project Applicant (Beaumont Pointe Partners, LLC) proposes to develop a recreational/entertainment commercial development of approximately 246,000 square feet (SF) of general commercial uses in addition to a 125-room hotel and approximately 4,995,000 SF of industrial and warehouse uses. The Project will be developed in at least four phases with buildout expected by 2027.

As summarized in table 2-3 below, the Project site contains 263.39 acres of proposed open space, including 124.70 acres designated as "Project Maintained Open Space" (Planning Area [PA] 9) consisting of open space to be managed by the Project, and 152.42 acres designated as "Conservation Land" (PA 10) that would be conserved as natural habitat to support Reserve Assembly as required by the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Portions of the 124.70 acres in PA 9 will be impacted by remedial grading, improved with manufactured slopes, and/or used for wildfire fuel modification purposes. Disturbed areas within the Project Maintained Open Space will be re-planted with native vegetation to the greatest extent possible and will serve as a buffer between the development footprint and the proposed Additional Reserve Lands (ARL). The Project Applicant is also proposing to conserve 78.40 acres of land located outside of the Project boundary for MSHCP Reserve Assembly. Altogether, a total of 230.82 acres is proposed for conservation in support of MSHCP Reserve Assembly. The Project's Land Use Plan (LUP) is attached as Appendix A and is also represented in Exhibit 3 [Site Plan Map].

Table 2-3. Additional Reserve Lands and Other Open Space (in acres)

	Additional Reserve Lands	Project Maintained Open Space	Total Open Space
Planning Area 9	0	124.70	**124.70**
Planning Area 10	152.42	0	**152.42**
Offsite Conservation	78.40	0	**78.40**
Total	**230.82**	**124.70**	**355.52**

The Project would construct four main roadways for on-site circulation, including 4th Street, Jack Rabbit Trail, Entertainment Avenue, and Industrial Way. 4th Street would be constructed along the southern boundary of the Project site from Jack Rabbit Trail at the easterly edge of the Project site and would extend from its current proposed terminus to the east at Jack Rabbit Trail, culminating at a cul-de-sac at the western edge of PA 7, with a 40-foot private access road continuing along the southern boundary of PA 8.

Jack Rabbit Trail road is an existing two-lane road that runs from the Jack Rabbit Trail/SR-60 off-ramp, through the Project site and continuing further south to eventually connect to Gilman Springs Road in the Hemet area. The Project would re-route the section of Jack Rabbit Trail road from the SR-60 off-ramp to 4th Street to connect with the existing Jack Rabbit Trail at the south edge of the Project site. Entertainment Avenue would be constructed as a curvilinear street connecting Jack Rabbit Trail and 4th Street south of PA 2 and PA 3, on the west side of PA 1. Industrial Way, a private access road, would be constructed along the northern boundary of the Project site from Entertainment Avenue culminating at the western edge of PA 7.

Regional access to the Project site would be provided from SR-60 at Potrero Boulevard and I-10 at Beaumont Avenue. Local access to the Project site would be provided from the future extension of 4th Street from Jack Rabbit Trail to Potrero Boulevard currently under construction as part of the Hidden Canyon project; 4th Street between Jack Rabbit Trail and Potrero Boulevard is planned as an industrial collector with a 78-foot right-of-way and 56-foot curb-to-curb, which is consistent with the width of 4th Street and the eastern end of the Project site. Until an SR-60 /Jack Rabbit Trail interchange is constructed, access from the Project site to the SR-60 via Jack Rabbit Trail is proposed to be restricted, with the northerly portion of Jack Rabbit Trail to the SR-60/Jack Rabbit Trail interchange utilized as secondary emergency egress (and fire and emergency vehicle ingress) only.

The Project's fuel modification limits will partially extend in the Project Maintained Open Space (PA 9) but will not encroach into the existing MSHCP Conservation Area or the ARL proposed by the Project. The fuel modification limits are depicted on Exhibit 3.

3.0 CRITERIA REFINEMENT

3.1 Proposed Core 3

The Project site is located within Criteria Cells 933, 936, 1030, 1032, and 1125 of Subunit 1 (Potrero/Badlands) of The Pass Area Plan, and with "offsite" proposed conservation located within Cell Group A' of Subunit 3 (Badlands North) of the Reche Canyon/Badlands Area Plan. For each of these Cells and the one Cell Group, lands described for conservation will contribute to the assembly of Proposed Core 3. The MSHCP defines a Core as "a block of Habitat of appropriate size, configuration, and vegetation characteristics to generally support the life history requirements of one or more Covered Species." Proposed Core 3 (Badlands/Potrero) is located in the northeast region of the overall MSHCP Plan Area. The Proposed Core consists mainly of private lands but also contains a few Public/Quasi-Public parcels including De Anza Cycle Park. The Core is connected to Proposed Linkage 12 (north San Timoteo Creek), Proposed Linkage 4 (Reche Canyon), Proposed Constrained Linkage 22 (east San Timoteo Creek), Existing Core H (Lake Perris), Existing Core K (San Jacinto Mountains), Proposed Linkage 11 (Soboba/Gilman Springs), and Proposed Constrained Linkage 21. Exhibits 4A and 4B provide the general area of Proposed Core 3, which includes existing Conserved Lands and lands that are described for conservation but have not yet been conserved, and also depict the Beaumont Pointe Project site, which is located along the northeastern edge of the Proposed Core, south of the State Route 60.

Specific Linkages are not identified as part of Proposed Core 3; however, the overall area identified for the Proposed Core supports wildlife movement and therefore functions as a Linkage, connecting the San Bernardino National Forest to the southwest with San Bernardino County and other conserved areas to the north of the Core. Exhibit 4A notes that the general wildlife movement through the Core is northwest to southeast, although it is acknowledged that movement occurs throughout the Core lands, including through and alongside the Project site. However, the Project site itself is not recognized as a specific MSHCP Linkage. With a total acreage of approximately 24,920 acres, Proposed Core 3 is one of the largest Core Areas identified for the MSHCP. As noted above, the Proposed Core is contiguous with Existing Core H (Lake Perris/Mystic Lake) and Existing Core K (San Jacinto Mountains), thus greatly enlarging the functional area of the Core. The Core has both a large proportion of its area unaffected by edge (approximately 23,420 acres of the total 24,940 acres) and is only partially constrained by existing land uses, including agricultural use.

As the Proposed Core covers a large area, the MSHCP identifies a number of Planning Species that would utilize portions of the Core for live-in and movement habitat, including southern California rufous-crowned sparrow (***Aimophila ruficeps canescens***), Bell's sage sparrow (***Amphispiza belli belli***), cactus wren (***Campylorhynchus brunneicapillus***), loggerhead shrike (***Lanius ludovicianus***), San Bernardino kangaroo rat (***Dipodomys merriami parvus***), Stephens' kangaroo rat (***Dipodomys stephensi***), bobcat (***Lynx rufus***), Los Angeles pocket mouse (***Perognathus longimembris brevinasus***), mountain lion (***Puma concolor***), Nevin's barberry (***Berberis nevinii***). Not all of these species have the potential to occur to occur at the Project site, and therefore not all are relevant to this analysis. However, those applicable species are discussed in this document. The MSHCP notes that management of edge conditions will be necessary in the Badlands to maintain high quality habitat for these species. The proposed Project site will have approximately 10,000 linear feet of edge adjacent to the existing and proposed Conserved Lands. As such, the Project will implement measures to address the Guidelines Pertaining to Urban/Wildlands Interface (MSHCP Volume I, Section 6.1.4) for the management of edge factors such as lighting, noise, urban runoff, toxics, and unauthorized access.

Regarding lighting, the MSHCP states that “night lighting shall be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting in the MSHCP Conservation Area is not increased.” Lighting associated with the Project will be designed for consistency with the MSHCP. Chapter 8.50 of the City of Beaumont Municipal Code addresses outdoor lighting for development projects. The ordinance states the intent to “establish regulation and standards which will reduce light pollution generated by residential, commercial and industrial lighting fixtures and devices, minimize light pollution which has a detrimental effect on the environment and the enjoyment of the night sky, reduce and minimize lighting and lighting practices which cause unnecessary illumination of adjacent properties, correct problems of glare and light trespass, and reduce energy use.” The ordinance promotes shielding and limits the type and intensity of the light fixtures depending on the extent of shielding. In addition, the Project proponent is performing a lighting study and developing a conceptual lighting plan to demonstrate that there will be no offsite lighting trespass into the adjacent MSHCP Conservation Area.

3.2 Reserve Assembly and Criteria Refinement

Volume I, Section 6.5 (Criteria Refinement Process [CRP]) of the MSHCP states that individual public and private projects within the Plan Area are expected to be designed and implemented in accordance with the Criteria for each Area Plan presented in *Volume I, Section 3.2* of the MSHCP document. The goal of the MSHCP is to have a total Conservation Area in excess of 500,000 acres, including approximately 347,000 acres on existing Public/Quasi-Public (PQP) Lands, and approximately 153,000 acres of Additional Reserve Lands (ARL) to be acquired within the MSHCP Criteria Area. Projects located within the Criteria Area must be evaluated to determine if lands within those properties are described to contribute to Reserve Assembly. Criteria Refinements are an important part of the Reserve Assembly process to achieve goals for Covered Species, Covered Habitats, etc. However, in cases where refinements to the Criteria are desirable to facilitate Reserve Assembly, including for development projects that would otherwise be inconsistent with the existing Criteria, the CRP described in *Volume I, Section 6.5* shall apply. Criteria Refinements may be initiated by Local Permittees, or at the request of private entities to Local Permittees if agreed to by the applicable Local Permittee, either for purposes of correcting minor discrepancies or inaccuracies or for evaluating alternative conservation proposals involving single or multiple landowners and jurisdictions that are of equivalent or superior benefit to Covered Species. Such Criteria Refinements may involve changes to Cores and Linkages as long as it is demonstrated that the Refinements would clearly benefit Covered Species and would be consistent with MSHCP policies and species conservation goals. However, the CRP cannot be used for Criteria changes that would result in a reduction in the amount of lands conserved relative to the minimum acreages described by the Criteria. A Criteria Refinement can be approved with lesser conservation in one or more Cells provided that the decrease is made up with other lands in the Criteria Area not described by the Criteria that satisfy the goals for Covered Habitats, Covered Species, etc., or with lands outside of the Criteria Area that similarly satisfy the goals.

The Project site is located within Criteria Cells 933, 936, 1030, 1032, and 1125 of Subunit 1 (Potrero/Badlands) of The Pass Area Plan, and the offsite proposed conservation (offsite replacement lands) is located within Cell Group A' of Subunit 3 (Badlands North) of the Reche Canyon/Badlands Area Plan. The boundary separating the two Area Plans is depicted on Exhibit 2B. As stated in the MSHCP (Volume I, Section 3.3.1, page 3-114), "the County's General Plan Area Plan boundaries were selected to provide the broad organizational framework for the Criteria" and that "while these boundaries are not biologically based, they related specifically to County planning boundaries and to the boundaries of incorporated Cities within the MSHCP Plan Area. The Area Plan framework for the criteria-based approach was selected to structure implementation strategies around established planning boundaries." Although the Project site and the "offsite" proposed conservation are divided between the two Area Plans on the basis of general planning boundaries, the intent of the proposed Criteria Refinement is to allow for a development project that establishes a biological equivalency with its proposed conservation. The following analysis describes that although the Project would not satisfy the minimum Criteria for some of the individual Cells, additional lands are proposed for conservation that would overall not just exceed the minimum conservation goal for the combined Cells and Cell Group but would also exceed the midpoint of the described conservation range.

Each Independent Cell and Cell Group has specific Criteria that describes the amount of each Cell or Cell Group to be conserved, the intended location of the conservation within the Cell or Group, specific Habitat types that are to be conserved, and any applicable Cores or Linkages that conserved land is to support. The acreage of described conservation is based on a percentage of the Cell or Cell Group, expressed either as a specific percentage goal or as a percentage range. The acreage of described conservation for each Cell or Group is calculated using the percentage goal and the gross acreage of the Cell or Cell Group. The Criteria for the five Cells associated with the Project (933, 936, 1030, 1032 and 1125) are included in *Volume I, Section 3.3.10* of the MSHCP, and are also provided below in Table 3-1. Oftentimes a portion of a Cell or Cell Group will contain lands that were conserved prior to the adoption of the MSHCP (i.e., PQP lands). In those cases, the amount of lands described for conservation by the Cell Criteria is not based on the net acreage of the Cell or Cell Group minus the PQP lands, but instead the percentage and location goals take into account the PQP lands and the Criteria focus on other parts of the Cell or Cell Group that are not yet conserved. The Project is associated with three Criteria Cells (933, 1030 and 1032) where portions of the Cells contain PQP conserved lands. For example, the southwestern portion of Cell 933 contains PQP lands and the Criteria for Cell 933 describes 20% to 30% of the Cell to be conserved within the southeastern portion of Cell. The amount of lands described for conservation in Cell 933 is calculated by multiplying the described conservation percentage with the gross Cell acreage (157.16 acres based on GLA's adjustment of the Cell boundaries), with a resulting conservation range of approximately 31 acres to 47 acres (approximate midrange goal of 37.85 acres based on GLA's hand-drawn representation as an approximation of the Criteria).

Table 3-1. Cell Criteria for The Pass Area Plan

Cell	Criteria
933	Conservation within this Cell will contribute to assembly of Proposed Core 3. Conservation within this Cell Group will focus on chaparral, coastal sage scrub, and water. Areas conserved within this Cell Group will be connected to chaparral and wetland habitat proposed for conservation in Cell #936 to the east. Conservation within this Cell Group will range from 20%-30% focusing on the southeastern portion of the cell.
936	Conservation within this Cell will contribute to assembly of Proposed Core 3. Conservation within this Cell Group will focus on grassland, chaparral, and coastal sage scrub. Areas conserved within this Cell Group will be connected to uplands proposed for conservation in Cells #933 and #1030 to the west and south. Conservation within this Cell Group will range from 10%-20% focusing on the southwestern portion of the Cell Group.
1030	Conservation within this Cell will contribute to assembly of Proposed Core 3. Conservation within this Cell will focus on chaparral, coastal sage scrub, and grassland. Areas conserved within this Cell will be connected to uplands proposed for conservation in Cells #1032 and #936 to the east and north. Conservation within this Cell will range from 15%-25% focusing on the northeastern portion of the Cell.
1032	Conservation within this Cell will contribute to assembly of Proposed Core 3. Conservation within this Cell will focus on chaparral, coastal sage scrub, and

Cell	Criteria
	grassland. Areas conserved within this Cell will be connected to uplands proposed for conservation in Cells #1030 and #1125 to the west and southeast, and to chaparral and coastal sage scrub habitat proposed for conservation in Cell Group A' in the Reche Canyon/Badlands Area Plan to the south. Conservation within this Cell will range from 45%-55% focusing on the southwestern portion of the Cell.
1125	Conservation within this Cell will contribute to assembly of Proposed Core 3. Conservation within this Cell will focus on chaparral and coastal sage scrub. Areas conserved within this Cell will be connected to uplands proposed for conservation in Cell #1032 to the northwest and in Cell Group A' in the Reche Canyon/Badlands Area Plan to the west and south. Conservation within this Cell will range from 15%-25% focusing on the northwestern portion of the Cell[4].

Based on the described percentage ranges for each Cell, the approximate range of described conservation for all five Cells is 166 to 247 acres. Applying the approximate midrange goals to all five Cells associated with the Project site, the total described conservation is approximately 206.89 acres (see Table 3-2 below). The Project proposes a total of 230.82 acres of conservation to support Reserve Assembly for Proposed Core 3 [Exhibit 5 – Reserve Assembly Analysis Map], including 152.42 acres onsite (97.20 acres of described lands to be conserved and 55.22 acres of onsite replacement lands) and 78.40 acres of offsite replacement lands. The 152.42 acres of onsite conservation includes 151.06 acres associated with the five onsite Criteria Cells (930, 936, 1030, 1032 and 1125) and 1.36 acres located outside of the Criteria Area (adjacent to Cell 1032 and Cell 1125). However, as shown below in Table 3-2, the onsite conservation of 152.42 acres does not satisfy the midrange goals for Cells 936, 1030, 1032, and 1125, resulting in a conservation deficit of 54.47 acres for the onsite portion [Exhibit 5 – Reserve Assembly Analysis Map]. To offset the conservation deficit, approximately 78.40 acres of offsite conservation is proposed, including 37.89 acres of undescribed lands in Cell Group A' and 40.51 acres of undescribed lands located outside of (but adjacent to) the Criteria Area. As such, a Criteria Refinement is needed to approve the alternate conservation proposal. Section 5 of this document provides an equivalency analysis demonstrating that the proposed Criteria Refinement will satisfy the existing Criteria goals for Covered Habitats and Covered Species; contribute to the assembly of Proposed Core 3; will not affect Linkages, Non-Contiguous Habitat Blocks, or Ecotones; will provide a configuration that will support the management of adjacent Conserved Lands; and will sufficiently conserve lands to result in a net increase of ARL compared with the existing Criteria.

[4] Cell 1125 is shared between the Pass Area Plan and the Reche Canyon/Badlands Area Plan. The total acreage of Cell 1125 is approximately 156.39 acres. Within the Reche Canyon/Badlands Area Plan only a portion of Cell 1125 is included within Cell Group A' along with the entirety of Cell 1126, with a total acreage of Cell Group A' of approximately 244.51 acres. However, although the Area Plan boundary shows only the remaining portion of Cell 1125 to be geographically within the Pass Area Plan, the percentage range goal identified by the Cell Criteria is intended to be applied to the gross acreage of the Cell (personal communication with the RCA) and not just the portion within the Pass Area Plan boundary.

Table 3-2. Summary of Project Conservation for The Pass Area Plan (in acres)

Criteria Cell	Total Cell Acreage[5]	Described Conservation[6]	Described Lands – Impact	Described Lands – Proposed Conservation	Undescribed Lands – Replacement	Conservation Surplus or (Deficit)
933	157.16	37.85	16.04	21.81	47.03	30.99
936	163.01	25.51	24.19	1.32	0.00	(24.19)
1030	152.71	30.25	13.72	16.53	0.16	(13.56)
1032	162.83	81.76	42.75	39.01	5.54	(37.21)
1125	156.39	31.52	12.99	18.53	0.00	(12.99)
No Cell	N/A	N/A	N/A	N/A	1.36	1.36
Total		**206.89**	**109.69**	**97.20**	**54.09**	**(55.60)**

The remainder of the lands proposed for conservation (all offsite) are within the Reche Canyon/Badlands Area Plan. A portion of the proposed conservation consists of undescribed lands within Cell Group A', with the remainder consisting of undescribed lands located outside of the Criteria Area (south of Cell Group A'). Cell Group A' is irregularly shaped, consisting of the entirety of Cell 1126 and a portion of Cell 1125, for a total of 244.51 acres. The Cell Criteria in *Volume I, Section 3.3.11* for the Reche Canyon/Badlands Area Plan, describes the conservation of 55 percent to 65 percent (approximately 134 to 159 acres) in the western portion of the Cell Group, corresponding to a midrange goal of approximately 146.74 acres. Approximately 154.26 acres in the western part of Cell Group A' are already protected as RCA Conserved Lands. The Project proponent owns 37.89 acres of undescribed lands in the eastern portion of Cell Group A' adjacent to the existing Conserved Lands that is available for conservation. Combining the existing Conserved Lands (154.26 acres) and proposed replacement conservation (37.89 acres), the total conservation for Cell Group A' would be 192.15 acres. Table 3-3 summarizes Cell Group A' for the Reche Canyon/Badlands Area Plan.

[5] The Criteria Cell acreages are based on GLA's redrawing of the Criteria Cell boundaries using Project boundaries that are based on the ALTA survey.

[6] The described conservation acreages presented in Table 3-2 are an approximation of the midrange goals stated by the Criteria based on GLA's hand-drawn representation of the described conservation areas in GIS. In addition, since the Cell acreages presented in Table 3-2 are based on adjustments made by GLA to address boundary inaccuracies with County GIS data, it is understood that there is a margin of error in the acreages of about one to two acres.

Table 3-3. Summary of Cell Group A' Conservation for The Reche Canyon/Badlands Area Plan (in acres)

Cell Group	Total Cell Group Acreage	Described Conservation	Existing RCA Conserved Lands	Proposed Conservation (Offsite)	Total Conservation Cell Group A'
A' (Cell 1125)	244.51	146.74	154.26	37.89	192.15

In addition to lands within the Project site, the Project proponent owns another 40.51 acres of undescribed lands that are outside of the Criteria Area, south of Cell Group A' [Exhibit 5]. Altogether, the Project proposes approximately 230.82 acres of conservation, including 152.42 acres onsite (1.36 acres located outside of the Criteria Area) and 78.40 acres offsite (37.89 acres within Cell Group A' and 40.51 acres located outside of the Criteria Area). Combining both the onsite and offsite conservation, including 133.62 acres of replacement conservation to offset impacts to 109.69 acres of described lands, the proposed conservation exceeds described conservation identified by the Cell Criteria. Table 3-4 summarizes the combined conservation proposed for the Project.

Table 3-4. Summary of Proposed Versus Described Conservation (in acres)

	Proposed Conservation	Described Conservation	Conservation Surplus or (Deficit)
Onsite (Cells 933, 936, 1030, 1032, 1125)	152.42	206.89	(54.47)
Onsite Subtotal	***152.42***	***206.89***	***(54.47)***
Offsite (Cell Group A')	37.89	N/A	37.89
Offsite Lands not in Criteria Area	40.51	N/A	40.51
Offsite Subtotal	***78.40***	***N/A***	***78.40***
Totals	**230.82**	**206.89**	**23.93**

3.3 Need and Rationale for the Criteria Refinement

The objective of the proposed Project is to develop within the City of Beaumont a 540-acre mixed-use project featuring 246 acres of industrial uses and 30 acres of commercial uses. Based on the changing retail model, with increasing retail goods being purchased on-line and delivered directly to the consumers, there is a significant demand for warehouse and distribution centers throughout southern California. There is a particularly strong demand for such facilities on or near major transportation routes such as SR-60 and I-10.

