

June 21st, 2021



Harley Knox 2021 LLC
c/o Mr. Matt Englhard
11777 San Vicente Blvd, #780
Los Angeles, CA 90049

Re: Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis for the Harley Knox Commerce Center Project Site, City of Perris, Western Riverside County, California

Dear Mr. Englhard:

This report presents the findings of a biological resources Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis for the 6.43-acre (1.22-Acre Offsite Impact Area) Harley Knox Commerce Center project site "Project Site" located within the western region of Riverside County, California. Specifically, the Project Site is located within APNs 302-100-020, 302-100-030, and 302-100-031 (including adjacent East Nance Street Right-Of-Ways).

The Project Site is located within United States Geological Survey (USGS) 7.5' Series Perris Quadrangle, Riverside County, Township 4 South, Range 3 West, Section 5. Specifically, the Project Site is located at 220-280 East Nance Street, extending south of Harley Knox Boulevard, City of Perris, California, as shown in Attachment A, *Regional Location Map* and Attachment B, *Project Site Map*.

The Project Site is located within the Western Riverside County MSHCP Mead Valley Plan and is not located within a Criteria Cell, Cell Group or linkage area as shown in Attachment C, *MSHCP Relationship Map* (RCA GIS Data Downloads 2021). The Project Site is located completely or partially within an MSHCP survey area for burrowing owl, criteria area and narrow endemic plant species.

This report incorporates the findings of an extensive literature review, compilation of existing documentation, field reconnaissance and focused sensitive plant surveys conducted during the spring of 2021. This documentation is consistent with accepted scientific and technical standards, the requirements of the United States Fish and Wildlife Service (USFWS), and the California Department of Fish and Wildlife (CDFW). When appropriate, general biological resources are described in summary form in an effort to provide the reader with adequate background information. However, the report focuses on documenting those resources considered to be significant and/or sensitive as outlined by the California Environmental Quality Act (CEQA) and the Western Riverside County MSHCP.

The following report provides a summary of topographic features, soils and habitats observed onsite. Onsite resources were also analyzed to determine which if any are subject to the United States Army Corps of Engineers (USACE) jurisdiction pursuant to Section 404 of the Clean Water Act, CDFW jurisdiction pursuant to Division 2, Chapter 6, Section 1600

of the Fish and Wildlife Code, the Santa Ana Regional Water Quality Control Board (RWQCB) 401 certification/Waste Discharge Requirements (WDR's), and MSHCP jurisdiction pursuant to section 6.1.2 (MSHCP 2004).

Accordingly, this report provides an overview of potential USACE, RWQCB, CDFW, MSHCP riparian/riverine/vernal pool jurisdictional resources (Section 6.1.2), and consistency with the MSHCP respective of the proposed development within the Project Site.

METHODS

Prior to visiting the Project Site, a review of all available and relevant data on the biological characteristics, sensitive habitats, and species potentially present on or adjacent to the Project Site was conducted. Additionally, aerial photography, and USGS topographic map were examined. After reviewing the available information, Cadre Environmental conducted a physical site assessment.

As required by the MSHCP, and during the initial property assessment process, all Project Site APN's were searched using the Regional Conservation Authority (RCA) Geographic Information System (GIS) Data to determine if the property falls within a "Criteria Area" and if additional surveys for narrow endemic/criteria area plant species or wildlife not adequately covered by the MSHCP may be required as shown in Attachment C, *MSHCP Relationship Map*.

Data, which contain digital images derived from aerial photography with orthographic projection properties, were used in conjunction with Cadre Environmental's in-house geographic information system (GIS) database as an important base layer to identify vegetation communities, drainage features, and USFWS designated critical habitat boundaries. Vegetation communities were then "ground-truthed" during field observations to obtain characteristic descriptions.