Modern warehouse and distribution facilities require large industrial buildings (600,000 to 1,400,000 square feet) in rectangular configurations with long bays of loading docks on opposite sides of the buildings and ample parking areas for truck storage and employees. The facilities also require large water quality treatment basins and a road circulation system that provides access to all sides of the buildings for trucks, employees, and fire/emergency services.

The Beaumont Pointe property has significant topographic constraints, including a major ridge that runs generally from the southeast to the northwest through the property. The Project proponent considered several conceptual grading and design layouts to find the right balance between generating enough development area to make the project economically viable, while preserving as much of the described open space as possible. In order to create the large flat pads necessary for the industrial buildings, the majority of the site must be graded, including remedial grading within PA9 that will become open space managed by the Project. An additional 230.82 acres of lands are proposed as ARL to support Reserve Assembly for Proposed Core 3.

Achieving the conservation goals under a strict adherence to the existing Cell Criteria would create a checkerboard type of conservation plan across the southern half of the property which would make it impossible to develop the site to satisfy the goals of the Project. The requested adjustments to the Cell Criteria are necessary and appropriate to allow an economically viable project to be developed at the property while still achieving the overall Reserve Assembly goals for Proposed Core 3, including accommodating wildlife movement along the southwestern edge of the Project site.

4.0 EXISTING CONDITIONS

4.1 Vegetation Communities/Land Uses

This section describes the vegetation mapping for the overall Project site and the offsite conservation area, including using GLA's vegetation mapping from 2020 as well providing the vegetation mapping from the 1994 MSHCP Rough Step baseline. Table 4-1 provides a summary of vegetation communities/land use types for the Study Area using GLA's vegetation mapping, followed by descriptions of the vegetation communities. In addition, Table 4-2 provides a summary using the Rough Step baseline. The overall Study Area (Project site and the proposed offsite conservation area) contains three native vegetation communities, including chaparral, Riversidean sage scrub, and southern mixed riparian, one non-native vegetation community

(non-native grassland), and disturbed/developed areas [Exhibit 6A – Vegetation Map]. Exhibit 6B provides the vegetation mapping from the 1994 MSHCP Rough Step baseline.

Table 4-1. Summary of Vegetation/Land Use Types for the Study Area (GLA 2020 Vegetation Mapping) [in acres]

Vegetation Community/ Land Use Type	Project Site	Offsite Conservation Parcel	Jack Rabbit Trail Easement	Total
Chaparral	1.73	0.15	0	**1.88**
Riversidean Sage Scrub	102.65	33.63	1.07	**137.35**
Southern Riparian Scrub	1.01	0.22	0	**1.23**
Non-Native Grassland	415.93	44.40	2.24	**462.56**
Disturbed	17.39	0	0.04	**17.43**
Developed	1.16	0	0.85	**2.01**
Total	**539.87**	**78.40**	**4.19**	**622.46**

Chaparral

Approximately 1.88 acres of chaparral occurs within the Study Area. This plant community is distinguishable from the Riversidean sage scrub due to the dominance of shrubs and trees rather than sub-shrubs, including sugar bush (***Rhus ovata***) and toyon (***Heteromeles arbutifolia***). Other evergreen shrubs include scrub oak (***Quercus berberidifolia***) and redberry buckthorn (***Rhamnus crocea***). Sage scrub species intermixed with the evergreen shrubs include black sage (***Salvia mellifera***) and California sagebrush (***Artemisia californica***). The understory is dominated with non-native grasses and summer forbs.

Riversidean Sage Scrub

The Study Area supports approximately 137.35 acres of Riversidean Sage Scrub, which more specifically is the Riversidean Sage Scrub subassociation, primarily along the southwestern boundary of the site, but also with scattered patches in the northeastern portion of the site. This plant community is comprised with a mosaic of dominant plant species, all of which are sub-shrubs, including California buckwheat (***Eriogonum fasciculatum***), California sagebrush, black sage, Palmer's goldenbush (***Ericameria palmeri***), and brittlebush (***Encelia farinosa***). Chaparral yucca (***Hesperoyucca whipplei***) and Mojave yucca (***Yucca schidigera***) also occur sporadically within this vegetation community.

Southern Riparian Scrub

The Study Area supports approximately 1.23 acres of southern riparian scrub, which occurs in several patches within canyons along the southwestern portion of the site. These areas are dominated with species including mule fat (***Baccharis salicifolia***), sand bar willow (***Salix exigua***), yellow willow (***Salix lutea***), western sycamore (***Platanus racemosa***), and narrowleaf cattail (***Typha domingensis***).

Non-Native Grassland
The majority of the Study Area, accounting for approximately 462.56 acres, consists of non-native grassland. This plant community is present throughout the site, primarily on flat and gentle-sloping areas within the northeastern portion of the Project site, adjacent to State Route 60, which was easily accessed by cattle during previous grazing practices. Non-native grassland species have also extended into the southwestern portion of the site due to the adjacent disturbance. These areas are dominated with non-native species such as foxtail brome (*Bromus madritensis*), ripgut grass (*Bromus diandrus*), slender oat (*Avena barbata*), Russian thistle (*Salsola tragus*), summer mustard (*Hirschfeldia incana*), and doveweed (*Croton setiger*). Other commonly occurring species in this vegetation community include common sandaster (*Corethrogyne filaginifolia*), prickly lettuce (*Lactuca serriola*), longstem buckwheat (*Eriogonum elongatum*), California buckwheat, deerweed (*Acmispon glaber*), stinknet (*Oncosiphon piluliferum*), tree tobacco (*Nicotiana glauca*), and common sunflower (*Helianthus annuus*). Scattered elderberry (*Sambucus nigra* ssp. *caerulea*) trees also occur sporadically throughout the non-native grassland community.

Disturbed
Disturbed areas account for 17.43 acres throughout the Study Area. This land use type consists of unpaved access roads which are scattered throughout the site, the majority of which occur within the linear northeastern portion of the Study Area, adjacent to State Route 60. Disturbed areas are generally devoid of vegetation; however, some ruderal species occur sporadically in these areas.

Developed
The existing Jack Rabbit Trail Road accounts for approximately 2.01 acres in the southernmost portion of the Study Area, dividing the proposed offsite conservation. This area is considered developed because it consists of a paved road and is devoid of vegetation.

Table 4-2. Summary of Vegetation/Land Use Types for the Study Area (1994 MSHCP Rough Step Vegetation Mapping) [in acres]

Vegetation Community/ Land Use Type	Project Site	Offsite Conservation Parcel	Jack Rabbit Trail Easement	Total
Chaparral	112.54	31.67	2.67	**156.88**
Riversidean Sage Scrub	143.91	46.73	1.52	**192.16**
Coast Live Oak Woodland	0.41	0	0	**0.41**
Non-Native Grassland	283.01	0	0	**283.01**
Total	**539.87**	**78.40**	**4.19**	**622.46**

4.2 Wildlife Movement

As discussed above in Section 3.1, the MSHCP identifies Proposed Core 3 as extending from northwest to southeast, which is bisected by SR-60. As such, the SR-60 provides a constraint to movement for wildlife through Proposed Core 3. *Volume I, Section 7.5.2* of the MSHCP provides guidelines for the construction of wildlife crossings associated with roadway projects. The MSHCP notes undercrossing structures of varying sizes should be included in a long road alignment to accommodate small, medium, and large wildlife, with multiple undercrossings for each size group depending on the length of the roadway. The California Department of Transportation (Caltrans) is currently constructing the SR-60 Truck Lanes Project which extends for approximately 4.75 miles from approximately Gilman Springs Road on the west to a point about one mile east of the western limits of the Project site. The Caltrans work is expected to be completed by the time that construction of the Beaumont Pointe Project would begin, so that certain Project components including proposed fencing would tie in consistently with the SR-60 improvements.

As part of the SR-60 improvements, Caltrans is constructing eight all-weather undercrossing structures specifically for wildlife, including two 20-foot-tall by 20-foot wide box culverts to accommodate larger wildlife (mule deer, mountain lion, and bobcat) and six smaller undercrossings. The smaller structures consist of a combination of corrugated metal pipes (CMPs), reinforced concrete pipes (RCPs) and arch concrete pipes (ACPs). Three of the eight undercrossings are being constructed for the section of the SR-60 improvements that abut the northern Project boundary, including one 60-inch pipe at the western end of the Project site, one of the 20-foot by 20-foot culverts approximately 0.50 mile along the Project boundary east of the 20-foot by 20-foot box culvert, and one 36-inch pipe another 0.50-mile to the east of the box culvert. Wildlife expected to occur at the Project site with the potential to use these three features include medium to large-sized mammals such as mule deer, mountain lion, bobcat and coyote, smaller mammals such as gray fox, raccoon and rodents, and other smaller wildlife such as reptiles and amphibians. The specific MSHCP Planning Species with a potential for using the culverts would be mountain lion, bobcat, Stephens' kangaroo rat, and Los Angeles pocket mouse. The remaining five Caltrans undercrossings are being constructed west of the Project site, with the second 20-foot by 20-foot culvert located approximately one-mile west of the Project site. Exhibit 9A depicts the locations of all eight of the proposed undercrossings associated with the SR-60 project.

As discussed above, the Project has been designed to pull back the western development edge to the maximum extent feasible in Cell 933 to provide a wildlife movement buffer relative to the 20-foot by 20-foot culvert that Caltrans constructed under the SR-60. In addition, the SR-60 improvements include a wildlife fence along both the northern and southern edges of the SR-60 to minimize wildlife from entering the roadway and direct wildlife to the areas north and south of the freeway. The eastern terminus of the SR-60 fence is being constructed just east of the proposed 36-inch pipe culvert [Exhibit 9B]. The proposed Beaumont Pointe Project will similarly construct a wildlife fence along the western and southern edges of the Project site to prevent wildlife from entering the Project site from the adjacent Conservation Area. The fence will be constructed approximately along the boundary between the proposed ARL and the Project's Maintained Open Space, although the exact location will vary depending on the

topography. The Project's fence will tie into the SR-60 fence at the easternmost proposed wildlife CMP and will extend west and then south/southeast around the Project to direct wildlife in the northwesterly/southeasterly direction. The wildlife fencing along the Project boundary will include one-way swing gates opening into the MSHCP conservation area for any wildlife that enter the Project site from the north and east trying to escape into the adjacent conserved lands. In addition to the wildlife fence, the Project will also include six-foot tubular steel security fencing along the northern boundary abutting the SR-60 ROW, beginning from the wildlife fence on the west and extending east to the Project's entry point. Wildlife that either cross over or under the SR-60 east of the Caltrans wildlife fence terminus will be forced to the west or east along the security fence. A swing gate will be installed to the west along the section of lateral (north-south) wildlife fence connecting to the SR-60 fence, allowing wildlife to escape the freeway ROW towards the Conservation Area. Details of the wildlife fence proposed for the Project will be provided as part of the Joint Project Review (JPR) process. As noted above, the Project's night lighting will be designed to prevent spillage into the MSHCP Conservation Area along the western and southern development boundary.

GLA biologists evaluated the Project site for wildlife movement, including data collection from the overall site in 2019 and a survey of existing culverts along the adjacent SR-60 in 2020. The 2019 study used a variety of methods, including remote cameras, incidental observations of wildlife, and documentation of scat and tracks, and roadkill detections. The results of the study indicated that the Project site provides live-in and/or local movement habitat for seven medium- to large-sized mammal species: bobcat, coyote, mule deer, American badger, raccoon, gray fox, and mountain lion. The 2018 study found that most of the unpaved roads within the site are utilized for movement, which extend through the ridges and canyons. While reviewing the SR-60 culverts, GLA biologists looked for signs of wildlife use (direct observation of animals, animal sign, presence of roadkill, and documented the condition of each culvert (dimensions, sight distance, and movement constraints). GLA documented a total of 18 culverts under the portion of the SR-60 adjacent to the Project site boundary. All of the existing culverts consisted of CMPs constructed to convey stormwater under the freeway and not specifically for wildlife use. The CMP sizes varied between 24 and 48-inches in diameter and those that were identified as having "line-of-sight" to the other side of the freeway were between 70 and 100-feet long. The majority of the culverts were heavily blocked by dried vegetation such as mustard and tumbleweed, which would deter relatively larger wildlife (medium-sized mammals) from using the CMPs. Small mammal scat and tracks were observed at two culverts and coyote scat was noted near one of the culverts, but it is unknown if coyote would use the small CMP culverts or would cross the roadway.

While it is acknowledged that some of the existing freeway culverts would be used by wildlife, and that other wildlife would cross the surface of the roadway, the MSHCP does not recognize a specific Existing or Proposed Linkage as crossing the freeway along the Project boundary or specifically through the middle of the Project site. Instead the focus of crossing is expected to be to west where middle of Proposed Core 3 is to be located. As noted on Exhibit 4A and 4B, the proposed Project site extends along the eastern edge of Proposed Core 3 and the lands described for conservation through the Cell Criteria are intended to support the management of that edge. The lands described for the Project site are not specifically intended to accommodate movement, although as noted above, the site supports the local movement of wildlife including the lateral

movement of wildlife into the adjacent badlands. Since the SR-60 Truck Lanes Project is to construct a 20-foot by 20-foot box culvert near the western end of the Beaumont Pointe Project site, the Beaumont Pointe Project will construct its wildlife fence at that location consistent with the terminus of the proposed SR-60 wildlife fence to maintain the Project's western/southwestern edge as the eastern limit for wildlife movement matching with the eastern edge of Proposed Core 3. As noted above, the Project will construct one-way swing gates along various parts of the fence, anticipating that wildlife may still enter the site from the north and east, and will need opportunities to connect to the Proposed Core 3 open space. The location of the 20-foot by 20-foot box culvert will coincide with the transition between the Project's Maintained Open Space and the proposed ARL. The topography of the manufactured slope extending down from the Project site will provide a barrier that is expected to direct wildlife either from the culvert to the south/southeast, or from the south/southeast to the culvert. At this location the Project's wildlife fence is expected to be constructed at the top of the manufactured slope to provide additional buffer between the developed portion of the Project and the culvert.

5.0 EQUIVALENCY ANALYSIS

The following provides an equivalency analysis of the proposed Criteria Refinement as it applies to the following:

- Effects on Habitats
- Effects on Covered Species
- Effects on Core Areas
- Effects on Linkages and Constrained Linkages
- Effects on Non-Contiguous Habitat Blocks
- Effects on MSHCP Conservation Area Configuration and Management
- Effects on Ecotones
- Acreage Contributed to the MSHCP Conservation Area
- Ownership of Mitigation Property

5.1 Effects on Habitats

This MSHCP defines Habitats as "the combination of environmental conditions of a specific place providing for the needs of a species or a population of such species." The term "habitat" is often synonymous with "vegetation community", although the intent of evaluating "effects on habitats" is to also address the functions and values associated with the vegetation communities in addition to demonstrating an equivalency with acreages conserved.

The MSHCP Cell Criteria identifies habitats/vegetation communities described for conservation to the benefit of various Covered Species present or with the potential to occur. The Criteria Cells associated with the Project site describe three Habitat types intended to be conserved throughout the Cells, including chaparral, coastal sage scrub, and grasslands. The habitat accounts described in Volume II, Section C of the MSHCP recognize two subassociations of grasslands (Valley and Foothill Grassland and Non-Native Grassland). The Project site and offsite conservation lands (offsite replacement) contain only non-native grasslands and do not

supports native grasslands (i.e., Valley and Foothill Grassland). As such, all reference to grasslands in this document pertain to Non-Native Grasslands. This section evaluates and compares the total amount of Habitats (vegetation communities) that are described for conservation by the Cell Criteria, including described areas to the conserved by the Project, described areas to be impacted by the Project, and areas proposed for conservation in replacement for the impacts. As required by the MSHCP, all lands to be proposed as replacement for impacts must not be described for conservation by the current Cell Criteria. The comparisons provided below address the vegetation mapping performed by GLA in 2020 as well as the MSHCP 1994 Rough Step vegetation baseline. The 2020 GLA mapping is being used to evaluate the actual impacts to vegetation communities (Habitats) described for conservation as a result of the proposed Project and to compare those impacts with undescribed lands proposed as replacement conservation. The purpose of using the 1994 Rough Step vegetation baseline is to demonstrate that the proposed Criteria Refinement would still satisfy the local Rough Step requirements for the described Habitats.

Included in the evaluation of the effects of the project on Habitats are those vegetation communities with the potential to support certain Covered Species, including those associated with the aforementioned chaparral, coastal sage scrub (Riversidean sage scrub), and grassland Habitats, as well as species associated with riparian/riverine areas, vernal pools and other ephemeral ponding features, and any other microhabitats that could be associated with the broader vegetation communities at the Project site.

5.1.1 Vegetation Communities to be Impacted and Conserved by the Project (GLA 2020 Vegetation Mapping)

Based on the conservation midpoint for the Criteria Cells (as depicted in Table 1-1), the MSHCP Criteria for Cells 933, 936, 1030, 1032, and 1125 describes approximately 206.89 acres of total conservation. Altogether the Project proposes to conserve 230.82 acres, including 152.42 acres onsite (97.20 acres of described lands and 55.22 acres of undescribed replacement lands) and 78.40 acres of offsite undescribed replacement lands. Of the 206.89 acres of lands described for conservation, approximately 109.69 acres would be impacted by the proposed Project, including 0.21 acre of chaparral, 24.40 acres of Riversidean sage scrub, and 82.13 acres of non-native grassland. In addition, the Project would impact 0.03 acre of southern riparian scrub, 2.78 acres of disturbed areas and 0.15 acre of developed areas associated with the existing Jack Rabbit Trail Road. To offset the impacts to described lands, the Project proposes to conserve approximately 133.62 acres of undescribed lands, including the 55.22 acres onsite and 78.40 acres offsite. The replacement lands include 0.32 acre of chaparral, 45.85 acres of Riversidean sage scrub, 86.01 acres of non-native grassland, 0.22 acre of southern riparian scrub, and 1.22 acres of disturbed areas. Table 5-1 provides a comparison of vegetation communities using GLA's 2020 vegetation mapping for the total lands described for conservation by the MSHCP and proposed to be impacted versus the total lands proposed for conservation by the Project.

Table 5-1. Comparison of Conservation Lands Described by the MSHCP and Project Proposed Conservation Lands (GLA 2020 Vegetation Mapping) [in acres]

			Proposed Conservation			
Vegetation Community	**Lands Described for Conservation**	**Described Conservation Lands to be Impacted**	**Onsite Described Lands to be Conserved**	**Onsite Undescribed Lands to be Conserved (Replacement)**	**Offsite Undescribed Lands to be Conserved (Replacement)**	**Total Proposed Conservation**
Chaparral	1.17	0.21	0.96	0.17	0.15	1.28
Riversidean Sage Scrub	56.70	24.40	32.30	12.22	33.63	78.15
Non-Native Grassland	144.38	82.13	62.25	41.61	44.40	148.26
Southern Riparian Scrub	1.01	0.03	0.98	0.00	0.22	1.20
Disturbed	3.48	2.78	0.70	1.22	0.00	1.92
Developed	0.15	0.15	0.00	0.00	0.00	0.00
Total	**206.89**	**109.69**	**97.20**	**55.22**	**78.40**	**230.82**

The 133.62 acres of proposed replacement lands include 33.72 acres in Cell 933, 0.17 acre in Cell 1030, 5.93 acres in Cell 1032, 37.89 acres in the eastern portion of Cell Group A', and 41.87 acres of lands that are outside of (but adjacent to) Criteria Cells (1.36 acres onsite and 40.51 acres offsite). Exhibit 5 identifies the areas described by the MSHCP Cell Criteria that would be impacted by the Project, as well as the areas proposed for replacement (onsite and offsite) and the remaining described areas that would be conserved by the Project. Exhibit 8A provides the 2020 vegetation mapping relative to the proposed impacts and conservation.

The Project would conserve a total of 79.43 acres of scrub vegetation (1.28 acres of chaparral and 78.15 acres of Riversidean sage scrub), which is an increase of 21.56 acres of total scrub vegetation versus what the MSHCP describes for conservation. The Project would result in a slight increase (3.88 acres) in non-native grassland conserved (148.26 acres of conservation versus 144.38 acres of described lands). However, as discussed below in Section 5.1.2, approval of the proposed Criteria Refinement associated with the Project, which is located in Rough Step Unit 2, would not cause Rough Step Unit 2 to become out of balance for any of the vegetation communities identified for this Rough Step Unit.

The 133.62 acres of proposed replacement lands will be at least equivalent in biological functions and values compared with the 109.69 acres of described lands to be impacted. Particularly the scrub communities (chaparral and Riversidean sage scrub) in the replacement lands have a similar species composition (native shrubs and forbs) and shrub cover/density compared with the described lands to be impacted, as well as a relative composition of non-native grasses and forbs. The grassland communities, in the context of their relative non-native species composition and disturbance level, is also similar when comparing the proposed

replacement lands with the described lands to be impacted. The replacement lands compared with the impacted lands will provide at least equivalent biological functions as it pertains to wildlife breeding, foraging, and dispersal. The replacement habitat provides at least equivalent opportunities for avian live-in habitat as well as for fossorial animals (reptiles and small mammals). Foraging opportunities are provided for herbivores as well as supporting predator/prey dynamics for insectivorous and carnivorous animals (reptiles, birds, and mammals).

5.1.2 Vegetation Communities to be Impacted and Conserved by the Project (1994 MSHCP Rough Step Vegetation Mapping)

Using the vegetation mapping from the 1994 MSHCP Rough Step baseline, the MSHCP Cell Criteria describes the following for conservation: chaparral (70.60 acres), Riversidean sage scrub (93.08 acres), and non-native grassland (43.20 acres). The proposed Project would impact 28.31 acres of chaparral, 44.62 acres of Riversidean sage scrub, and 36.76 acres of non-native grassland. In comparison, the Project would conserve 97.58 acres of chaparral (55.29 acres of replacement), 110.71 acres of Riversidean sage scrub (62.25 acres of replacement) and 22.53 acres of non-native grassland (16.09 acres of replacement). Table 5-2 provides a comparison of vegetation communities using GLA's 2020 vegetation mapping for the total lands described for conservation by the MSHCP versus the total lands proposed for conservation by the Project.

Table 5-2. Comparison of Conservation Lands Described by the MSHCP and Project Proposed Conservation Lands (MSHCP 1994 Rough Step Vegetation Mapping) [in acres]

			Proposed Conservation			
Vegetation Community	**Lands Described for Conservation**	**Described Conservation Lands to be Impacted**	**Onsite Described Lands to be Conserved**	**Onsite Undescribed Lands to be Conserved (Replacement)**	**Offsite Undescribed Lands to be Conserved (Replacement)**	**Total Proposed Conservation**
Chaparral	70.60	28.31	42.29	23.62	31.67	97.58
Riversidean Sage Scrub	93.08	44.62	48.46	15.52	46.73	110.71
Non-Native Grassland	43.20	36.76	6.44	16.09	0.00	22.53
Total	**206.89**	**109.69**	**97.20**	**55.22**	**78.40**	**230.82**

The proposed Criteria Refinement will conserve 97.58 acres of chaparral versus 70.60 acres described, for an increase of 26.98 acres, and 110.71 acres of Riversidean sage scrub versus 93.08 acres described, for an increase of 17.63 acres. The proposed Criteria Refinement would result in a decrease in non-native grassland conserved (22.53 acres versus 43.20 acres) based on the 1994 Rough Step mapping. However, approval of the proposed Criteria Refinement associated with the Project, which is located in Rough Step Unit 2, would not cause Rough Step

Unit 2 to become out of balance for any of the vegetation communities identified for this Rough Step Unit. Although the 2020 Annual Report has not been finalized, the remaining development allowance as of the end of 2020 in Rough Step Unit 2 are as follows: 2050.65 acres of coastal sage scrub, 2254.98 acres of grasslands, 36.27 acres of riparian scrub, woodland, and forest, 38.73 acres of Riversidean sage scrub and 58.14 acres of woodlands and forests. This unit remains in Rough Step for 2020. The Project will impact 28.31 acres of chaparral, 44.62 acres of Riversidean sage scrub, and 36.76 acres of non-native grassland. The Criteria Refinement proposes to conserve/replace 55.29 acres of chaparral, 62.25 acres of Riversidean sage scrub, and 16.09 acres of non-native grassland. Furthermore, based on the actual site conditions confirmed through GLA's 2020 vegetation mapping, the Project would conserve 148.26 acres of grassland (Table 5-1 above), which exceeds the amount described based on the Rough Step mapping.

5.1.3 MSHCP Riparian/Riverine Areas and Vernal Pools

MSHCP Volume I, Section 6.1.2 describes the process through which protection of riparian/riverine areas and vernal pools would occur within the MSHCP Plan Area.

Riparian/Riverine Areas

The MSHCP defines riparian/riverine areas as follows:

- *Lands which contain Habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year.*

The overall Study Area contains 3.80 acres of riparian/riverine areas, including 1.23 acres of riparian habitat (Southern Riparian Scrub) and 2.57 acres of unvegetated riverine areas consisting of ephemeral drainage features [Exhibit 7 – Riparian/Riverine Areas Map]. Of the 3.80-acre total, approximately 0.39 acre is within the described conservation areas to be impacted, 1.65 acres are within undescribed conservation (replacement) lands, and 1.70 acres within described lands to be conserved, with the remainder (0.06 acre) associated with the Project footprint outside of the Criteria Area. The riparian areas within the Project site and the offsite conservation (replacement) lands do not contain suitable habitat for species with survey requirements pursuant to MSHCP Section 6.1.2, including least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), as the riparian habitat lacks the appropriate vertical structure, density, width, and hydrology (for some species). The riverine areas are narrow, ephemeral drainage features that generally do not provide habitat for most Covered Species based on a combination of factors such as soil suitability, flow disturbance, and vegetation suitability. Furthermore, the unvegetated riverine features are not mapped as distinct vegetation communities, but instead as part of the surrounding scrub or grassland habitats. To that extent, the riverine areas are generally part of broader live-in habitats identified for certain Covered Species discussed below in Section 5.2, but the specific riverine features do not provide unique habitat opportunities for the Covered Species.

The overall Project will impact 0.42 acre of riparian/riverine areas, including 0.03 acre of riparian habitat and 0.39 acre of unvegetated streambed. Impacts to riparian/riverine areas will require approval through the Determination of Biologically Equivalent or Superior Preservation (DBESP) process, including mitigation to offset the loss of functions and values associated with the resources. The intended mitigation would consist of the purchasing of wetland/riparian habitat establishment and/or rehabilitation credits from an approved mitigation bank/in-lieu fee program at an acceptable ratio (minimum 1:1) to establish that with mitigation, the Project would be equivalent or superior to the existing condition.

Vernal Pools

The MSHCP defines vernal pools as follows:

- *Seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season. Obligate hydrophytes and facultative wetlands plant species are normally dominant during the wetter portion of the growing season, while upland species (annuals) may be dominant during the drier portion of the growing season. The determination that an area exhibits vernal pool characteristics, and the definition of the watershed supporting vernal pool hydrology, must be made on a case-by-case basis. Such determinations should consider the length of the time the area exhibits upland and wetland characteristics and the manner in which the area fits into the overall ecological system as a wetland. Evidence concerning the persistence of an area's wetness can be obtained from its history, vegetation, soils, and drainage characteristics, uses to which it has been subjected, and weather and hydrologic records.*

The Project site does not contain vernal pools. The site does not contain any depressions (natural or artificial) that would inundate long enough to support resources associated with vernal pools and based on the overall badland topography of much of the site, the topography generally does not exist to support vernal pools. The soils mapped within the site are categorized as sandy loam soils, which are generally not associated with vernal pools, and direct observations of the soils within the site showed a lack of clay soil components that would restrict water from draining down into the subsoil. Furthermore, many of the dirt roads at the site are utilized for operations and maintenance of various utilities (i.e., Southern California Edison transmission towers and a SoCal Gas transmission pipeline), and as such artificial features such vehicle tire ruts that can, over time, develop characteristics of vernal pools, do not occur at the Project site. In addition, no plants were observed within the Project site that are associated with vernal pools and similar habitats that experience prolonged inundation.

Fairy Shrimp

Through Section 6.1.2, the MSHCP requires surveys for three species of fairy shrimp where suitable habitat is present, including the vernal pool fairy shrimp (***Branchinecta lynchi***), Riverside fairy shrimp (***Streptocephalus woottonii***), and the Santa Rosa Plateau fairy shrimp

(*Linderiella santarosae*). In assessing the presence of potential habitat for fairy shrimp, the MSHCP states the following:

- *For Riverside, vernal pool and Santa Rosa fairy shrimp, mapping of stock ponds, ephemeral pools and other features shall also be undertaken as determined appropriate by a qualified biologist.*

The Project site does not contain any depression features that support inundation for fairy shrimp, including the above-referenced species. As noted above for vernal pools, the site does not contain any depressions (natural or artificial) that would inundate long enough to support fairy shrimp and based on the overall badland topography of much of the site, the topography generally does not exist to support such features. The soils mapped within the site are categorized as sandy loam soils, which are generally not associated with vernal pools, and direct observations of the soils within the site showed a lack of clay soil components that would restrict water from draining down into the subsoil. Furthermore, many of the dirt roads at the site are utilized for operations and maintenance of various utilities (i.e., Southern California Edison transmission towers and a SoCal Gas transmission pipeline), and as such artificial features such vehicle tire ruts that might support fairy shrimp, do not occur at the Project site.

5.2 Effects on Covered Species

This section of the Criteria Refinement Analysis evaluates the effects of the Criteria Refinement on Covered Species, including the focal Planning Species for the relevant Criteria Cells, and additional Covered Species that have been detected at the Project site or have the potential to occur.

5.2.1 Planning Species

Section 3.2.3 of the MSHCP identifies the following Planning Species for Proposed Core 3: southern California rufous-crowned sparrow, Bell's sage sparrow, cactus wren, loggerhead shrike, San Bernardino kangaroo rat, Stephens' kangaroo rat, bobcat, Los Angeles pocket mouse, mountain lion, and Nevin's barberry. The proposed Criteria Refinement will support those species with a potential to occur at the Project site. The following analysis discusses the Planning Species that do or do not have a potential to occur at the site and compares the lands described for conservation by the MSHCP versus what will be conserved by the Project and how the proposed conservation of land under this analysis supports each species, as applicable. Maps depicting live-in habitat for scrub and grassland species are provided as Exhibits 8A and 8B.

Southern California Rufous-Crowned Sparrow

The southern California rufous-crowned sparrow has a potential to occur at the Project site. MSHCP objectives for the rufous-crowned sparrow include the conservation of primary habitat (Riversidean sage scrub, Riversidean alluvial fan sage scrub, and desert scrubs) and secondary habitat (grassland and chaparral) in the Riverside Lowland, Santa Ana Mountains, and San Jacinto Foothills Bioregions.

Approximately 202.25 acres of the onsite lands described for conservation by the MSHCP Cell Criteria contains habitats with the potential to support the rufous-crowned sparrow, including chaparral, Riversidean sage scrub, and grassland. From the vegetation acreages provided in Table 5-1 above, the Project will impact approximately 106.74 acres of the described habitats but will conserve 132.18 acres of lands in replacement supporting the described habitats, including 54.00 acres onsite and 78.18 acres offsite. In addition, the Project will conserve the remaining 95.51 acres of onsite lands described by the Cell Criteria, suitable to support the rufous-crowned sparrow. Altogether the Project will conserve 227.69 acres of live-in habitat (149.51 acres onsite and 78.18 acres offsite), including 132.18 acres of undescribed lands (replacement) to offset impacts to 106.74 acres of described lands. The proposed replacement lands are at least equivalent to the impacted lands in terms of habitat quality to support functions and values such as nesting, foraging, and dispersal. The live-in habitat in the proposed replacement lands is of at least equivalent quality in terms of native plant species composition, cover and density, and the relative composition of non-native plant species. As such, the proposed Criteria Refinement would be at least equivalent compared with the current Cell Criteria as it pertains to live-in habitat for the rufous-crowned sparrow. Table 5-3 summarizes the comparison of live-in habitat for the lands described for conservation versus the lands proposed for conservation by the Project.

Table 5-3. Comparison of Live-In Habitat for the Southern California Rufous-Crowned Sparrow [in acres]

			Proposed Conservation			
Vegetation Community	**Lands Described for Conservation**	**Described Conservation Lands to be Impacted**	**Onsite Described Lands to be Conserved**	**Onsite Undescribed Lands to be Conserved (Replacement)**	**Offsite Undescribed Lands to be Conserved (Replacement)**	**Total Proposed Conservation**
Chaparral	1.17	0.21	0.96	0.17	0.15	1.28
Riversidean Sage Scrub	56.70	24.40	32.30	12.22	33.63	78.15
Non-Native Grassland	144.38	82.13	62.25	41.61	44.40	148.26
Total	**202.25**	**106.74**	**95.51**	**54.00**	**78.18**	**227.69**

Bell's Sage Sparrow

The Bell's sage sparrow has a potential to occur at the Project site. MSHCP objectives for the sage sparrow include the conservation of suitable habitat (Riversidean sage scrub, chaparral, and desert scrubs) in the Riverside lowland, Santa Ana Mountains, Desert Transition, and San Jacinto foothills Bioregions.

Approximately 57.87 acres of the onsite lands described for conservation by the MSHCP Cell Criteria contains habitats with the potential to support the Bell's sage sparrow, including chaparral and Riversidean sage scrub. From the vegetation acreages provided in Table 5-1

above, the Project will impact approximately 24.61 acres of the described habitats but will conserve 46.17 acres of lands in replacement supporting the described habitats, including 12.39 acres onsite and 33.78 acres offsite. In addition, the Project will conserve the remaining onsite lands described by the Cell Criteria, which includes 33.26 acres of chaparral and Riversidean sage scrub habitats suitable to support the Bell's sage sparrow. Altogether the Project will conserve 79.43 acres of live-in habitat (45.65 acres onsite and 33.78 acres offsite), including 46.17 acres of undescribed lands (replacement) to offset impacts to 24.61 acres of described lands. The proposed replacement lands are at least equivalent to the impacted lands in terms of habitat quality to support functions and values such as nesting, foraging, and dispersal. The live-in habitat in the proposed replacement lands is of at least equivalent quality in terms of native plant species composition, cover and density, and the relative composition of non-native plant species. As such, the proposed Criteria Refinement would be at least equivalent compared with the current Cell Criteria as it pertains to live-in habitat for the Bell's sage sparrow. Table 5-4 summarizes the comparison of live-in habitat for the lands described for conservation versus the lands proposed for conservation by the Project.

Table 5-4. Comparison of Live-In Habitat for Bell's Sage Sparrow [in acres]

			Proposed Conservation			
Vegetation Community	**Lands Described for Conservation**	**Described Conservation Lands to be Impacted**	**Onsite Described Lands to be Conserved**	**Onsite Undescribed Lands to be Conserved (Replacement)**	**Offsite Undescribed Lands to be Conserved (Replacement)**	**Total Proposed Conservation**
Chaparral	1.17	0.21	0.96	0.17	0.15	1.28
Riversidean Sage Scrub	56.70	24.40	32.30	12.22	33.63	78.15
Total	**57.87**	**24.61**	**33.26**	**12.39**	**33.78**	**79.43**

Cactus Wren

MSHCP objectives for the cactus wren include the conservation of suitable habitat (desert scrub, Riversidean alluvial fan sage scrub, and Riversidean sage scrub) within the Riverside Lowland and San Jacinto Foothill Bioregions, with an objective to conserve micro-habitat (i.e. cactus patches) to support nesting. The Project site does not contain cactus scrub and therefore does not contain the micro-habitat needed to support breeding cactus wrens. As such, the Project site is generally not expected to provide live-in habitat for the cactus wren. However, the Project site contains Riversidean sage scrub and, with its location at the edge of Proposed Core 3, the Project site could support the dispersal of cactus wrens through the Core from the standpoint that shrubs could provide temporary shelter, and the scrub/grassland habitats could provide foraging opportunities for dispersing cactus wrens. In this context, the Project would impact 24.61 acres of scrub habitats described for conservation versus 46.17 acres of undescribed (replacement) lands supporting scrub habitats, with the replacement scrub being at least equivalent in terms of overall quality (native species composition, density and cover, and the relative quantity of non-native species). Therefore, the proposed Criteria Refinement would at least be equivalent in the

context of potential cactus wren dispersal habitat compared with the conservation of lands as described by the current Cell Criteria.

Loggerhead Shrike

The loggerhead shrike has a potential to occur at the Project site. MSHCP objectives for the loggerhead shrike include the conservation of suitable foraging and nesting habitat including agriculture, grassland, cismontane alkali marsh, playa and vernal pool, desert scrubs, Riversidean alluvial fan sage scrub, Riversidean sage scrub, peninsular juniper woodland and scrub, riparian scrub, woodland and forest, and oak woodlands and forest.

Approximately 202.25 acres of the onsite lands described for conservation by the MSHCP Cell Criteria contains habitats with the potential to support the loggerhead shrike, including chaparral, Riversidean sage scrub, and grassland. From the vegetation acreages provided in Table 5-1 above, the Project will impact approximately 106.74 acres of the described habitats but will conserve 132.18 acres of lands in replacement supporting the described habitats, including 54.00 acres onsite and 78.18 acres offsite. In addition, the Project will conserve the remaining 95.51 acres of onsite lands described by the Cell Criteria, suitable to support the loggerhead shrike. Altogether the Project will conserve 227.69 acres of live-in habitat (149.51 acres onsite and 78.18 acres offsite), including 132.18 acres of undescribed lands (replacement) to offset impacts to 106.74 acres of described lands. The proposed replacement lands are at least equivalent to the impacted lands in terms of habitat quality to support functions and values such as nesting, foraging, and dispersal. The live-in habitat in the proposed replacement lands is of at least equivalent quality in terms of native plant species composition, cover and density, and the relative composition of non-native plant species. As such, the proposed Criteria Refinement would be at least equivalent compared with the current Cell Criteria as it pertains to live-in habitat for the loggerhead shrike. Table 5-5 summarizes the comparison of live-in habitat for the lands described for conservation versus the lands proposed for conservation by the Project.

Table 5-5. Comparison of Live-In Habitat for the Loggerhead Shrike [in acres]

			Proposed Conservation			
Vegetation Community	**Lands Described for Conservation**	**Described Conservation Lands to be Impacted**	**Onsite Described Lands to be Conserved**	**Onsite Undescribed Lands to be Conserved (Replacement)**	**Offsite Undescribed Lands to be Conserved (Replacement)**	**Total Proposed Conservation**
Chaparral	1.17	0.21	0.96	0.17	0.15	1.28
Riversidean Sage Scrub	56.70	24.40	32.30	12.22	33.63	78.15
Non-Native Grassland	144.38	82.13	62.25	41.61	44.40	148.26
Total	**202.25**	**106.74**	**95.51**	**54.00**	**78.18**	**227.69**

San Bernardino Kangaroo Rat

The San Bernardino kangaroo rat (SBKR) does not occur at the Project site due to a lack of suitable habitat and is not considered as a Planning Species for the portion of Proposed Core 3 corresponding to the Project site. Furthermore, the Project is not located within the MSHCP survey area for SBKR and is not required to address SBKR on a project-specific level. As such, the Criteria Refinement would not affect the SBKR.

Stephens' Kangaroo Rat

The Stephens' kangaroo rat (SKR) has a potential to occur at the Project site. The Project site is located just outside of the SKR Habitat Conservation Plan (SKR HCP) and so coverage would be applied through the MSHCP. The MSHCP identifies two "biological issues and considerations" addressing SKR for The Pass Area Plan, including 1) Conserve Potrero Creek and associated alluvial fan sage scrub for maintenance of key species such as the Stephens' kangaroo rat, Los Angeles pocket mouse and arroyo toad; and 2) Maintain Core Area in Potrero Valley for Stephens' kangaroo rat. The Reche Canyon/Badlands Area Plan has one biological issue/consideration for SKR: Maintain linkage area to San Jacinto Wildlife Area for Stephens' kangaroo rat. The Project site is not associated with these areas and therefore these "biological issues and considerations" are not applicable to the Project. As such, the Criteria Refinement would not affect the SKR in the context of the stated goals. Regardless, the Project will conserve 148.26 acres of grassland habitat (103.86 acres onsite and 44.40 acres offsite), versus 144.38 acres described by the MSHCP Cell Criteria. The Project will impact 82.13 acres of grassland habitat described for conservation but will conserve 86.01 acres of grassland in replacement (41.61 acres on site and 44.40 acres offsite), in addition to the remaining grassland habitat (62.25 acres) that is described by the Cell Criteria.

Los Angeles Pocket Mouse

The Los Angeles pocket mouse (LAPM) might have a very low potential for occurrence at the Project site, but generally is not expected to occur due to a lack of habitat suitability. The MSHCP identifies as a "biological issue and consideration for both The Pass Area Plan and Reche Canyon/Badlands Area Plan to "determine presence of potential Core Area for Los Angeles pocket mouse in San Timoteo Creek and tributaries and Badlands." However, the Project site is located just outside of the MSHCP survey area for LAPM and is not expected to address LAPM on a project-specific level. Furthermore, the lands described by Cell Criteria for the Project site are concentrated in the upslope areas and ridgelines that are not suitable habitat for LAPM. As such, the Criteria Refinement would not affect the LAPM.

Bobcat

As discussed above, bobcat was confirmed present at the Project site during the biological studies (tracks observed and remote camera detection). The Project site represents live-in habitat for the bobcat as well as to support local movement through the site. Both the Reche Canyon/Badlands Area Plan and The Pass Area Plan includes a biological issue and consideration to maintain a Core Area for bobcat. The proposed conservation lands and

configuration will support the bobcat in a manner equivalent to the lands described by the Cell Criteria.

Regarding live-in habitat, approximately 206.74 acres of the onsite lands described for conservation by the MSHCP Cell Criteria represents live-in habitat for bobcats, including chaparral, Riversidean sage scrub, grassland, and riparian scrub, as well as disturbed areas (dirt roads) that facilitate local movement. As summarized in Table 5-6 below, the Project will impact approximately 109.55 acres of potential live-in habitat but will conserve 133.62 acres of lands in replacement supporting the described habitats, including 55.22 acres onsite and 78.40 acres offsite. In addition, the Project will conserve the remaining onsite lands described by the Cell Criteria, which includes 97.20 acres of potential live-in habitat. Altogether the Project will conserve 230.82 acres of live-in habitat (152.42 acres onsite and 78.40 acres offsite), including 133.62 acres of undescribed lands (replacement) to offset impacts to 109.55 acres of described lands. The proposed replacement lands are at least equivalent to the impacted lands in terms of habitat quality to support functions and values such as breeding, foraging, and movement. The live-in habitat in the proposed replacement lands is of at least equivalent quality in terms of native plant species composition, cover and density, and the relative composition of non-native plant species. As such, the proposed Criteria Refinement would be at least equivalent compared with the current Cell Criteria as it pertains to live-in habitat for the bobcat.