Literature Review

Existing biological resource conditions within and adjacent to the Project Site were initially investigated through review of pertinent scientific literature. Federal register listings, protocols, and species data provided by the USFWS were also reviewed in conjunction with anticipated federally listed species potentially occurring within the region of the Project Site. The California Natural Diversity Database (CNDDDB) (CDFW 2021a), a CDFW Natural Heritage Division species account database, was also reviewed for all pertinent information regarding the locations of known occurrences of sensitive species in the vicinity of the property. In addition, numerous regional floral and faunal field guides were utilized in the identification of species and suitable habitats. Combined, the reviewed sources provided an excellent baseline from which to inventory the biological resources potentially occurring in the region. Other CDFW reports and publications consulted include the following:

- Special Animals (CDFW 2021b);

- State and Federally Listed Endangered and Threatened Animals of California (CDFW 2021c);
- Special Vascular Plants and Bryophytes List (CDFW 2021d); and
- Endangered, Threatened, and Rare Plants of California (CDFW 2021e).

Field Assessment

The Project Site was initially surveyed on February 11th, 2021. The survey included complete coverage of the Project Site, with special attention focused toward sensitive species or those habitats potentially supporting sensitive flora or fauna that would be essential to efficiently implementing the terms and conditions of the Western Riverside County MSHCP including features potentially subject to MSHCP 6.1.2 jurisdiction. Aerial photography of the Project Site and vicinity was utilized to accurately locate and survey the property. General plant communities were preliminarily mapped directly on the aerial photo using visible landmarks in the field, which are depicted in Attachment D, *Vegetation Communities Map*. Representative photographs of the Project Site's natural resources were taken during the field survey as shown in Attachments E and F, *Current Project Site Photographs*. Habitat assessments were conducted for, but not limited to, the following target species/groups.

- Burrowing owl
- MSHCP Criteria Area Plant Species
- MSHCP Narrow Endemic Plant Species
- MSHCP Section 6.1.2 Riparian, Riverine, Vernal Pool Resources

Sensitive Plant Surveys

As required by Perris Valley Commerce Center Specific Plan (PVCCSP) EIR mitigation measure (MM) Bio 6, floristic and focused plant surveys were conducted in order to identify all species observed on the Project Site. Additionally, program goals would also locate, census, and map the target MSHCP plants, and other CNPS or species of local concern, if present, occurring onsite.

Field notes and site photographs were taken during each field survey. These notes recorded the date, location, plant species observed, and general habitat characteristics of each area of the project and habitats examined that day. All plant species encountered during the field surveys were identified and recorded in the field notes, including any special-status plants occurring on the Project Site. Surveys were performed in a manner consistent with the MSHCP and other applicable survey protocol requirements as outlined by USFWS (1996), CNPS (2001), and CDFW (2009).

Fieldwork was coordinated throughout the spring and blooming period of smooth tarplant, site-specific habitat conditions, and vegetation-soil associations of the target species. Accordingly, three (3) surveys were conducted onsite, including May 12th, June 2nd, and 17th, 2021.

All portions of the Project Site were surveyed on-foot by walking slowly and methodically across each habitat type. Scientific nomenclature and common names used in this report generally follow Roberts et al. (2004) and Baldwin et al. (2012), or Jepson Project eFlora (2021) for updated taxonomy.

EXISTING CONDITIONS

Vegetation Communities

The Project Site is currently dominated by disturbed/developed and ornamental (exotic) habitats as illustrated in Attachment D, *Vegetation Communities Map*, Attachments E and F, *Current Project Site Photographs*, and outlined in Table 1, *Project Site Vegetation Community Acreages*.

Table 1.
Project Site Vegetation Community Acreages

| Vegetation Community | Project Site (acres) | Offsite Impact Area (acres) | TOTAL Impacts (acres) |
|----------------------|----------------------|-----------------------------|-----------------------|
| Disturbed/Developed | 6.25 | 1.22 | 7.47 |
| Ornamental (Exotic) | 0.18 | -- | 0.18 |
| TOTAL | 6.43 | 1.22 | 7.65 |

Source: *Cadre Environmental 2021*.