Table 5-6. Comparison of Live-In Habitat for the Bobcat [in acres]

			Proposed Conservation			
Vegetation Community	**Lands Described for Conservation**	**Described Conservation Lands to be Impacted**	**Onsite Described Lands to be Conserved**	**Onsite Undescribed Lands to be Conserved (Replacement)**	**Offsite Undescribed Lands to be Conserved (Replacement)**	**Total Proposed Conservation**
Chaparral	1.17	0.21	0.96	0	0.15	1.28
Riversidean Sage Scrub	56.70	24.40	32.30	12.22	33.63	78.15
Non-Native Grassland	144.38	82.13	62.25	41.61	44.4	148.26
Southern Riparian Scrub	1.01	0.03	0.98	0	0.22	1.2
Disturbed	3.48	2.78	0.70	1.22	0	1.92
Total	**206.74**	**109.55**	**97.20**	**55.22**	**78.40**	**230.82**

Regarding wildlife movement, the described conservation within the Project site would add to edge of Proposed Core 3, which overall is to support bobcat movement. Since specific linkages have not been identified through the portion of the Project site proposed for development, the majority of the Project site is not critical for bobcat movement to support the Proposed Core 3 goals. As such, the critical aspect of conservation at the Project site is the configuration of open

space along the southeastern edge so that movement is accommodated without Project-related edge effects interfering with the movement goals for Proposed Core 3. As discussed above, the Project will construct wildlife fencing to complement fencing to be constructed as part of the SR-60 improvements. The Project fencing will connect to SR-60 fencing that will extend to the easternmost wildlife crossings to be constructed by Caltrans at the western end of the Beaumont Pointe Project site. The Project fencing will extend along the western and southwestern boundary of the Project site and will include one-way swing gates that will allow any bobcats entering the site from the north and east to exist the Project site into the adjacent conserved lands associated with Proposed Core 3. The Criteria Refinement will support the goals for bobcat in an equivalent manner to the existing Cell Criteria.

Mountain Lion

As discussed above, the mountain lion was confirmed using the Project site during the biological studies (tracks observed). The Project site is considered part of a broader territory for mountain lions and support the local movement through the badlands. Two "biological issues and considerations" are identified for The Pass Area Plan relating to the mountain lion, including 1) maintain large blocks of habitat for large mammal movement between the northern and southern sections of the San Bernardino National Forest, and 2) maintain Core and Linkage habitat for mountain lion. The latter is also identified for the Reche Canyon/Badlands Area Plan.

The proposed Criteria Refinement will support the goals for mountain lion by conserving lands that will expand the edge of Proposed Core 3 in a manner that is consistent with the conservation identified by the Cell Criteria. Similar to the bobcat, approximately 206.74 acres of the onsite lands described for conservation by the MSHCP Cell Criteria represents live-in habitat for the mountain lion, including chaparral, Riversidean sage scrub, grassland, riparian scrub, and disturbed areas (dirt roads) that facilitate local movement. As summarized below in Table 5-7, the Project will impact approximately 109.55 acres of potential live-in habitat but will conserve 133.62 acres of lands in replacement supporting the described habitats, including 55.22 acres onsite and 78.40 acres offsite. In addition, the Project will conserve the remaining onsite lands described by the Cell Criteria, which includes 97.20 acres of potential live-in habitat for the mountain lion. Altogether the Project will conserve 230.82 acres of live-in habitat (152.42 acres onsite and 78.40 acres offsite), including 133.62 acres of undescribed lands (replacement) to offset impacts to 109.55 acres of described lands. The proposed replacement lands are at least equivalent to the impacted lands in terms of habitat quality to support functions and values such as breeding, foraging, and movement. The live-in habitat in the proposed replacement lands is of at least equivalent quality in terms of native plant species composition, cover and density, and the relative composition of non-native plant species. As such, the proposed Criteria Refinement would be at least equivalent compared with the current Cell Criteria as it pertains to live-in habitat for the mountain lion.

Table 5-7. Comparison of Live-In Habitat for the Mountain Lion [in acres]

			Proposed Conservation			
Vegetation Community	**Lands Described for Conservation**	**Described Conservation Lands to be Impacted**	**Onsite Described Lands to be Conserved**	**Onsite Undescribed Lands to be Conserved (Replacement)**	**Offsite Undescribed Lands to be Conserved (Replacement)**	**Total Proposed Conservation**
Chaparral	1.17	0.21	0.96	0	0.15	1.28
Riversidean Sage Scrub	56.70	24.40	32.30	12.22	33.63	78.15
Non-Native Grassland	144.38	82.13	62.25	41.61	44.4	148.26
Southern Riparian Scrub	1.01	0.03	0.98	0	0.22	1.2
Disturbed	3.48	2.78	0.70	1.22	0	1.92
Total	**206.74**	**109.55**	**97.20**	**55.22**	**78.40**	**230.82**

Regarding wildlife movement, the described conservation within the Project site would add to edge of Proposed Core 3, which overall is to support mountain lion movement. Since specific linkages have not been identified through the portion of the Project site proposed for development, the majority of the Project site is not critical for mountain lion movement to support the Proposed Core 3 goals. As such, the critical aspect of conservation at the Project site is the configuration of open space along the southeastern edge so that movement is accommodated without Project-related edge effects interfering with the movement goals for Proposed Core 3. As discussed above, the Project will construct wildlife fencing to complement fencing to be constructed as part of the SR-60 improvements. The Project fencing will connect to SR-60 fencing that will extend to the easternmost wildlife crossings to be constructed by Caltrans at the western end of the Beaumont Pointe Project site. The Project fencing will extend along the western and southwestern boundary of the Project site and will include one-way swing gates that will allow mountain lions entering the site from the north and east to exist the Project site into the adjacent conserved lands associated with Proposed Core 3. The Criteria Refinement will support the goals for the mountain lion in an equivalent manner to the existing Cell Criteria.

Nevin's Barberry

Nevin's barberry was not detected at the Project site during focused plant surveys and is not expected to occur due to a lack of suitable habitat. Nevin's barberry is not considered as a Planning Species for the portion of Proposed Core 3 corresponding to the Project site. Furthermore, the Project is not located within the MSHCP survey area for Nevin's barberry and is not required to address the species on a project-specific level. As such, the Criteria Refinement would not affect Nevin's barberry.

5.2.2 Other Covered Species

In addition to those Covered Species specifically addressed for the Pass Area Plan and the Reche Canyon/Badlands Area Plan, i.e., the Planning Species addressed above in Section 5.2.1, the MSHCP identifies other Covered Species for which habitat assessments/surveys are required based on a Project site's occurrence in one or more designated survey areas and/or based on the presence of suitable habitat. These include Narrow Endemic Plant Species (MSHCP *Volume I, Section 6.1.3*), as identified by the Narrow Endemic Plant Species Survey Areas (NEPSSA); Criteria Area Plant Species (MSHCP *Volume I, Section 6.3.2*) identified by the Criteria Area Plant Species Survey Areas (CAPSSA); animals species (burrowing owl, mammals, amphibians) identified by survey areas (MSHCP *Volume I, Section 6.3.2*); and the aforementioned species associated with riparian/riverine areas and vernal pool habitats, i.e., least Bell's vireo, southwestern willow flycatcher, western yellow-billed cuckoo, and designated fairy shrimp (MSHCP *Volume I, Section 6.1.2*).

Section 6.1.2 Species

As discussed above in Section 5.1.3 of this document, *MSHCP Volume I, Section 6.1.2* describes the process through which protection of riparian/riverine areas and vernal pools would occur within the MSHCP Plan Area. The MSHCP requires surveys for least Bell's vireo, southwestern willow flycatcher, western yellow-billed cuckoo, vernal pool fairy shrimp, Riverside fairy shrimp, and Santa Rosa Plateau fairy shrimp is suitable habitat is present. However, as noted above the Project site and offsite conservation (replacement) lands do not contain suitable habitat for these species. As such, the undescribed lands to be conserved in replacement for the described lands to be impacted (i.e., the proposed Criteria Refinement) would not have an effect (positive or negative) on the *Section 6.1.2* species compared with conservation that would occur following the existing Cell Criteria.

In addition to the above referenced species, *Section 6.1.2* identifies other species that are to be protected through the implementation of the *Section 6.1.2* procedures, including the following:

- **Amphibians –** arroyo toad, mountain yellow-legged frog, California red-legged frog
- **Birds –** bald eagle, peregrine falcon
- **Fish** – Santa Ana sucker
- **Plants –** Brand's phacelia, California Orcutt grass, California black walnut, Coulter's matilija poppy, Engelmann oak, Fish's milkwort, graceful tarplant, lemon lily, Mojave tarplant, mud nama, ocellated Humboldt lily, Orcutt's brodiaea, Parish's meadowfoam, prostrate navarretia, San Diego button-celery, San Jacinto Valley crownscale, San Miguel savory, Santa Ana River woolly-star, slender-horned spine flower, smooth tarplant, spreading navarretia, thread-leaved brodiaea, vernal barley

The Project site does not contain suitable habitat for any of the above-referenced species, and therefore these species are not relevant to the proposed Criteria Refinement, i.e., the proposed Criteria Refinement would not have an effect (positive or negative) on the *Section 6.1.2* species compared with conservation that would occur based on the existing Cell Criteria.

Section 6.1.3 Species

Volume I, Section 6.1.3 of the MSHCP requires that within identified Narrow Endemic Plant Species Survey Areas (NEPSSA), site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. The Project site is located within the NEPSSA 8, which addresses the following species: many-stemmed dudleya (*Dudley multicaulis*) and Yucaipa onion (*Allium marvinii*). Focused plant surveys were conducted for the Project site in April and May 2020. No special-status plants were detected during the surveys, including any of the *Section 6.1.3* species. As such, the *Section 6.1.3* species are not relevant to the proposed Criteria Refinement, i.e., the proposed Criteria Refinement would not have an effect (positive or negative) on the *Section 6.1.3* species compared with conservation that would occur following the existing Cell Criteria.

Section 6.3.2 Species

In addition to the species identified through *Section 6.1.2* and *Section 6.1.3* of the MSHCP, Section 6.3.2 identifies additional species to be addressed for individual projects based on the occurrence in one or more survey areas, including the Criteria Area Plant Species Survey Area (CAPSSA), burrowing owl survey area, amphibian survey areas (arroyo toad, California red-legged frog and mountain yellow-legged frog) and mammal survey areas (Aguanga kangaroo rat, San Bernardino kangaroo rat and Los Angeles pocket mouse). The Project site is within the burrowing owl survey area but is not within the CAPSSA or any of the amphibian or mammal survey areas.

The Project site contains potentially suitable habitat for the burrowing owl (*Athene cunicularia*), including the presence of suitable burrows. However, focused burrowing owl surveys were conducted in July and August 2019, and no burrowing owls were detected at the site. Regarding the *Section 6.3.2* amphibian species, the Project site does not support the arroyo toad, California red-legged frog and mountain yellow-legged frog due to the lack of suitable habitat. Regarding the *Section 6.3.2* mammal species, the Project site does not contain suitable habitat for the Aguanga kangaroo rat or the San Bernardino kangaroo rat. As noted above in Section 5.1.2, the Los Angeles pocket mouse might have a very low potential for occurrence at the Project site, but generally is not expected to occur due to a lack of habitat suitability.

In summary, the *Section 6.3.2* species are not relevant to the proposed Criteria Refinement, i.e., the proposed Criteria Refinement would not have an effect (positive or negative) on the *Section 6.1.3* species compared with conservation that would occur following the existing Cell Criteria.

Other MSHCP Covered Species

The Project site has a potential to support other MSHCP Covered Species that are not identified as Planning Species for the Pass Area Plan or the Reche Canyon/Badlands Area Plan, and do not have project-specific conservation requirements such as pursuant to *Section 6.1.2, 6.1.3, or 6.3.2.* These include the coast horned lizard, coast patch-nosed snake, coastal whiptail, red-diamond rattlesnake (detected at the site), coastal California gnatcatcher, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and San Diego desert woodrat. These species would

utilize similar live-in habitats (scrub and grasslands) as discussed above for species such as the rufous-crowned sparrow and loggerhead shrike. As noted above, the Project will conserve 227.69 acres of scrub and grassland habitats (149.51 acres onsite and 78.18 acres offsite), including 132.18 acres of undescribed lands (replacement) to offset impacts to 106.74 acres of described lands. The proposed replacement lands are at least equivalent to the impacted lands in terms of habitat quality to support functions and values such as breeding, foraging, and dispersal. The live-in habitat in the proposed replacement lands is of at least equivalent quality in terms of native plant species composition, cover and density, and the relative composition of non-native plant species. As such, the proposed Criteria Refinement would be at least equivalent compared with the current Cell Criteria as it pertains to live-in habitat for these species.

5.3 Effects on Core Areas

The MSHCP defines a "Core" as a "block of Habitat of appropriate size, configuration, and vegetation characteristics to generally support the life history requirements of one or more Covered Species." The proposed Criteria Refinement will support the assembly of Proposed Core 3 in a manner consistent with the existing Cell Criteria. As depicted in Exhibit 4, the Project site is located at the edge of Proposed Core 3 and the intent of conserved lands at the Project site is to expand the edge of Proposed Core 3. As presented above in Section 5.1, the Project will impact 109.69 acres of lands described for conservation by the MSHCP Cell Criteria. The Project will offset those impacts with 133.62 acres of replacement lands that are not described by the Cell Criteria, including 55.22 acres onsite and 78.40 acres offsite (See Table 5-8 below). In addition, the Project will conserve the remaining 97.20 acres of onsite lands described by the Cell Criteria, for a combined conservation area of 230.82 acres, compared with a total of 206.89 acres described by the MSHCP. The Project's onsite conservation includes 151.06 acres within the Criteria Area (Cells 933, 936, 1030, 1032, and 1125) and 1.36 acres onsite that are not part of a Criteria Cell (but adjacent to Cells). Of the offsite lands, approximately 37.89 acres are in Cell 1125 of Cell Group A', and 40.51 acres are not a part of a Criteria Cell but are adjacent to Cell Group A'. Although the Project does not achieve minimum described acreage for some of the individual Cells, the Project proposes an overall greater amount of conservation than is described, including the expansion of conservation to the northwest and the southeast into undescribed lands that will extend the conserved edge. The conservation of undescribed lands in the northwestern portion of Cell 933 will extend conservation to SR-60 to link up with the undercrossing constructed as part of the freeway improvements.

Table 5-8. Comparison of Described Conservation Lands to be Impacted and Proposed Replacement Lands for Proposed Core 3 [in acres]

			Proposed Conservation			
Vegetation Community	**Lands Described for Conservation**	**Described Conservation Lands to be Impacted**	**Onsite Described Lands to be Conserved**	**Onsite Undescribed Lands to be Conserved (Replacement)**	**Offsite Undescribed Lands to be Conserved (Replacement)**	**Total Proposed Conservation**
Chaparral	1.17	0.21	0.96	0.17	0.15	1.28
Riversidean Sage Scrub	56.70	24.40	32.30	12.22	33.63	78.15
Non-Native Grassland	144.38	82.13	62.25	41.61	44.40	148.26
Southern Riparian Scrub	1.01	0.03	0.98	0.00	0.22	1.20
Disturbed	3.48	2.78	0.70	1.22	0.00	1.92
Developed	0.15	0.15	0.00	0.00	0.00	0.00
Total	**206.89**	**109.69**	**97.20**	**55.22**	**78.40**	**230.82**

5.4 Effects on Linkages and Constrained Linkages

The Project site is not associated with a Linkage or a Constrained Linkage, instead the Project is associated with the edge of Proposed Core 3 and the proposed conservation would expand the edge of Proposed Core 3 consistent with the intent of the existing Cell Criteria. Although Proposed Core 3 does not represent a specific Linkage, Proposed Core 3 is a very large Core that in addition to providing extensive live-in habitat also facilitates the movement of wildlife to connect to existing Cores and other habitat areas to the northwest, southwest, and southeast. Other Linkages connect to Proposed Core 3, but these do not coincide with the Project site. As described above in Section 5.1 (and Section 5.3) the Project will impact 109.69 acres of lands described for conservation by the MSHCP Cell Criteria. However, the Project will conserve 133.62 acres of lands in replacement that are not described for conservation by the MSHCP, including 55.22 acres onsite and 78.40 acres offsite. As noted above, the onsite replacement lands include the northwestern portion of Cell 933 that is important to connect the conservation area to SR-60 where Caltrans is constructing undercrossings (including a 20-foot-by-20-foot culvert) as part of the Caltrans freeway improvements (depicted on Exhibits 9A and 9B). As referenced above in Section 1.0 of this document, the Wildlife Agency comment letter noted that the 20-foot-by-20-foot culvert was constructed to enable large mammal movement between the interior of the Proposed Core 3 and the area north of SR-60 and the San Bernardino National Forest. The comment letter further noted the importance of maintaining a wide enough canyon to the west of the development footprint to allow appropriate topography for wildlife movement and to allow for an appropriate buffer from the proposed development to minimize edge effects. In consideration of these comments and the stated importance of the wildlife undercrossing, the development footprint has been revised to pull back farther from the undercrossing and canyon

in order to further facilitate movement. The proposed revisions will increase the conservation in Cell 933 by just over 19 acres, for a total of 68.84 acres in the Cell, including 47.03 acres of the Cell that are currently undescribed for conservation by the Cell Criteria that will connect areas described for conservation with the SR-60 wildlife undercrossing. As acknowledged by the Wildlife Agencies this undescribed area is important to maintain the wildlife connection.

The offsite lands include a portion of Cell Group A' (37.89 acres) that is not described for conservation and approximately 40.51 acres of undescribed lands south of Cell Group A' that is outside of the Criteria Area but that includes native scrub habitat that would extend the conservation across Jack Rabbit Trail to the southeast. As discussed above, the Project will support the movement of wildlife through Proposed Core 3 by constructing a wildlife fence that will be consistent with fencing to be constructed as part of SR-60 improvements. The Project fencing will connect with SR-60 fencing at the location of wildlife undercrossings being constructed by Caltrans. The Project fencing will extend along the western and southwestern boundaries of the Project site to maintain the eastern edge of Proposed Core 3 along the Project's development boundary. The proposed fencing will support movement through Proposed Core 3 by preventing wildlife from entering the development footprint from the Conserved Lands and direct wildlife to move around and way from the Project site.

5.5 Effects on Non-Contiguous Habitat Blocks

The MSHCP defines a "Non-Contiguous Habitat Block" as a "block of Habitat not connected to other Habitat areas via a Linkage or Constrained Linkage." The proposed Criteria Refinement will not affect any Non-Contiguous Habitat Blocks, as none are associated with the Project site or directly associated with Proposed Core 3.

5.6 Effects on MSHCP Conservation Area Configuration and Management

The existing Cell Criteria corresponding to the Project site describes lands that would expand the eastern edge of Proposed Core 3. Based on the amount of lands described by the Criteria and the locations within the Cells, the Criteria allows for the development of lands at the Project site between the edge of Proposed Core 3 and SR-60. The proposed Criteria Refinement would allow a larger (wider) area to be developed by the Project, but the resulting amount of edge (perimeter) would be similar to that which would be allowed with the existing Criteria. The proposed Project will construct pads that will slope down to the Conservation Area to the west and southwest and slope up to the south to ridges on the edge of badlands. As noted above, a wildlife fence would be constructed along the entire western and southwestern edge of the Project's disturbance footprint demarcating the proposed Conservation Area. The configuration of the proposed Project edge along with the fence will assist in the management of the adjacent conserved lands by providing access to the open space and a minimized edge to maintain. One or more gates will be constructed along the fence allowing access from the Project site to the open space. Regarding the fenced edge, to the extent feasible the final open space edge and corresponding fence will be configured to minimize the amount of edge/perimeter to be managed. Furthermore, the Project will provide the RCA with access to the proposed Conservation Area limits at different locations, including vehicle access to a small area of conservation associated with Cell 936.

5.7 Effects on Ecotones

Ecotones are defined by the MSHCP as areas of adjoining vegetation communities generally characterized by greater biological diversity. Ecotones are transitional areas between two different vegetation communities where in the area of overlap between the two communities there is often greater biological diversity since the transitional areas exhibits aspects of both communities. An example of an ecotonal area is a grassland community transitioning a scrub community. As described above in Section 5.1.2 (and summarized in Table 5-2), the 1994 vegetation mapping data used for the MSHCP Rough Step baseline identified grassland areas abutting a contiguous block of scrub habitat (Riversidean sage scrub and chaparral) [Exhibit 8B], creating the appearance of a distinct ecotonal area where one community transitions to the other. However, in actuality the site consists predominately of grassland habitat with patches of scrub vegetation (mainly Riversidean sage scrub) occurring in the upslope areas intermixed amongst the grassland habitat [Exhibit 8A]. Areas that were mapped for the 1994 baseline as Riversidean sage scrub area mostly grassland, and areas mapped as chaparral are mostly Riversidean sage scrub. As such, the scattering of scrub "islands" in a broader "sea" of grassland does not provide the typical ecotonal effect as is represented with one community transitioning to another along a defined community boundary. However, where the grassland "sea" meets the scrub "islands", an ecotonal effect may occur on a micro-scale.

The Project proposes to impact 106.74 acres of described lands supporting grassland and scrub habitats, including 0.21 acre of chaparral, 24.40 acres of Riversidean sage scrub, and 82.13 acres of grassland. In replacement for these impacts, the Project proposes to conserve 132.18 acres of undescribed lands in a similar patchy configuration/distribution as with the described lands, containing 0.32 acre of chaparral, 45.85 acres of Riversidean sage scrub, and 86.01 acres of grasslands. In that context, the proposed Criteria Refinement through the replacement conservation lands, including in the northwestern corner of Cell 933 (onsite) and the proposed offsite conservation, will provide at least an equivalent distribution of scrub patches intermixed with the surrounding grasslands compared with the lands described for conservation by the current Cell Criteria, and in doing so will maintain the degree of diversity where the grassland and scrub communities overlap.