The Project Site is primarily characterized as disturbed and is dominated by ruderal species. A few native species commonly documented within disturbed habitats were also documented onsite. Scattered plant species documented onsite include cheeseweed (*Malva parviflora*), red-stemmed filaree (*Erodium cicutarium*), tumbling pigweed (*Amaranthus albus*), ranchers fireweed (*Amsinckia menziesii*), California aster (*Corethrogyne filaginifolia*), doveweed (*Croton setigerus*), tree tobacco (*Nicotiana glauca*), castor bean (*Ricinus communis*), black mustard (*Brassica nigra*), Russian thistle (*Kali tragus*), horseweed (*Conyza canadensis*), and ripgut grass (*Bromus diandrus*).

The developed portion of the Project Site includes the eastern region of the offsite impact area (East Nance Street Right-of-Way).

Several remnant ornamental trees and shrubs are located in the southern region of the Project Site where residential homes were once located. Species include, Peruvian peppertrees (*Schinus molle*), Eucalyptus (*Eucalyptus* sp.), pine trees (*Pinus* sp.), olive (*Olea europaea*), and oleander (*Nerium oleander*).

Soils

The Soil Survey of Western Riverside Area has classified the Project Site as Grangeville sandy loam, drained, saline-alkaline and (GpB), and Domino silt loam saline-alkaline (DV)

as illustrated in Attachment G, *Soils Association Map*. Domino soils are classified as “sensitive” by the MSHCP.

Regional Connectivity/Wildlife Movement

Overview

Wildlife corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated “islands” of wildlife habitat. In the absence of habitat linkages that allow movement to adjoining open space areas, various studies have concluded that some wildlife species, especially the larger and more mobile mammals, will not likely persist over time in fragmented or isolated habitat areas because they prohibit the infusion of new individuals and genetic information (MacArthur and Wilson 1967, Soule 1987, Harris and Gallagher 1989, Bennett 1990). Corridors effectively act as links between different populations of a species. A group of smaller populations (termed “demes”) linked together via a system of corridors is termed a “metapopulation.” The long-term health of each deme within the metapopulation is dependent upon its size and the frequency of interchange of individuals (immigration vs. emigration). The smaller the deme, the more important immigration becomes, because prolonged inbreeding with the same individuals can reduce genetic variability. Immigrant individuals that move into the deme from adjoining demes mate with individuals and supply that deme with new genes and gene combinations that increases overall genetic diversity. An increase in a population’s genetic variability is generally associated with an increase in a population’s health.

Corridors mitigate the effects of habitat fragmentation by (1) allowing animals to move between remaining habitats, which allows depleted populations to be replenished and promotes genetic diversity; (2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events (such as fires or disease) will result in population or local species extinction; and (3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs (Noss 1983, Fahrig and Merriam 1985, Simberloff and Cox 1987, Harris and Gallagher 1989). Wildlife movement activities usually fall into one of three movement categories: (1) dispersal (e.g., juvenile animals from natal areas, individuals extending range distributions); (2) seasonal migration; and (3) movements related to home range activities (foraging for food or water, defending territories, searching for mates, breeding areas, or cover). A number of terms have been used in various wildlife movement studies, such as “wildlife corridor”, “travel route”, “habitat linkage”, and “wildlife crossing” to refer to areas in which wildlife moves from one area to another. To clarify the meaning of these terms and facilitate the discussion on wildlife movement in this study, these terms are defined as follows:

Travel Route: A landscape feature (such as a ridge line, drainage, canyon, or riparian strip) within a larger natural habitat area that is used frequently by animals to facilitate movement and provide access to necessary resources (e.g., water, food, cover, den sites). The travel route is generally preferred because it provides the least amount of topographic resistance in moving from

one area to another; it contains adequate food, water, and/or cover while moving between habitat areas; and provides a relatively direct link between target habitat areas.

Wildlife Corridor: A piece of habitat, usually linear in nature, that connects two or more habitat patches that would otherwise be fragmented or isolated from one another. Wildlife corridors are usually bounded by urban land areas or other areas unsuitable for wildlife. The corridor generally contains suitable cover, food, and/or water to support species and facilitate movement while in the corridor. Larger, landscape-level corridors (often referred to as “habitat or landscape linkages”) can provide both transitory and resident habitat for a variety of species.

Wildlife Crossing: A small, narrow area, relatively short in length and generally constricted in nature, that allows wildlife to pass under or through an obstacle or barrier that otherwise hinders or prevents movement. Crossings typically are manmade and include culverts, underpasses, drainage pipes, and tunnels to provide access across or under roads, highways, pipelines, or other physical obstacles. These are often “choke points” along a movement corridor.

Wildlife Movement within the Project Site

The Project Site is not located within an MSHCP designated core, extension of existing core, non-contiguous habitat block, constrained linkage, or linkage area.

RESULTS AND SUMMARY OF COMPLIANCE WITH MSHCP & CEQA POLICIES

The purpose of this report is to document the existing biological resources, identify general vegetation types, and assess the potential biological and regulatory constraints associated with the proposed development within the Project Site. The following sections summarize the project’s relationship to MSHCP criteria cell areas, MSHCP consistency and CEQA guidelines.

A total of 7.65 acres of vegetation communities and developed areas will be directly impacted as a result of project implementation as summarized in Table 1, *Project Site Vegetation Community Acreages*, and illustrated on Attachment H, *Project Site Impact Map*. Direct impacts to all vegetation communities will be mitigated to a level of less than significant by implementing Biological Mitigation and Avoidance Measure, **BIO-1, MSHCP Local Development Mitigation Fee**.

The Project Site is not located within an MSHCP Criteria Area, Cell Group, or Linkage Area. Therefore, no Habitat Evaluation and Acquisition Negotiation Strategy (HANS), Consistency Analysis or Joint Project Review (JPR) are required.

Sensitive Habitats

No sensitive or undisturbed native habitats were documented within or adjacent to the Project Site.

Sensitive Plants

The entire Project Site occurs within a predetermined Survey Area for thirteen (13) narrow endemic and criteria area plant species (RCA GIS Data Downloads 2021). The majority of the Project Site also possesses sensitive soils (Domino) often associated with several regionally occurring MSHCP target sensitive plant species. Suitable habitat for a single sensitive plant species, smooth tarplant (*Centromadia pungens ssp. laevis*), an MSHCP Criteria Area species was documented onsite within the disturbed regions of the Project Site as outlined in Table 2, MSHCP Criteria Area & Narrow Endemic Plant Species Assessment.

As required by PVCCSP EIR mitigation measure (MM) Bio 6, floristic and focused plant surveys were conducted in order to identify all species observed on the Project Site, Appendix A, Western Riverside County Multiple Species Habitat Conservation Plan Sensitive Plant Surveys for the 6.43-Acre (1.22-Acre Offsite Impact Area) Harley Knox Commerce Center Project Site, City of Perris, Western Riverside County, California.

Narrow Endemic Plants: None of the four (4) MSHCP narrow endemic sensitive plant species were expected or detected during the project surveys and are therefore not expected to occur due to lack of observation or suitable habitat as noted in Table 2, *Potential MSHCP Narrow Endemic and Criteria Area Plant Assessment*. The project is compliant with MSHCP Section 6.1.3

Criteria Area Plants: None of the nine (9) MSHCP criteria area sensitive plant species including smooth tarplant were detected during the project surveys as noted in Table 2, *Potential MSHCP Narrow Endemic and Criteria Area Plant Assessment*.

The project is compliant with MSHCP Section 6.3.2.

No state or federally listed threatened or endangered plant species were detected onsite.

**Table 2.
 MSHCP Criteria Area & Narrow Endemic Plant Species Assessment**

| Species Name (Scientific Name) Status | Habitat Description | Comments |
|--|---|--|
| San Diego ambrosia <i>(Ambrosia pumila)</i> FE CRPR List 1B.1 MSHCP NEPSA | San Diego ambrosia is known from Baja California, Mexico, and San Diego and Riverside counties in the United States. It blooms May to September. San Diego ambrosia occurs primarily on upper terraces of rivers and drainages as well as in open grasslands, openings in coastal sage scrub, and occasionally in areas adjacent to vernal pools. | This perennial species was not detected within the Project Site and is not expected to be present. |