5.8 Acreage Contributed to the MSHCP Conservation Area

The MSHCP requires for Criteria Refinements that projects contribute an equal or greater acreage to the Conservation Area compared with impacts proposed by projects. As summarized above in Table 5-1, the Project proposes to conserve 133.62 acres of undescribed lands in replacement for impacts to 109.69 acres described for conservation by the Criteria for Cells 933, 936, 1030, 1032, and 1125. Overall, the Project would conserve 230.82 acres compared with 206.89 acres described by the Cell Criteria [Exhibit 5], resulting in a greater amount of conservation compared with the existing Criteria. In addition to the greater amount of lands to be conserved by the Project, and based on the discussion above in Effects on Habitats (Section 5.1) and Effects on Covered Species (Section 5.2), the proposed replacement lands are of an equivalent or higher quality than the lands to be impacted. Therefore, approval of the Criteria Refinement would result in superior preservation of lands that will contribute to the MSHCP Conservation Area.

5.9 Ownership of Mitigation Property

The MSHCP requires for Criteria Refinements that project applicants have control over lands to be used as replacement (i.e., for mitigation) for described conservation lands to be impacted by the Project. The Applicant for the Beaumont Pointe Specific Plan proposes to conserve 230.82 acres of lands, including 133.62 acres of undescribed lands as replacement for impacts to 109.69 acres described for conservation by the Cell Criteria. The 133.62 acres of replacement lands include 55.22 acres onsite, and 78.40 acres of offsite lands that are contiguous with the onsite conserved lands. The Project will conserve an additional 97.20 acres of onsite lands described by the Cell Criteria, that combined with the 133.62 acres of replacement lands provide the 230.82 acres to be conserved overall by the Project. The Applicant owns all lands to be conserved, including the 133.62 acres of undescribed lands proposed to replace the 109.69 acres of described to be impacted.

6.0 CONCLUSION

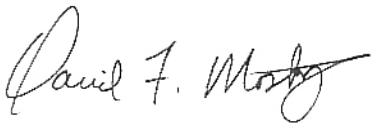
Volume I, Section 6.5 (Criteria Refinement Process [CRP]) of the MSHCP states that individual public and private projects within the Plan Area are expected to be designed and implemented in accordance with the Criteria for each Area Plan presented in *Volume I, Section 3.2* of the MSHCP document. In cases where refinements to the Criteria are desirable to facilitate Reserve Assembly, resulting in adjustments to the Criteria, the CRP described in *Volume I, Section 6.5* shall apply. Such Criteria Refinements may involve changes to Cores and Linkages as long as it is demonstrated that the Refinements would clearly benefit Covered Species and would be consistent with MSHCP policies and species conservation goals. Furthermore, the CRP cannot be used for Criteria changes that would result in reductions in the Criteria Area.

As demonstrated above in Section 3.0, the proposed Project would conserve lands in a configuration that is overall consistent with the intent of the existing Cell Criteria and would collectively conserve an amount of land (230.82 acres) within The Pass Area Plan and the Reche Canyon/Badlands Area Plan that meets the mid-range of conservation identified by the Cell Criteria. As demonstrated in Section 5.1, the Project will conserve an equivalent amount of the described vegetation communities (Riversidean sage scrub, chaparral, and non-native grassland) compared with the existing Cell Criteria, including proposed undescribed (replacement) lands to offset impacts to described lands. As demonstrated in Section 5.2, the proposed conservation will support the applicable Covered Species in the manner intended along the edge of Proposed Core 3. As discussed above, the Project has been designed to pull back the western development edge to the maximum extent feasible in Cell 933 to provide a wildlife movement buffer relative to the 20-foot by 20-foot culvert that Caltrans constructed under the SR-60. In addition, the Project will construct a wildlife fence along the western and southwestern boundary of the site that will be connect to and be consistent with fencing proposed along SR-60 as part of the freeway improvements by Caltrans. The Project fencing will connect with SR-60 fencing where Caltrans has constructed new undercrossings specifically to accommodate wildlife, for the collective purpose of managing wildlife movement along the edge of Proposed Core 3. Overall, the proposed Criteria Refinement would support the Reserve Assembly goals for Proposed Core 3 consistent with intent of the existing Cell Criteria for independent Cells 933, 936, 1030, 1032

and 1125 (The Pass Area Plan) and Cell Group A' (Reche Canyon/Badlands Area Plan), and the conservation proposed by the Criteria Refinement would at least be equivalent to the conservation intended based on the current Cell Criteria.

7.0 CERTIFICATION

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.



SIGNED:_____ DATE: 9/2/22

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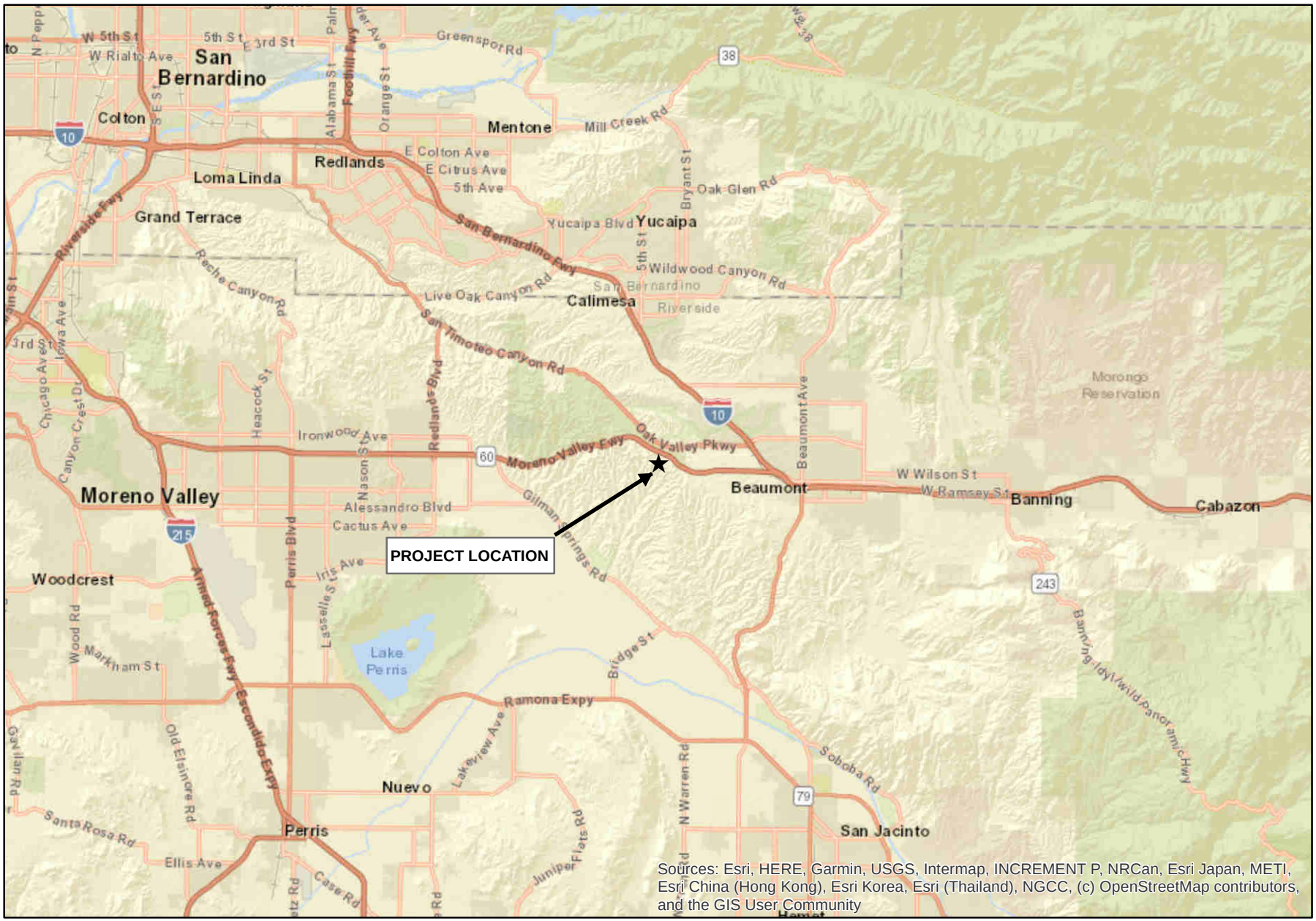
Source: ESRI World Street Map



N

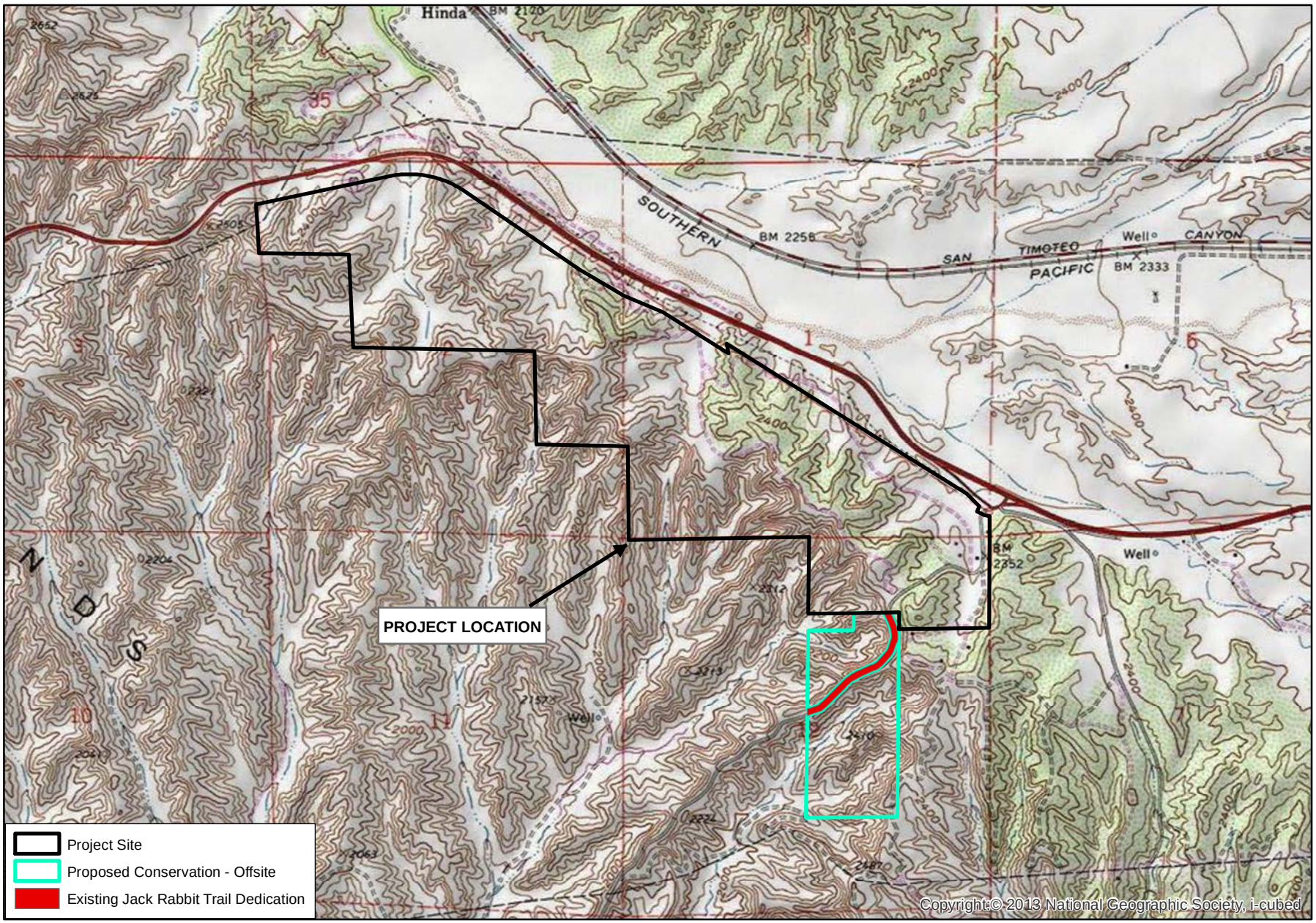
0 2 4 8 Miles

BEAUMONT POINTE

Regional Map

GLENN LUKOS ASSOCIATES

Exhibit 1



Adapted from USGS El Casco, CA quadrangle

N

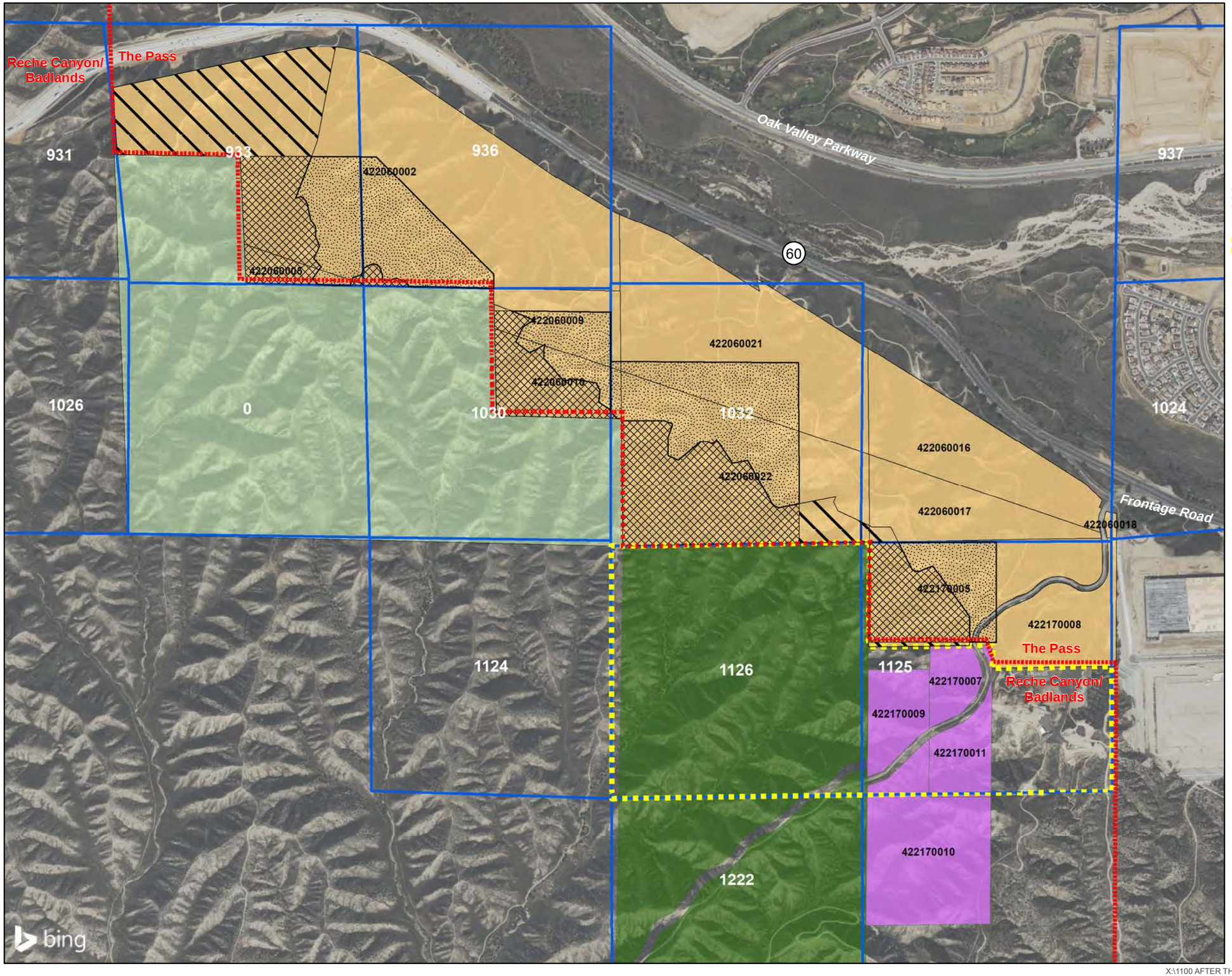
0 1,000 2,000 4,000 Feet

BEAUMONT POINTE

Vicinity Map

GLENN LUKOS ASSOCIATES

Exhibit 2A



- Area Plan Boundary
- Criteria Cells
- Cell Group A'
- PQP Conserved Lands
- RCA MSHCP Conserved Lands
- Onsite Parcels
- Undescribed Lands – Offsite Replacement (78.40 ac.)
- Described Lands - Impact (109.69 ac.)
- Described Lands - Proposed Conservation (97.20 ac.)
- Undescribed Lands - Onsite Replacement (55.22 ac.)

The boundaries for Described Conservation represent an approximation of the MSHCP described midrange goal as applicable for each Criteria Cell.

N

0 550 1,100 2,200

Feet

1 inch = 1,000 feet

BEAUMONT POINTE

Assessor's Parcel Map

GLENN LUKOS ASSOCIATES

Exhibit 2B

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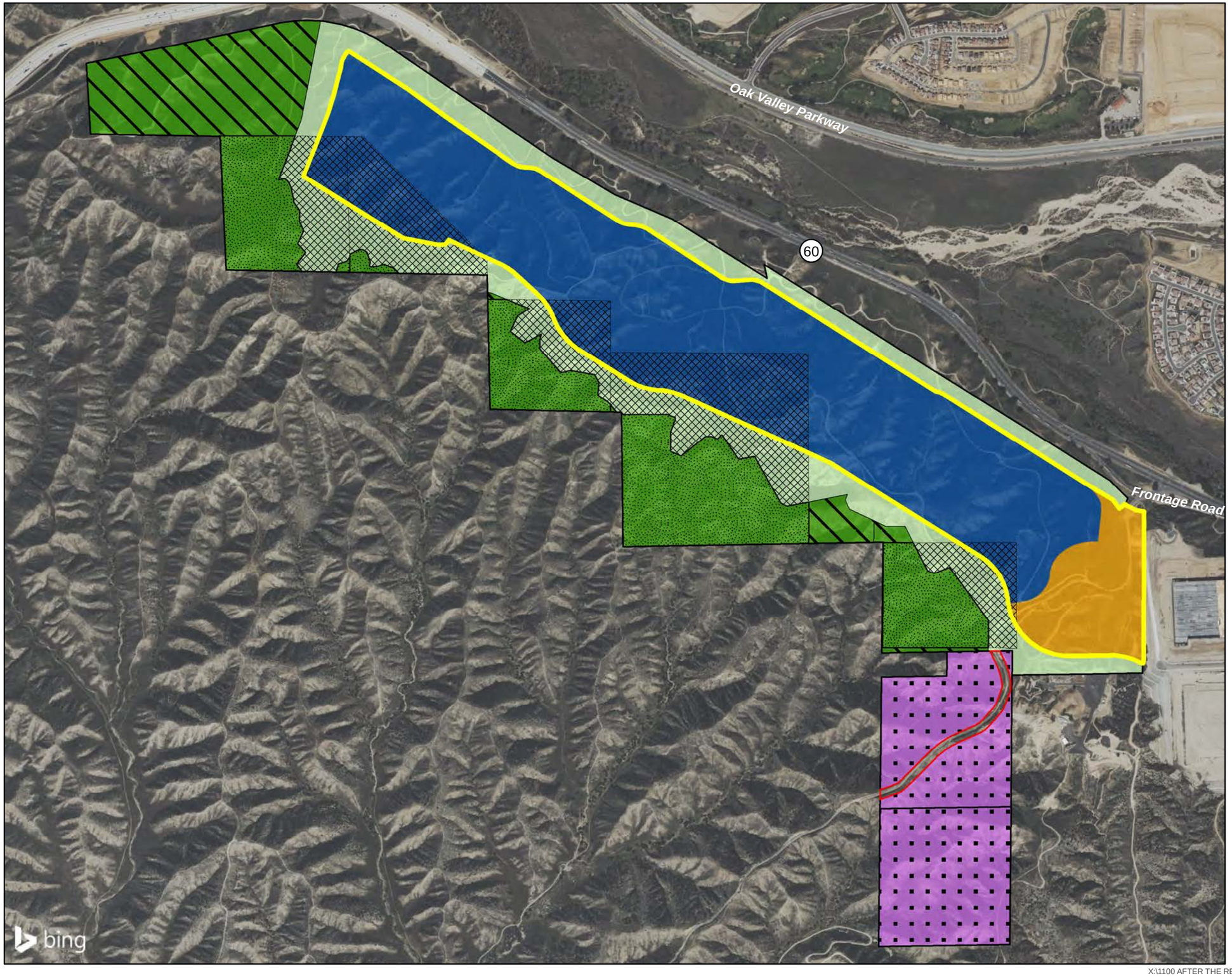

- Project Site
- Existing Jack Rabbit Trail Dedication (4.19 ac.)
- Fuel Modification Limits
- Described Lands - Impact (109.69 ac.)
- Described Lands - Proposed Conservation (97.20 ac.)
- Undescribed Lands - Onsite Replacement (55.22 ac.)
- Undescribed Lands - Offsite Replacement (78.40 ac.)
- Industrial
- General Commercial
- Project Maintained Open Space
- Proposed MSHCP Conservation (Onsite) (152.42 ac.)
- Proposed MSHCP Conservation (Offsite) (78.40 ac.)

The boundaries for Described Conservation represent an approximation of the MSHCP described midrange goal as applicable for each Criteria Cell.

N

0 475 950 1,900

Feet

1 inch = 950 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 23, 2022

BEAUMONT POINTE

Site Plan Map

GLENN LUKOS ASSOCIATES

Exhibit 3

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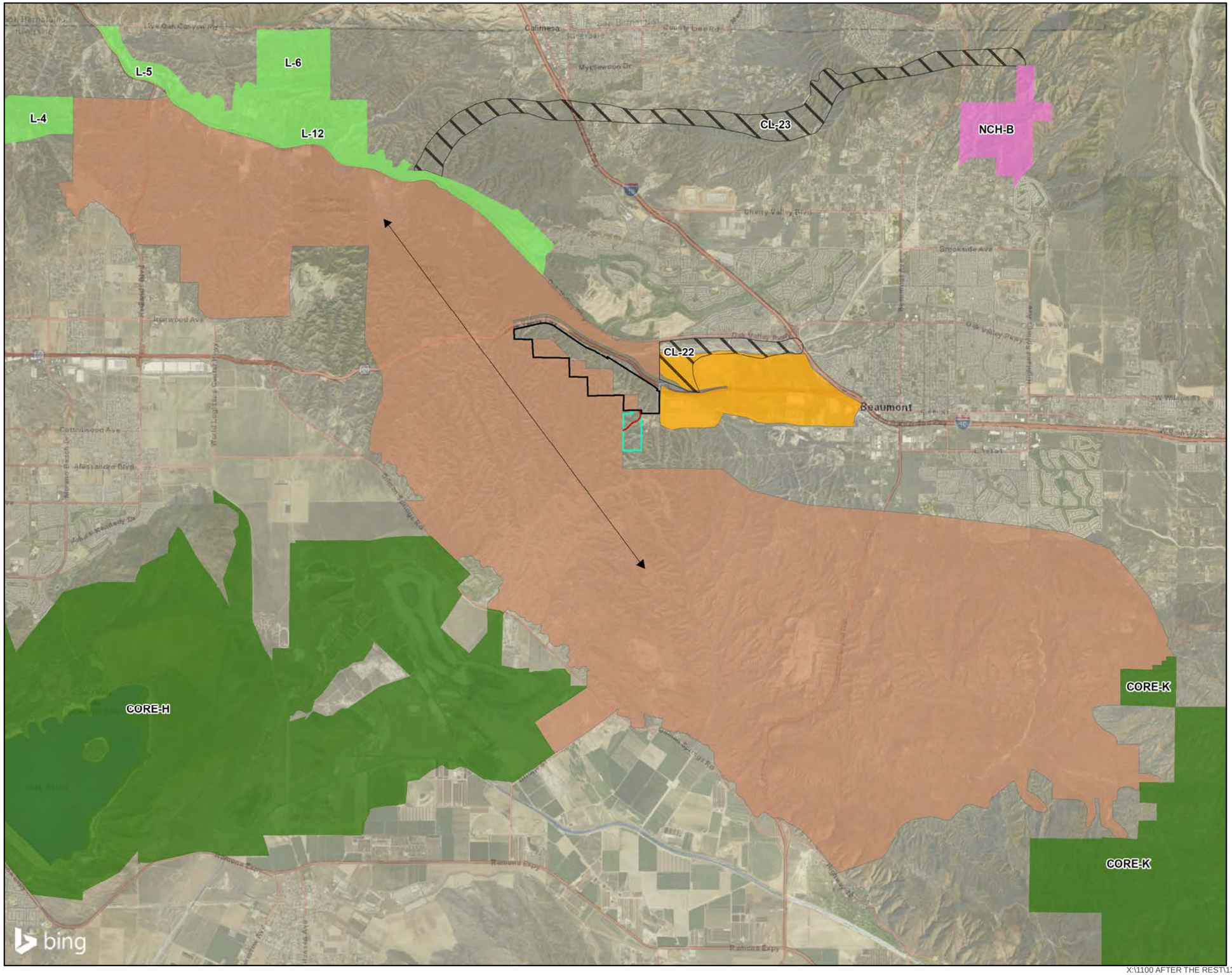

- Project Site
- Proposed MSHCP Conservation (Offsite)
- Existing Jack Rabbit Trail Dedication
- Existing/Planned Developments
- Proposed Core 3 (Approximate)
- Existing Core
- Linkage
- Non-Contiguous Habitat Block
- Constrained Linkage
- General Direction of Wildlife Movement

N

0 3,450 6,900 13,800

Feet

1 inch = 6,900 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 29, 2022

BEAUMONT POINTE

Proposed Core 3 Map

GLENN LUKOS ASSOCIATES

Exhibit 4A

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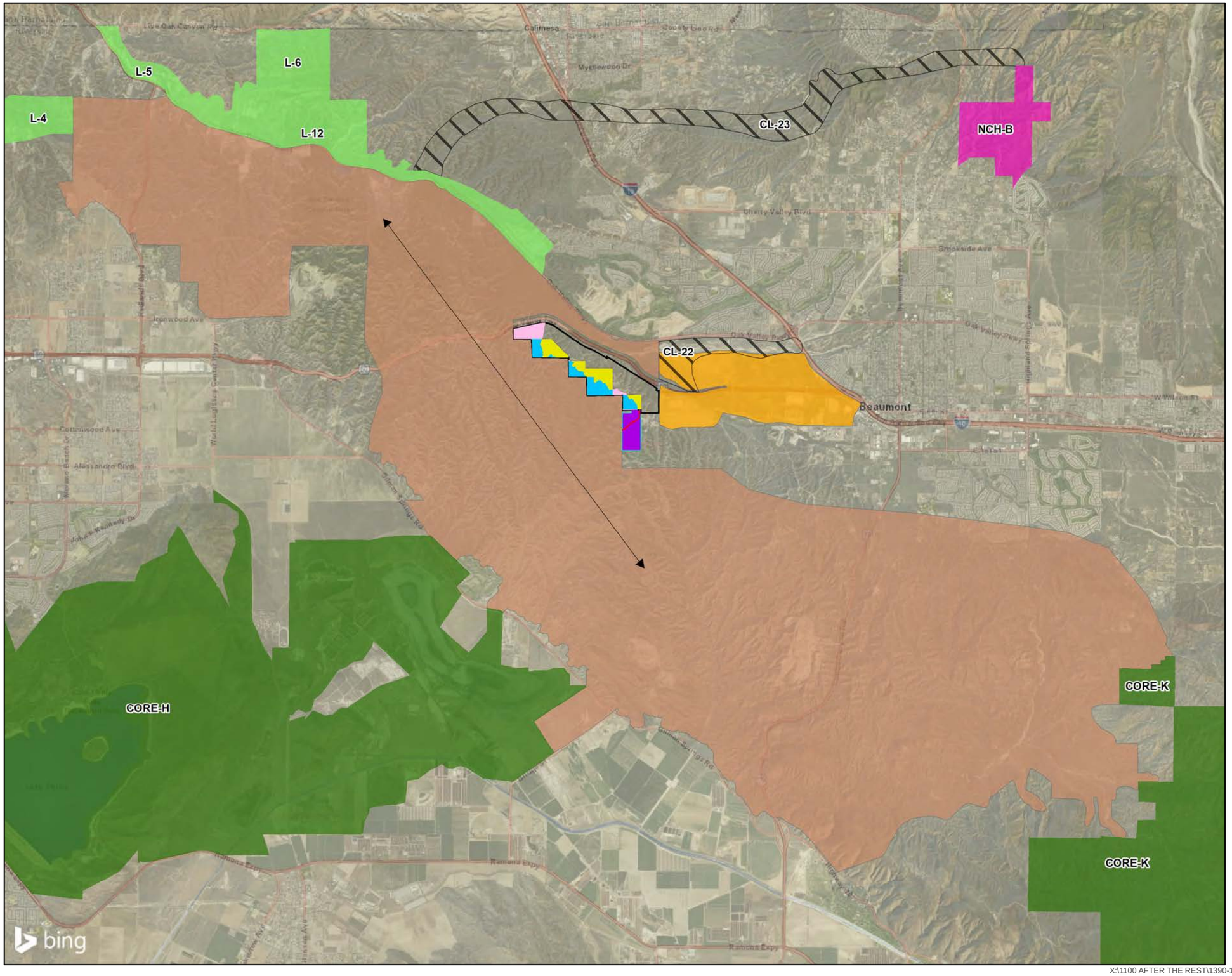

- Project Site
- Proposed MSHCP Conservation (Offsite)
- Existing Jack Rabbit Trail Dedication
- Described Lands - Impact (109.69 ac.)
- Described Lands - Proposed Conservation (97.20 ac.)
- Undescribed Lands - Onsite Replacement (55.22 ac.)
- Undescribed Lands - Offsite Replacement (78.40 ac.)
- Existing/Planned Developments
- Proposed Core 3 (Approximate)
- Existing Core
- Linkage
- Non-Contiguous Habitat Block
- Constrained Linkage
- General Direction of Wildlife Movement

N

0 3,450 6,900 13,800

Feet

1 inch = 6,900 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 23, 2022

BEAUMONT POINTE

Proposed Criteria Refinement

GLENN LUKOS ASSOCIATES

Exhibit 4B

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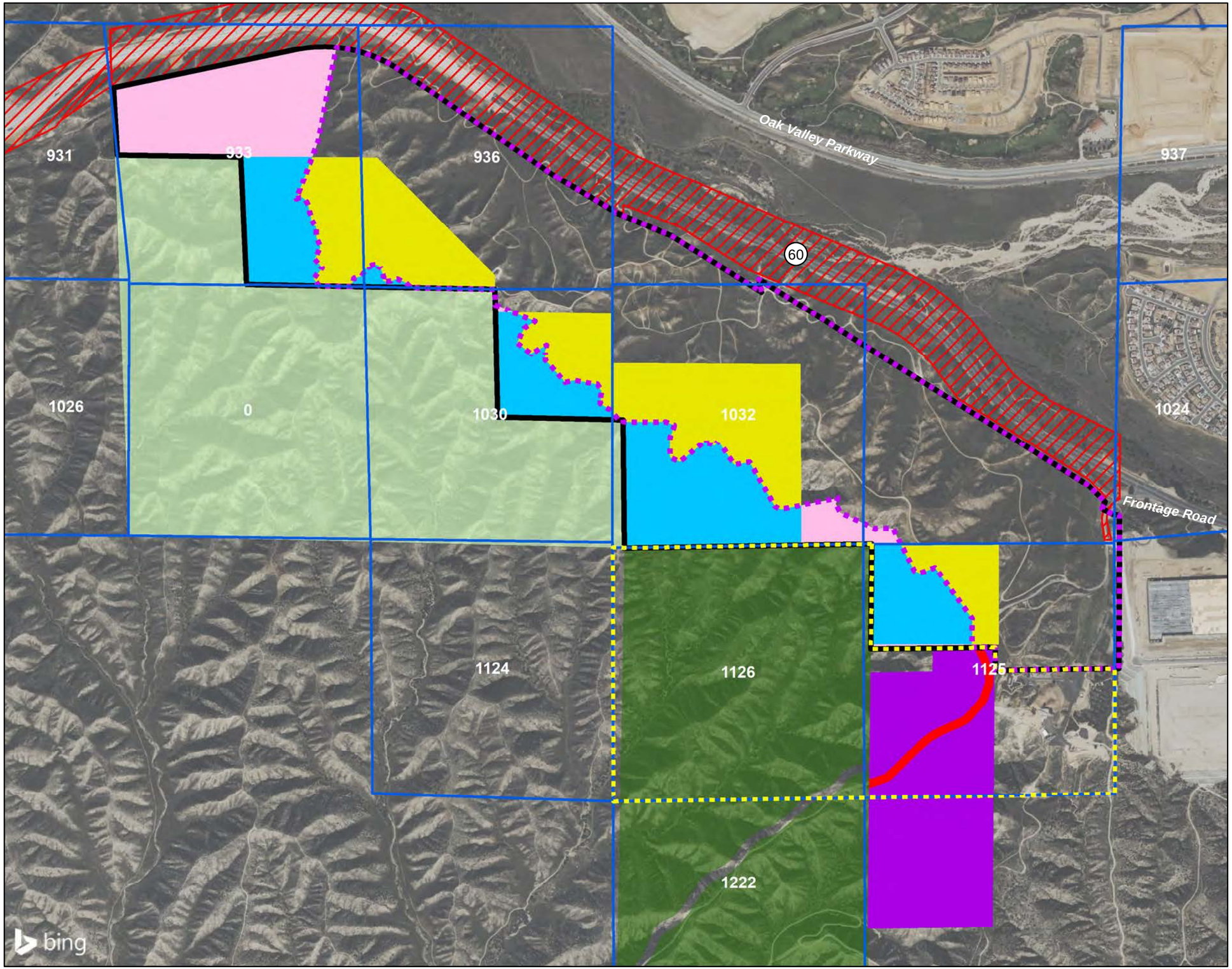

- Project Site
- Existing Jack Rabbit Trail Dedication (4.19 ac.)
- Proposed Impact Footprint
- 60 Freeway Easement
- Cell Group A'
- Criteria Cells
- PQP Conserved Lands
- RCA MSHCP Conserved Lands
- Described Lands - Impact (109.69 ac.)
- Described Lands - Proposed Conservation (97.20 ac.)
- Undescribed Lands - Onsite Replacement (55.22 ac.)
- Undescribed Lands - Offsite Replacement (78.40 ac.)

The boundaries for Described Conservation represent an approximation of the MSHCP described midrange goal as applicable for each Criteria Cell.

N

0 550 1,100 2,200
Feet

1 inch = 1,000 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 23, 2022

BEAUMONT POINTE

Reserve Assembly Analysis Map

GLENN LUKOS ASSOCIATES

Exhibit 5

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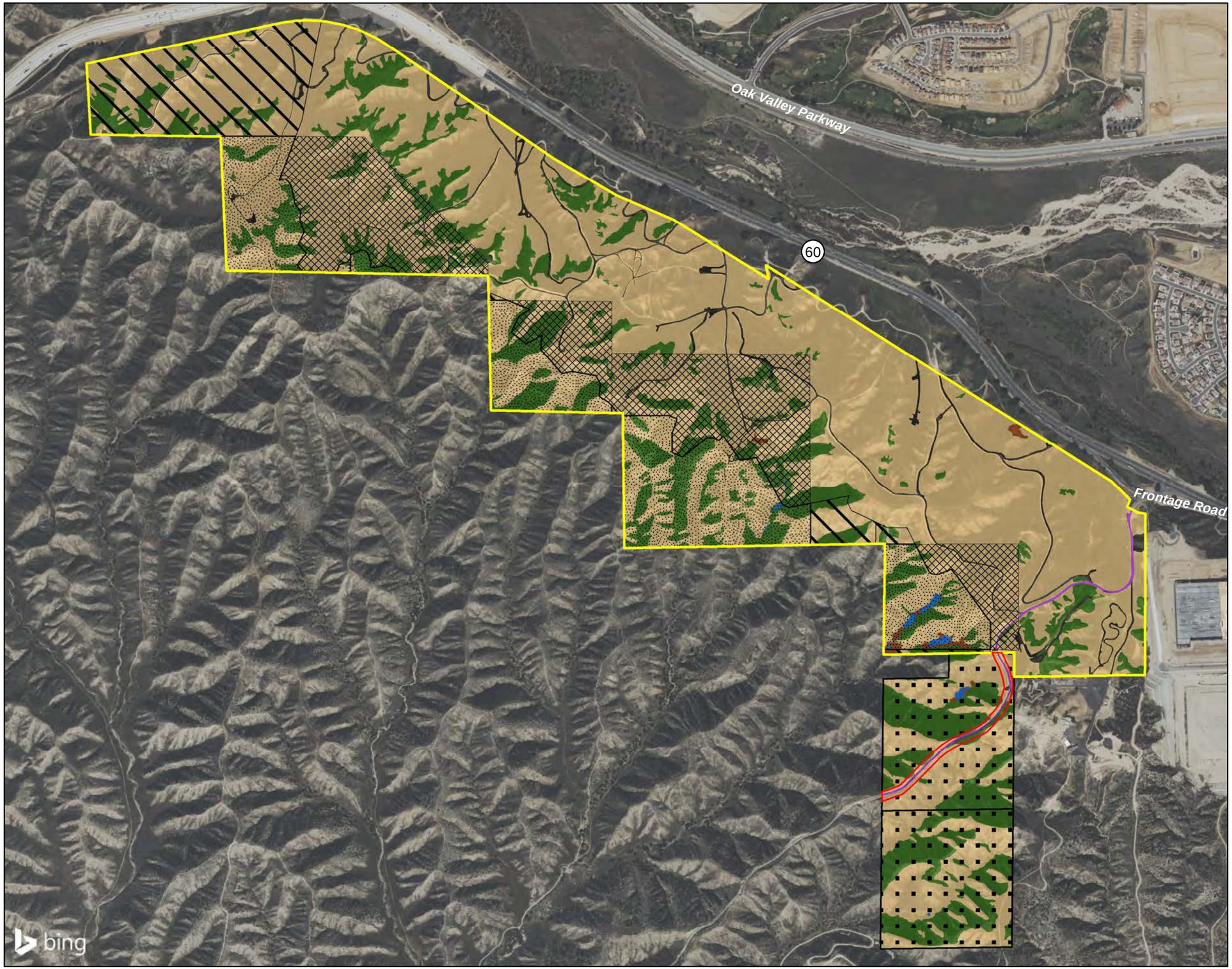

- Project Site
- Existing Jack Rabbit Trail Dedication (4.19 ac.)
- Described Lands - Impact (109.69 ac.)
- Described Lands - Proposed Conservation (97.20 ac.)
- Undescribed Lands - Onsite Replacement (55.22 ac.)
- Undescribed Lands - Offsite Replacement (78.40 ac.)
- Chaparral
- Riversidean Sage Scrub
- Disturbed
- Jack Rabbit Trail Road
- Non-Native Grassland
- Southern Riparian Scrub

The boundaries for Described Conservation represent an approximation of the MSHCP described midrange goal as applicable for each Criteria Cell.

N

0 475 950 1,900

Feet

1 inch = 950 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 23, 2022

BEAUMONT POINTE

Vegetation Impact/Conservation Comparison (GLA Baseline)

GLENN LUKOS ASSOCIATES

Exhibit 6A

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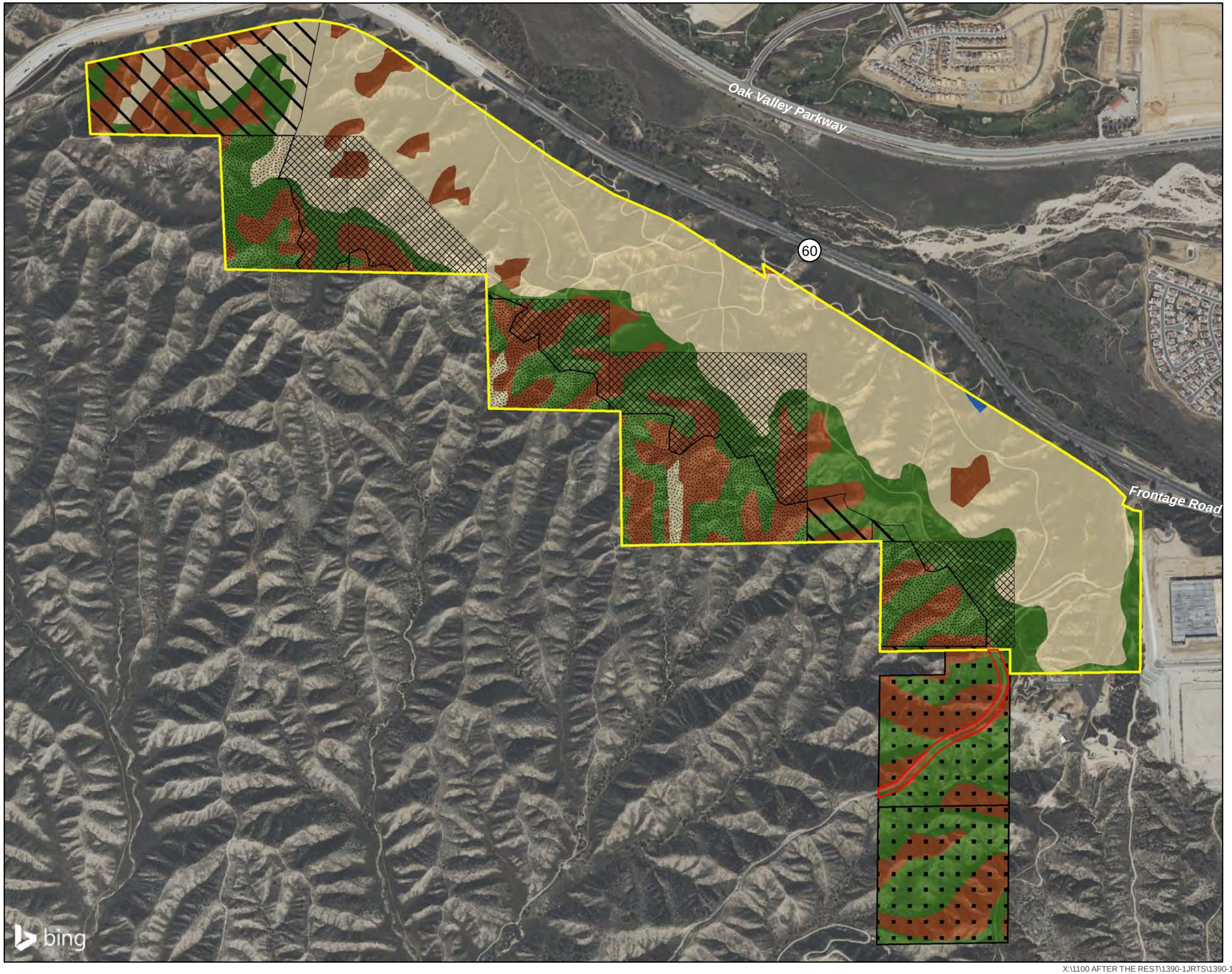


- Project Site
- Existing Jack Rabbit Trail Dedication (4.19 ac.)
- Described Lands - Impact (109.69 ac.)
- Described Lands - Proposed Conservation (97.20 ac.)
- Undescribed Lands - Onsite Replacement (55.22 ac.)
- Undescribed Lands - Offsite Replacement (78.40 ac.)
- Chaparral
- Coast Live Oak Woodland
- Non-native Grassland
- Riversidean Sage Scrub

The boundaries for Described Conservation represent an approximation of the MSHCP described midrange goal as applicable for each Criteria Cell.