| Species Name (Scientific Name) Status | Habitat Description | Comments |
|---|---|---|
| San Jacinto Valley crownscale <i>(Atriplex coronata var. notatior)</i> FE CRPR List 1B.1 MSHCP CAPSA CA Endemic | The San Jacinto Valley crownscale occurs primarily in floodplains that support alkali scrub, alkali playas, vernal pools, and occasionally alkali grasslands (Bramlet 1993). | The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during conducted in the spring of 2021. |
| Parish's brittlebush <i>(Atriplex parishii)</i> CRPR List 1B.1 MSHCP CAPSA | Parish's brittlebush is a small prostrate to decumbent annual, white scaly, and is often much less than eight inches in length. It blooms May to October. This species occurs on alkali or saline flats, alkali meadows, and in or along the margins of vernal pools or playa depressions. | The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during conducted in the spring of 2021. |
| Davidson's saltscale <i>(Atriplex serenana var. davidsonii)</i> CRPR List 1B.2 MSHCP CAPSA | Davidson's saltscale is a decumbent to ascending annual that is sparsely scaly. It blooms April to October. It grows on coastal bluffs and alkaline alluvial terraces, and on alkali or saline flats in interior areas such as western Riverside County. | The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during conducted in the spring of 2021. |
| Thread-leaved brodiaea <i>(Brodiaea filifolia)</i> FT,SE CRPR List 1B.1 MSHCP CAPSA CA Endemic | Thread-leaved brodiaea is a geophyte, which produces leaves and flower stalks that sprout from corms (underground bulb-like storage stems). Thread-leaved brodiaea blooms March to June. Thread-leaved brodiaea typically occurs on gentle hillsides, valleys, and floodplains in semi-alkaline flats of riparian areas, vernal pools, mesic southern needlegrass grassland, mixed native-annual grassland, and alkali grassland plant communities in association with clay, clay loam, or alkaline silty-clay soils. | The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during conducted in the spring of 2021. |
| Smooth Tarplant <i>(Centromadia pungens ssp. laevis)</i> CRPR 1B.1 MSHCP CAPSA | Smooth tarplant is an annual member of the sunflower family (Asteraceae) that occurs in vernal pools, alkali playas and scrub, alkali grasslands, riparian areas, along watercourses and disturbed sites. It blooms April to September. | Smooth tarplant was not detected within the Project Site during focused surveys conducted in the spring of 2021. |

| Species Name (Scientific Name) Status | Habitat Description | Comments |
|--|---|---|
| Round-leaved filaree <i>(Erodium macrophyllum)</i> CRPR List 2.1 MSHCP CAPSA CA Endemic | Habitats include open areas in cismontane woodland and valley and foothill grasslands, which are often associated with heavy clay soils below 3,600 feet elevation. | The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during conducted in the spring of 2021. |
| Coulter’s goldfields <i>(Lasthenia glabrata ssp. coulteri)</i> CRPR List 1B.1 MSHCP CAPSA | Coulter’s goldfields is associated with low-lying alkali and saline habitats along the coast and inland valleys. The majority of the populations are associated with coastal salt marsh. In Riverside County, Coulter’s goldfields primarily grow in highly alkaline, silty clays associated with the Traver-Domino-Willows soils, and usually in the wet areas in the alkali vernal plain community. | The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during focused survey efforts. |
| Little mousetail <i>(Myosurus minimus ssp. apus)</i> CRPR List 3.1 MSHCP CAPSA | Little mousetail is widespread in California. It occurs in alkaline vernal pools, and vernal alkali plains and grasslands, and blooms March to June. | The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during focused survey efforts. |
| Mud nama <i>(Nama stenocarpum)</i> CRPR List 2.2 MSHCP CAPSA | Mud nama grows on muddy embankments of marshes and swamps, lake margins, riverbank, meadow, playa, and vernal pools. In western Riverside County, it is known only from the north shore of Mystic Lake (Roberts et al. 2004). | The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during focused survey efforts. |
| Spreading navarretia <i>(Navarretia fossalis)</i> FT/SE CRPR List 1B.1 MSHCP NEPSA | Spreading navarretia is a member of the phlox family, and is found in vernal pools, chenopod scrub, edge of marshes, and playas on saline-alkali soils. It occasionally grows in ditches and depressions associated with degraded habitat or old stock ponds (Consortium 2012). Spreading navarretia is a small prostrate to occasionally erect annual. Spreading navarretia blooms April to June. | The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during focused survey efforts. |

| Species Name (Scientific Name) Status | Habitat Description | Comments |
|--|--|--|
| <p>California Orcutt grass (<i>Orcuttia californica</i>)</p> <p>FE/SE CRPR List 1B.1 MSHCP NEPSA</p> | <p>California Orcutt grass is a small, unique grass that occurs primarily in vernal pool habitats. In southern California, it is known from Orange (recently reported occurrence), Los Angeles, Riverside, Ventura, and San Diego Counties, and continues south into Baja California, Mexico. California Orcutt grass blooms April to August. In Riverside County, this species is found in southern basaltic claypan vernal pools at the Santa Rosa Plateau, and alkaline vernal pools such as Skunk Hollow, at Upper Salt Creek near Hemet, Menifee and elsewhere.</p> | <p>The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite. The species was not detected onsite during focused survey efforts.</p> |
| <p>Wright's trichocoronis (<i>Trichocoronis wrightii</i> var. <i>wrightii</i>)</p> <p>CRPR List 2.1 MSHCP NEPSA</p> | <p>The historic known range of Wright's trichocoronis includes the Great Valley of central California, western Riverside County, and south Texas and adjacent northeast Mexico. This plant grows in meadows and seeps, marshes, riparian scrub, and vernal pools. Wright's trichocoronis blooms May to September.</p> | <p>The species is not expected to occur onsite based on a lack of suitable habitat and the highly disturbed and previously developed conditions documented onsite.</p> <p>The species was not detected onsite during focused survey efforts.</p> |
| <p>California Native Plant Society (CNPS): California Rare Plant Rank (CRPR)</p> <p>CRPR 1A – plants presumed extinct in California CRPR 1B – plants rare, threatened, or endangered in California, but more common elsewhere CRPR 2A – plants presumed extirpated in California but common elsewhere CRPR 2B – plants rare, threatened, or endangered in California but more common elsewhere CRPR 3 – plants about which we need more information, a review list CRPR 4 – plants of limited distribution, a watch list</p> <p>.1 – Seriously endangered in California .2 – Fairly endangered in California .3 – Not very endangered in California</p> <p>Federal (USFWS) Protection and Classification FE – Federally Endangered FT – Federally Threatened FC – Federal Candidate for Listing</p> <p>State (CDFW) Protection and Classification SE – State Endangered ST – State Threatened</p> | | |

MSHCP 6.3.2 Additional Survey Needs and Procedures

Amphibians

The Project Site does not occur within a predetermined Survey Area for amphibians (RCA GIS Data Downloads 2021).

The project is compliant with MSHCP Section 6.3.2.

Birds

The Project Site occurs completely within a predetermined Survey Area for the burrowing owl (*Athene cunicularia*) as shown in Attachment C, *MSHCP Relationship Map*. No burrows or structures representing suitable refugia or breeding resources were documented within the Project Site. The burrowing owl is currently not present within the Project Site. Focused surveys are not warranted. However, the species could colonize the property in the future. Therefore, a 30-day burrowing owl preconstruction surveys will be required to ensure protection for this species and consistency with the conservation goals as outlined in the MSHCP, **BIO-2, MSHCP 30-Day Burrowing Owl Preconstruction Survey**.

Following submittal, review and approval of the 30-day preconstruction survey report by the City of Perris and compliance with all species-specific conservation goals, if detected within or adjacent to the Project Site, the project will be compliant with MSHCP Section 6.3.2

Mammals

The Project Site does not occur within a predetermined Survey Area for mammals (RCA GIS Data Downloads 2021).

The project is compliant with MSHCP Section 6.3.2.

MSHCP Section 6.1.2 Riparian, Riverine, Vernal Pool Resources

No MSHCP Section 6.1.2 riparian, riverine or vernal pool resources were documented within or adjacent to the Project Site as shown in Attachment D, *Vegetation Communities Map*, and Attachments E and F, *Current Project Site Photographs*. Preparation of an MSHCP Determination of Biological Equivalent or Superior Preservation (DBESP) will not be required.