N

0 475 950 1,900

Feet

1 inch = 950 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 23, 2022

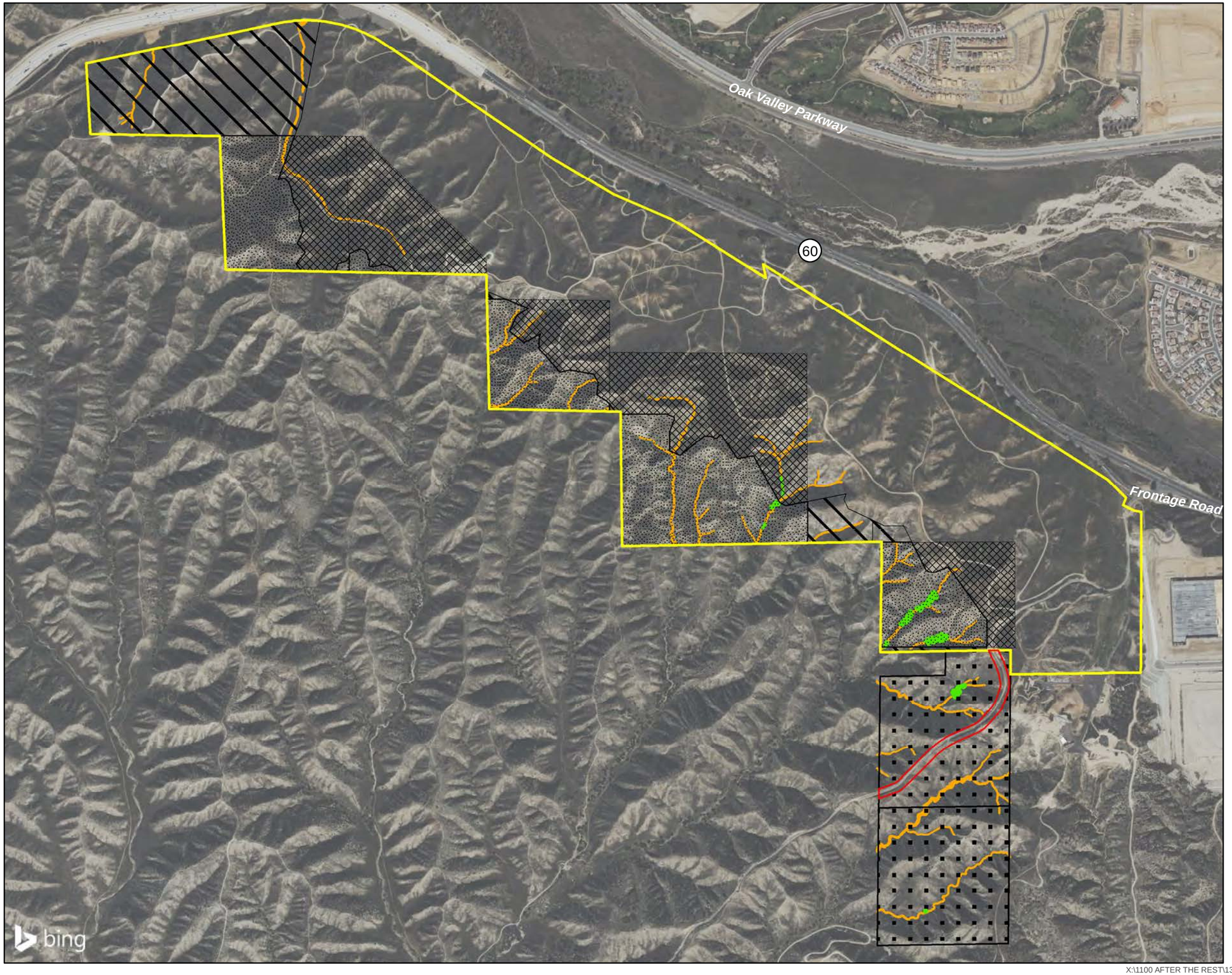
BEAUMONT POINTE

Vegetation Impact/Conservation Comparison (1994 Rough Step)

GLENN LUKOS ASSOCIATES

Exhibit 6B

X:\1100 AFTER THE REST\1390-1JRTS\1390-1_GIS\Conservation_GIS\REV7\1390-1_1994Vegetation_ReserveAssembly_REV7.mxd



- Project Site
- Existing Jack Rabbit Trail Dedication (4.19 ac.)
- Described Lands - Impact (109.69 ac.)
- Described Lands - Proposed Conservation (97.20 ac.)
- Undescribed Lands - Onsite Replacement (55.22 ac.)
- Undescribed Lands - Offsite Replacement (78.40 ac.)
- MSHCP Riverine (2.57 ac.)
- MSHCP Riparian (1.23 ac.)

The boundaries for Described Conservation represent an approximation of the MSHCP described midrange goal as applicable for each Criteria Cell.

N

0 475 950 1,900

Feet

1 inch = 950 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 23, 2022

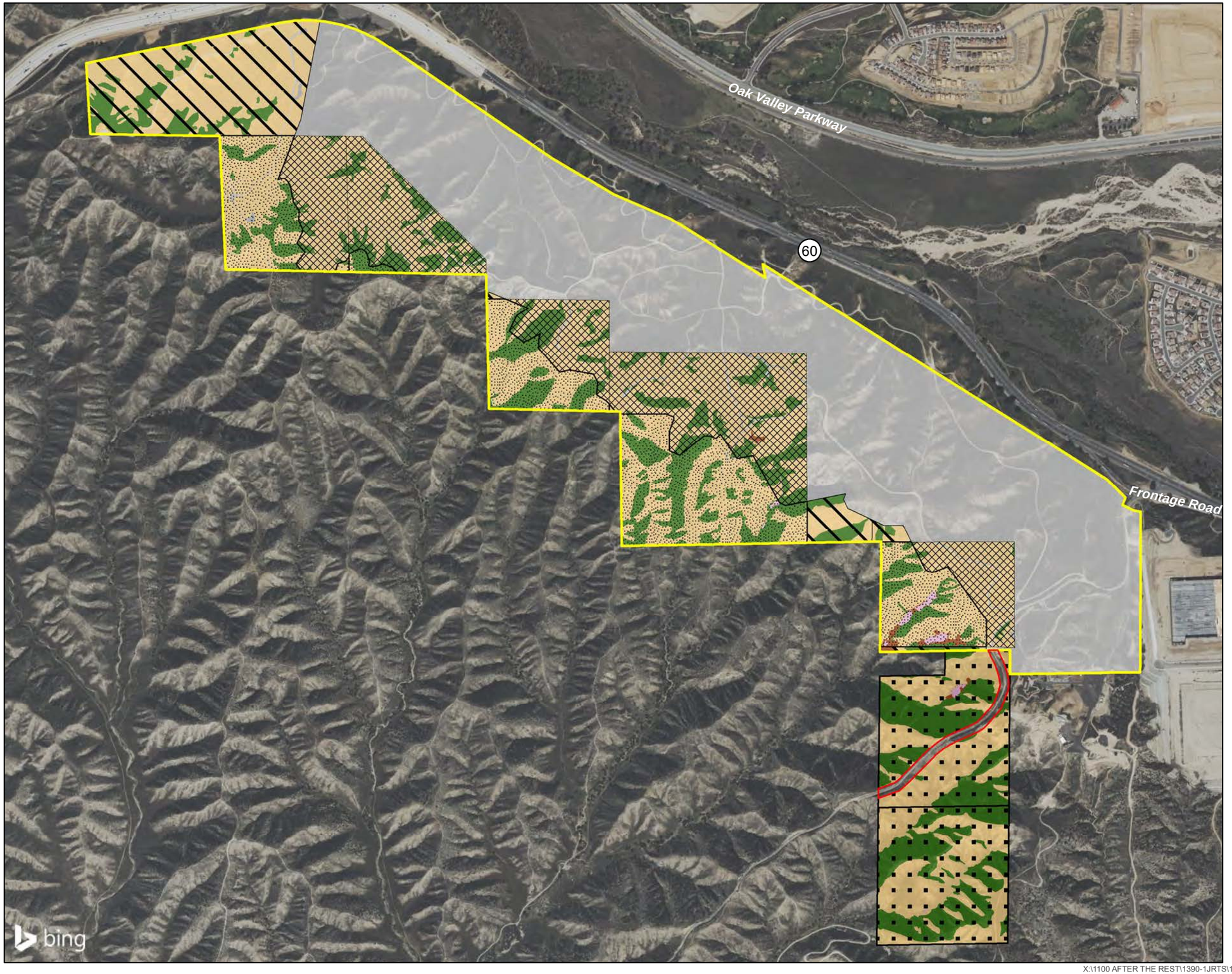
BEAUMONT POINTE

MSHCP Riparian/Riverine Areas Map

GLENN LUKOS ASSOCIATES

Exhibit 7

X:\1100 AFTER THE REST\1390-1JRTS\1390-1_GIS\Conservation_GIS\REV7\1390-1_RiparianRiverine_REV7.mxd



- Project Site
- Existing Jack Rabbit Trail Dedication (4.19 ac.)
- Proposed Impacts – Not Described for Conservation
- Described Lands - Impact (109.69 ac.)
- Described Lands - Proposed Conservation (97.20 ac.)
- Undescribed Lands - Onsite Replacement (55.22 ac.)
- Undescribed Lands - Offsite Replacement (78.40 ac.)
- Chaparral
- Non-Native Grassland
- Riversidean Sage Scrub
- Southern Riparian Scrub

The boundaries for Described Conservation represent an approximation of the MSHCP described midrange goal as applicable for each Criteria Cell.

N

0 475 950 1,900

Feet

1 inch = 950 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 24, 2022

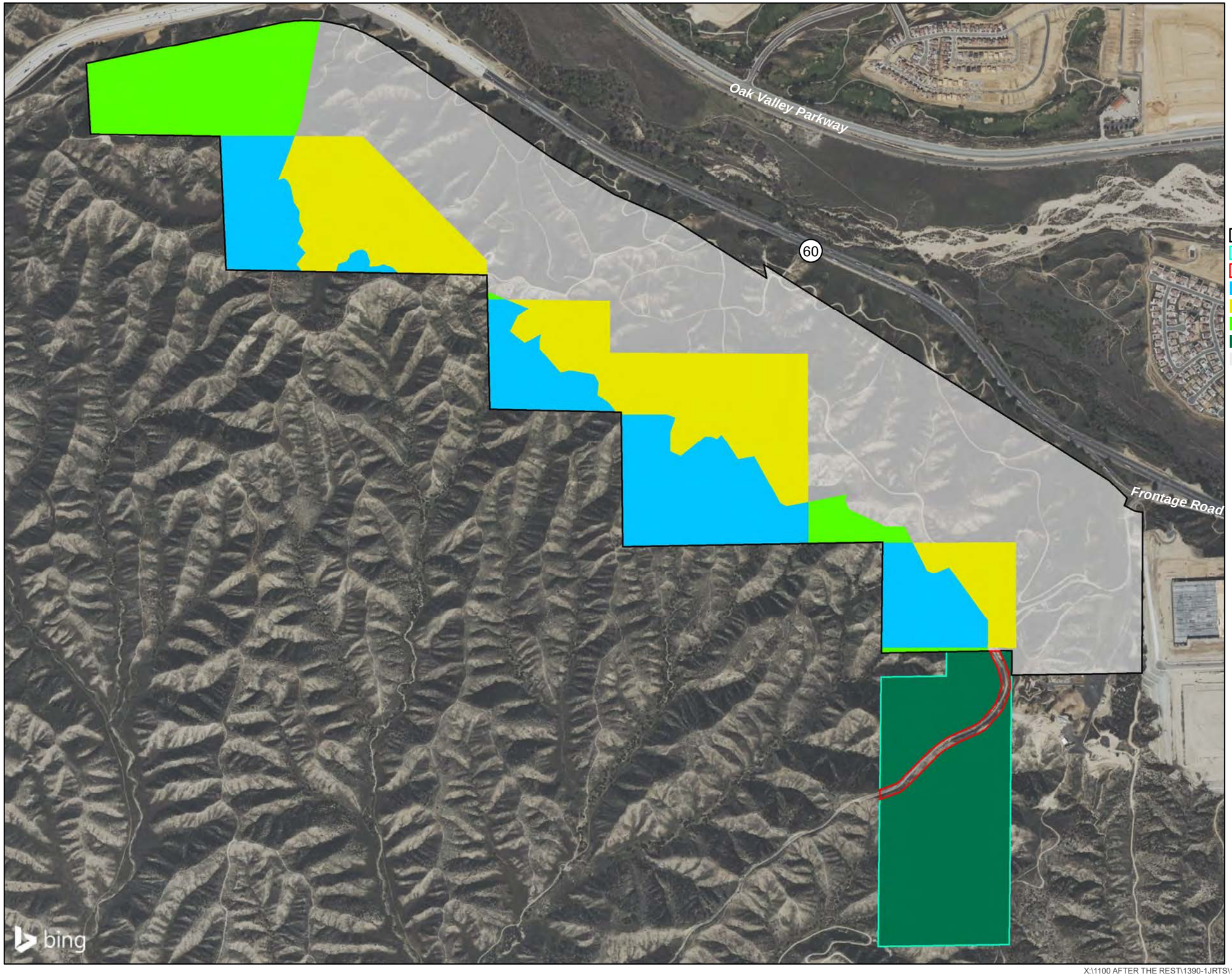
BEAUMONT POINTE

Live-In Habitat for Scrub/Grassland Species Map

GLENN LUKOS ASSOCIATES

Exhibit 8A

X:\1100 AFTER THE REST\1390-1JRTS\1390-1_GIS\Conservation_GIS\REV7\1390-1_LiveIn_Chap_NNG_RSS_REV7_8A.mxd



- Project Site
- Proposed MSHCP Conservation (Offsite)
- Existing Jack Rabbit Trail Dedication (4.19 ac.)
- Described Live-in Habitat Proposed for Conservation (97.20 ac.)
- Described Live-in Habitat to be Impacted (109.69 ac.)
- Replacement Live-in Habitat Conservation - Onsite Replacement (55.22 ac.)
- Replacement Live-in Habitat Conservation - Offsite Replacement (78.40 ac.)
- Proposed Impacts – Not Described for Conservation

The boundaries for Described Conservation represent an approximation of the MSHCP described midrange goal as applicable for each Criteria Cell.

N

0 475 950 1,900

Feet

1 inch = 950 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 23, 2022

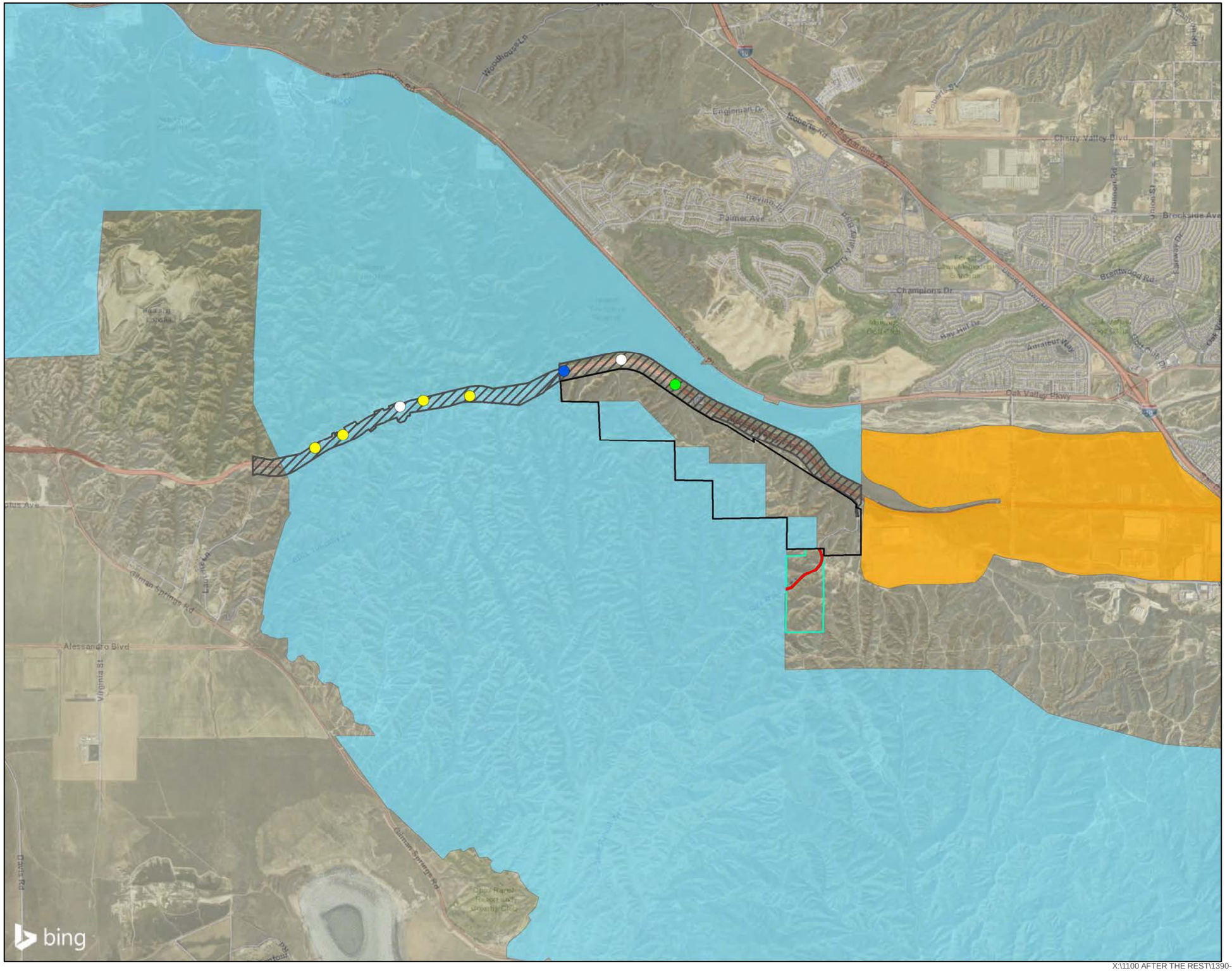
BEAUMONT POINTE

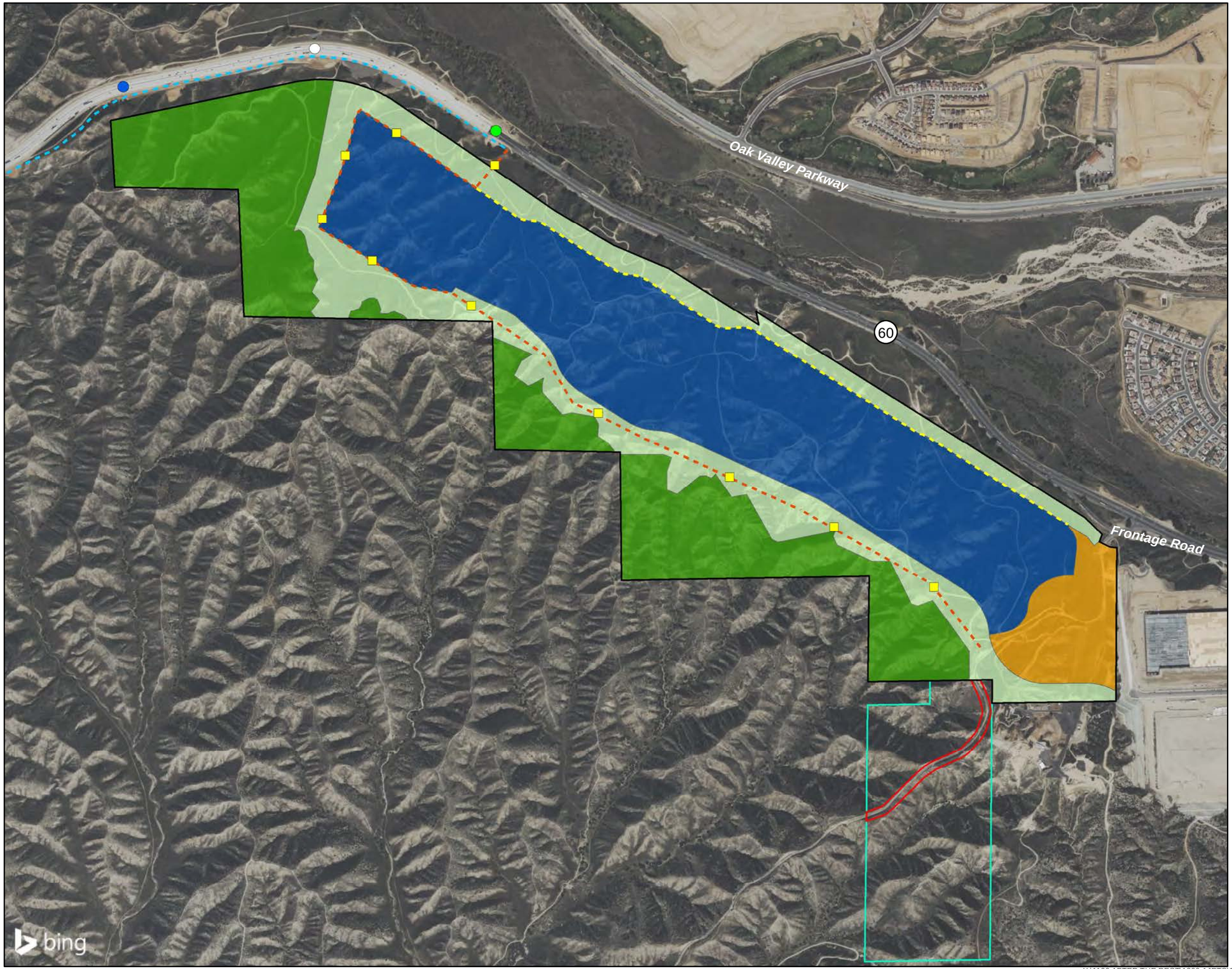
Live-In Habitat for Scrub/Grassland Species Map

GLENN LUKOS ASSOCIATES

Exhibit 8B

X:\1100 AFTER THE REST\1390-1JRTS\1390-1_GIS\Conservation_GIS\REV7\1390-1_LiveIn_Chap_NNG_RSS_REV7_8B.mxd


Project Site
Proposed Conservation - Offsite
Existing Jack Rabbit Trail Dedication
60 Freeway
Existing/Planned Developments
Proposed Core 3 (Approximate)
CalTrans 20'x20' Culvert
CalTrans Arch Concrete Pipe (ACP)
CalTrans Corrugated Metal Pipe (CMP)
CalTrans Reinforced Concrete Pipe (RCP)
N
0
1,665
3,330
6,660
Feet
1 inch = 3,330 feet
Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 23, 2022
BEAUMONT POINTE
Proposed SR-60 Wildlife Crossings Map
GLENN LUKOS ASSOCIATES
Exhibit 9A
X:\1100 AFTER THE REST\1390-1JRTS\1390-1_GIS\Conservation_GIS\REV7\1390-1_WildlifeMovementREV7_9A.mxd



- Project Site
- Existing Jack Rabbit Trail Dedication
- Proposed Conservation - Offsite
- Onsite Conservation
- Project Maintained Open Space
- Industrial
- General Commercial

Proposed Wildlife Crossings (CalTrans)

- CalTrans 20'x20' Culvert
- CalTrans Corrugated Metal Pipe (CMP)
- CalTrans Reinforced Concrete Pipe (RCP)

Proposed Fencing

- SR-60 Wildlife Fence
- Beaumont Pointe Wildlife Fence
- Beaumont Pointe Security Fence
- Wildlife Gate

N

0 475 950 1,900

Feet

1 inch = 1,000 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: August 24, 2022

BEAUMONT POINTE

Proposed Fencing and SR-60 Crossings Map

GLENN LUKOS ASSOCIATES

Exhibit 9B

X:\1100 AFTER THE REST\1390-1JRTS\1390-1_GIS\Conservation_GIS\REV7\1390-1_WildlifeMovement_Fencing_REV7_9B.mxd

STATISTICAL SUMMARY

PA	LAND USE DESIGNATION	ACRES
1	GENERAL COMMERCIAL	26.0
2	GENERAL COMMERCIAL	4.2
	GENERAL COMMERCIAL SUBTOTAL	***30.2***
3	INDUSTRIAL	1.8
4	INDUSTRIAL	67.3
5	INDUSTRIAL	52.2
6	INDUSTRIAL	33.6
7	INDUSTRIAL	30.2
8	INDUSTRIAL	47.5
	INDUSTRIAL SUBTOTAL	***232.6***
9	OPEN SPACE	124.7
10	OPEN SPACE - CONSERVATION	152.4
	PROJECT TOTAL	***539.9***

Note* Industrial Way (40') and Entertainment Way (50') are private roads.

P.A. 10
152.4 AC

P.A. 9

P.A. 8
47.5 AC

P.A. 7
30.2 AC

P.A. 6
33.6 AC

P.A. 5
52.2 AC

P.A. 4
67.3 AC

P.A. 9
124.7 AC

P.A. 10

P.A. 9

P.A. 10

P.A. 9

P.A. 3
1.8 AC

P.A. 2
4.2 AC

P.A. 1
26.0 AC

P.A. 10

INDUSTRIAL WAY

OAK VALLEY PARKWAY

60

Limits of Disturbance

Limits of Disturbance overlaps with Property Boundary

Limits of Disturbance overlaps with Property Boundary

Limits of Disturbance

Connection to Existing Jack Rabbit Trail

4TH STREET

FRONTAGE ROAD

JACK RABBIT TRAIL

PRIVATE ACCESS TO EXISTING RESIDENCE

SEE INSET

P.A. 4
INDUSTRIAL
67.3 AC

P.A. 9

P.A. 2
GENERAL
COMMERCIAL
4.2 AC

P.A. 3
INDUSTRIAL
1.8 AC

P.A. 9
OPEN SPACE
124.7 AC

P.A. 10
OPEN SPACE -
CONSERVATION
152.4 AC

P.A. 1
GENERAL COMMERCIAL
26.0 AC

Limits of Disturbance

Connection to Existing Jack Rabbit Trail

ENTERTAINMENT WAY

INDUSTRIAL WAY

4TH STREET

FRONTAGE ROAD

JACK RABBIT TRAIL

PRIVATE ACCESS TO EXISTING RESIDENCE

Legend

- WQMP BASIN
- L — SEWER LIFT STATION
- OPTIONAL WATER TANK

Source(s): Nearmap (2022), RCTLMA (2022)
Composite: Proactive Engineering Consultants (08-04-2022), Herdman Architecture (07-09-2021)

BEAUMONT POINTE SPECIFIC PLAN

JOB NUMBER: 1095-003
DATE: 08-10-2022

0 550 1,100 Feet

LAND USE PLAN

APPENDIX B – GIS ANALYSIS AND BOUNDARY INACCURACIES

This document discusses inaccuracies with geographic information systems (GIS)-based boundaries and data utilized by the County of Riverside and the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) versus the boundaries utilized for analysis for the Beaumont Pointe Specific Plan that are based on the more accurate American Land Title Association (ALTA) surveys. The GIS-based boundaries that have inaccuracies include the Assessor's Parcels, MSHCP Criteria Cells, and Public/Quasi-Public (PQP) Conserved Lands. In addition, the County GIS boundaries depict an incorrect right-of-way (ROW) alignment for Jack Rabbit Trail Road, which results in incorrect boundaries depicted for the parcels adjoining the ROW within the Project proponent's ownership. The following discusses these inaccuracies and how these have been corrected/adjusted for the Beaumont Pointe Specific Plan Criteria Refinement Analysis.

MSHCP Layers

The GIS-based boundaries utilized by the County and Regional Conservation Authority (RCA) for the MSHCP are incorrect for portions of the PQP Conserved Lands and Criteria Cells coinciding with the Project site. A block of Bureau of Land Management (BLM) lands occurring adjacent to the Project site is designated as PQP Conserved Lands. The BLM lands are adjacent to five parcels associated with the Project site, including APN# 422-060-002, 422-060-005, 422-060-009, 422-060-010 and 422-060-022. However, the boundary of the BLM lands and the adjoining parcels is incorrectly drawn compared with the ALTA survey boundary, resulting in slight areas of overlap between the PQP Conserved Land boundary and the ALTA survey boundary for the Project site. To correct this overlap, GLA re-drew the PQP boundary to match with the ALTA survey boundary for the Project site, for use solely with analyses related to the Beaumont Pointe Specific Plan. Exhibit 1 depicts the incorrect alignment of the PQP boundary and the resulting overlap with the Project site boundary, as well as the adjusted boundary for the PQP lands.

The boundaries for Criteria Cells 933, 936, 1030, 1032, 1125 and 1126, and Cell Group A' do not display correctly relative to the ALTA survey boundary for the Project site, as portions of the Cell and Cell Group boundaries are intended to align with the individual parcel boundaries. In one example, Cells 936, 1030 and 1032 are shifted west and north relative to correct parcel boundaries. In another example, Cell 1126 is intended to be exclusively part of Cell Group A' of the Reche Canyon/Badlands Area Plan and not part of the Pass Area Plan. However, as the County/RCA GIS boundaries are drawn, a small portion of Cell 1126 is depicted outside of (north of) Cell Group A'. To correct these inaccuracies, GLA re-drew the edges of those Cells that correspond with parcels associated with the Project, and re-drew the edges of Cell 1126 and 1032, and re-drew the boundary of Cell Group A', so that Cell 1126 is fully within Cell Group A' and Cell 1032 adjoins the Cell Group. Exhibit 2 displays the original and adjusted boundaries for the Criteria Cell and Cell Group relative to the Project and parcel boundaries.

Assessor's Parcels and Jack Rabbit Trail

The County GIS data depicts inaccurate boundaries for the Assessor's Parcels corresponding to the Project site and the proposed offsite conservation areas, which result in incorrect boundary locations as well as incorrect acreages for the parcels. The Criteria Refinement Analysis utilizes boundaries for the overall Project site and individual Assessor's Parcels based on the ALTA survey. The total Project site acreage is 539.9 acres, which includes 11 individual parcels (APN# 422-060-002, 422-060-005, 422-060-009, 422-060-010, 422-060-016, 422-060-017, 422-060-018, 422-060-021, 422-060-022, 422-170-005, and 422-170-008) plus the onsite portion of the existing Jack Rabbit Trail. The proposed offsite conservation lands total 78.40 acres, consisting of four parcels (APN# 422-170-007, 422-170-009, 422-170-010, and 422-170-011), but excluding the offsite Jack Rabbit Trail ROW adjacent to these four parcels. The County GIS data depicts a ROW boundary for Jack Rabbit Trail that does not match the dedicated ROW identified by the ALTA survey. The Criteria Refinement Analysis utilizes the correct boundaries for the four parcels and road ROW based on the ALTA survey. Exhibit 3 depicts the incorrect boundaries Jack Rabbit Trail ROW and the four adjoining parcels, as well as the correct boundaries based on the ALTA survey.

Project Site

60 Freeway Easement

PQP Overlap with Project Boundary

PQP Conserved Lands

PQP Conserved Lands - GLA Modified

N

0 400 800 1,600

Feet

1 inch = 800 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: November 18, 2021

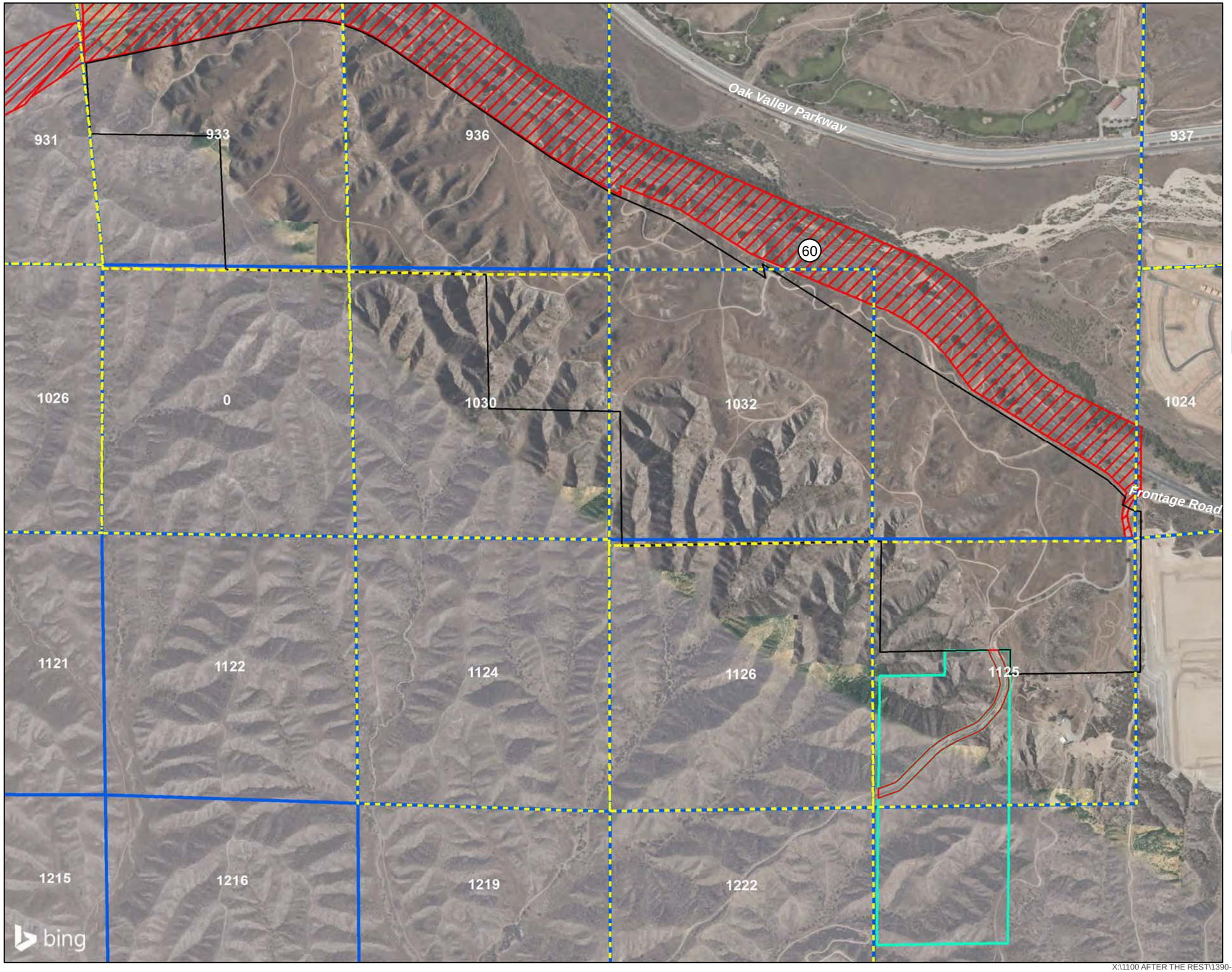
BEAUMONT POINTE

PQP Conserved Land Boundary Overlap

GLENN LUKOS ASSOCIATES

Exhibit 1

X:\1100 AFTER THE REST\1390-1JRTS\1390-1_GIS\Conservation_GIS\REV6\1390-1_Exhibit 1A_PQPCorrection.mxd



- Project Site
- Proposed MSHCP Conservation (Offsite)
- Existing Jack Rabbit Trail Dedication
- CriteriaCells_ForCriteriaRefinementOnly
- PQP Overlap with Project Boundary
- 60 Freeway Easement
- PQP Conserved Lands
- RCA MSHCP Conserved Lands
- Criteria Cells
- Criteria Cells - GLA Modified

N

0 475 950 1,900

Feet

1 inch = 950 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: November 18, 2021

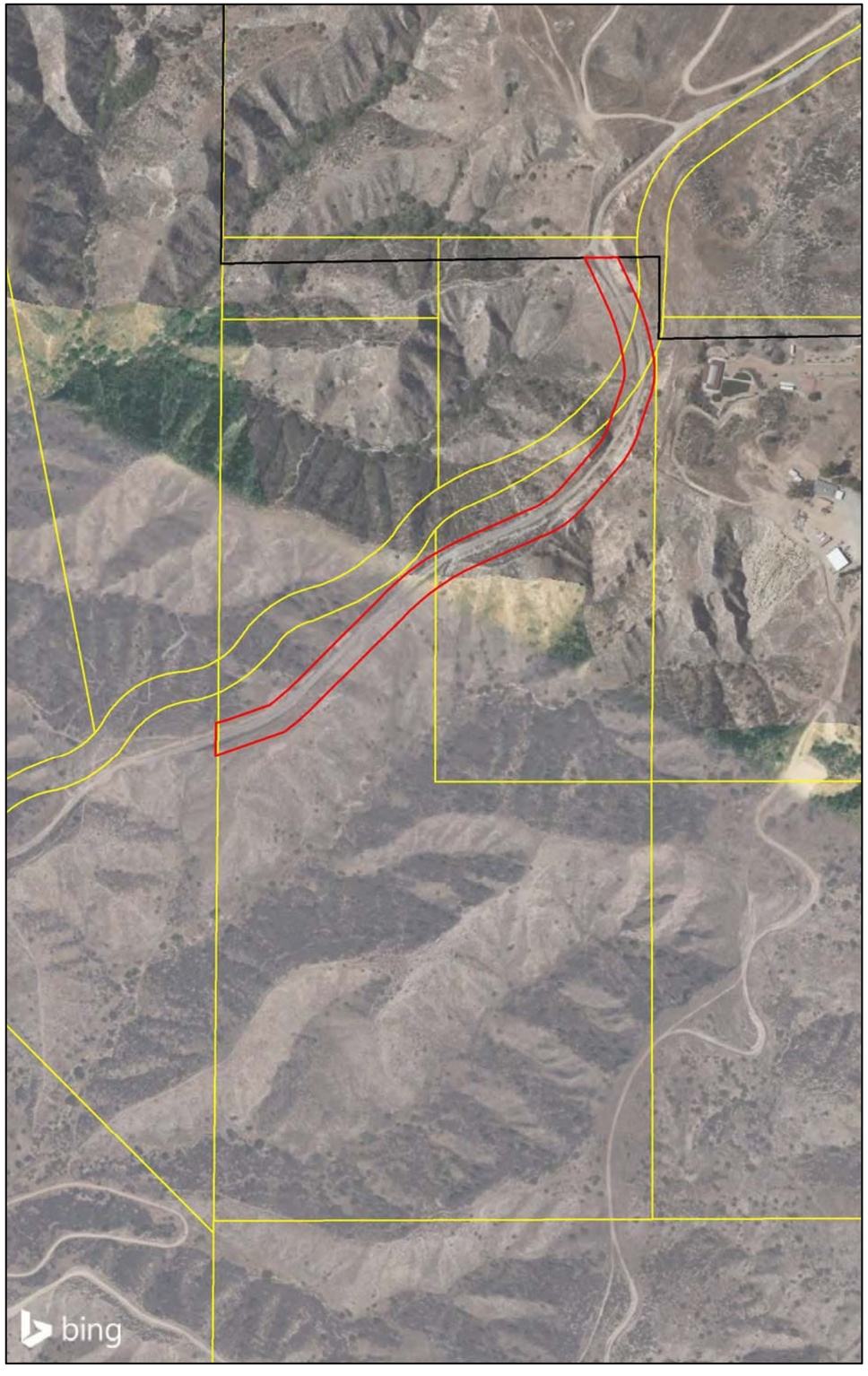
BEAUMONT POINTE

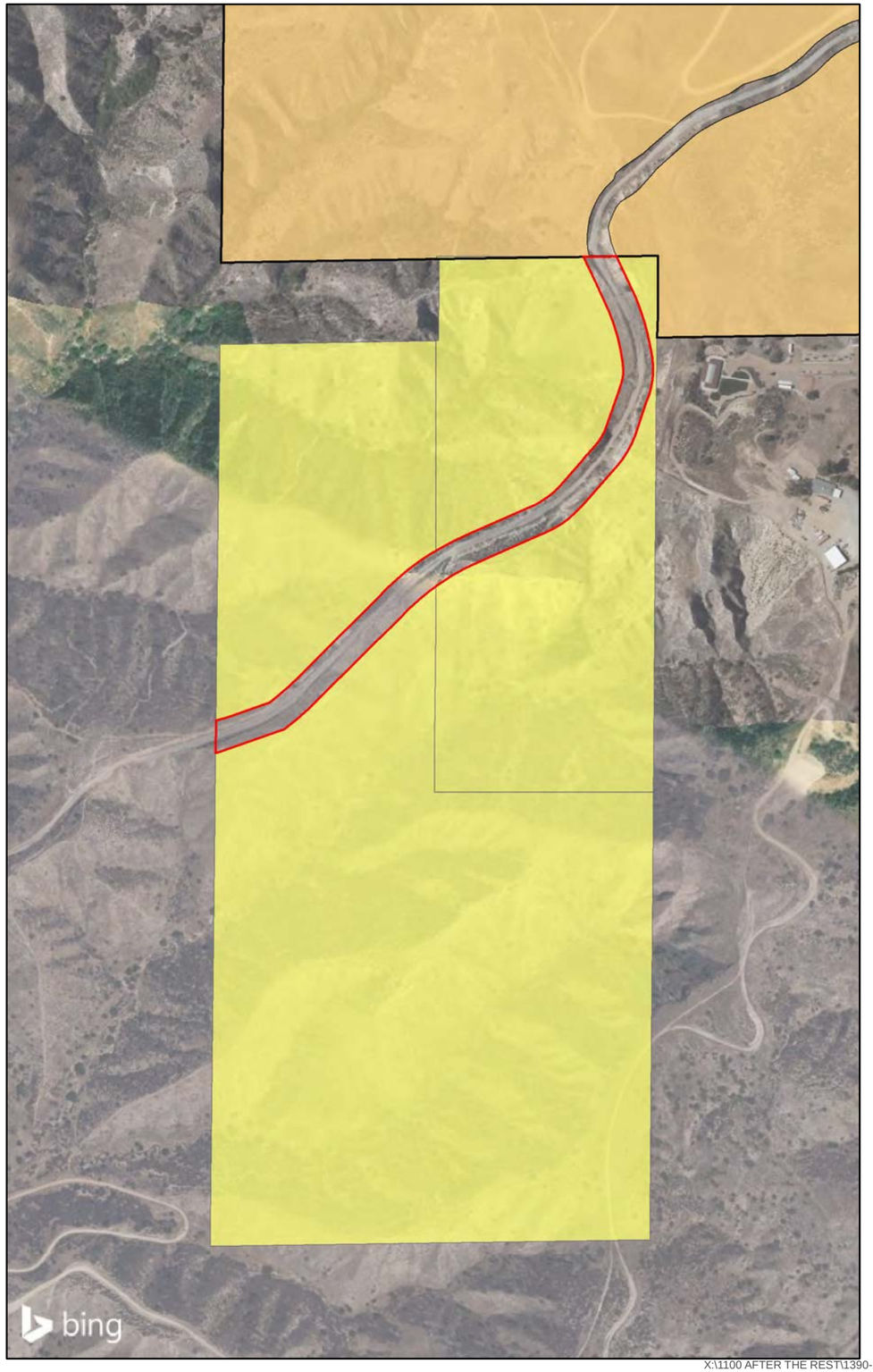
Criteria Cells Boundary Overlap

GLENN LUKOS ASSOCIATES

Exhibit 2

X:\1100 AFTER THE REST\1390-1JRTS\1390-1_GIS\Conservation_GIS\REV6\1390-1_Exhibit 2A_CritCellCorrection.mxd





- Project Site
- Existing Jack Rabbit Trail Dedication
- Riverside County Parcels
- Onsite Parcels - ALTA Survey
- Offsite Parcels - ALTA Survey

N

0 200 400 800

Feet

1 inch = 400 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: K. Kartunen, GLA
Date Prepared: November 18, 2021

BEAUMONT POINTE

JRTS County ROW Boundary Overlap

GLENN LUKOS ASSOCIATES

Exhibit 3

X:\1100 AFTER THE REST\1390-1JRTS\1390-1_GIS\Conservation_GIS\REV6\1390-1_Exhibit 3A_JRTSCorrection.mxd