No evidence of vernal pools, seasonal depressions, seasonally inundated road ruts or other wetland features were recorded on the Project Site. Vernal pools are depressions in areas where a hard-underground layer prevents rainwater from draining downward into the subsoils. When rain fills the pools in the winter and spring, the water collects and remains in the depressions. In the springtime, the water gradually evaporates away, until the pools became completely dry in the summer and fall. Vernal pools tend to have an impermeable layer that results in ponded water. The soil texture (the amount of sand, silt, and clay particles) typically contains higher amounts of fine silts and clays with lower percolation

rates. Pools that retain water for a sufficient length of time will develop hydric cells. Hydric cells form when the soil is saturated from flooding for extended periods of time and anaerobic conditions (lacking oxygen or air) develop.

Consistent with conditions documented onsite and as previously stated, the Project Site is characterized as well drained substrates (drainage class). No indication of clay substrates or hydric soils were documented within the Project Site.

A review of historic aerials was conducted to determine if inundated features were present during years of high rainfall when features would certainly be documented. Historic aerials taken in 2011 represent an ideal baseline during which known (previously documented) inundated vernal pools, seasonal depressions and road ruts can easily be seen. No sign or indication of inundation was documented within the Project Site during a review of historic aerials.

In summary, none of the conditions (i.e., no inundated depressions including road ruts, hydric soils, historic inundation, etc.) were observed or documented within the Project Site. No potential habitat for Riverside fairy shrimp (*Streptocephalus woottoni*) or vernal pool fairy shrimp (*Branchinecta lynchi*) was documented within the Project Site. No additional surveys required.

No riparian scrub, forest or woodlands resources were documented within or adjacent to the Project Site. Therefore, no suitable habitat for the least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*) or western yellow-billed cuckoo (*Coccyzus americanus*) is present, as shown in Attachment D, *Vegetation Communities Map*, and Attachments E and F, *Current Project Site Photographs*.

the project will be compliant with MSHCP Section 6.1.2.

MSHCP Section 6.1.4 Guidelines Pertaining to the Urban/Wildlands Interface

The MSHCP Urban/Wildlands Interface guidelines presented in Section 6.1.4 are intended to address indirect effects associated with locating commercial, mixed uses and residential developments in proximity to a MSHCP Conservation Area. The Project Site is not located adjacent to an existing or proposed MSHCP Conservation Area.

The project is compliant with MSHCP Section 6.1.4.

MSHCP Section 6.4 Fuels Management

The fuels management guidelines presented in Section 6.4 of the MSHCP are intended to address brush management activities around new development within or adjacent to MSHCP Conservation Areas. The Project Site is not located adjacent to an existing or proposed MSHCP Conservation Area.

The project is compliant with MSHCP Section 6.4.

Stephens' Kangaroo Rat Fee Area

The Project Site falls within the Stephens' kangaroo rat (*Dipodomys stephensi*, SKR) Fee Area outlined in the Riverside County SKR Habitat Conservation Plan (HCP), **BIO-3, SKR Mitigation Fee**.

Jurisdictional Resources

No wetlands or jurisdictional resources regulated by the USACE, CDFW, or RWQCB were documented within or immediately adjacent to the Project Site, as shown in Attachment D, *Vegetation Communities Map*, and Attachments E and F, *Current Project Site Photographs*.

No regulatory permits or certifications are required.

California Department of Fish and Game Code Sections 3503, 3503.5, and 3513

The ornamental trees documented within and immediately adjacent to the Project Site are expected to potentially provide nesting habitat for common birds protected by California Department of Fish and Game Code (CDFG) Sections 3503, 3503.5, and 3513. The loss of an active nest would be considered a potentially significant impact. Standard required consistency with the CDFG Codes will ensure potential impacts to nesting birds and raptors are reduced to a level below significant, **BIO-4 Nesting Bird Compliance**.

SUMMARY OF MITIGATION & CONDITIONS OF APPROVAL REQUIREMENTS

The following section summarizes mitigation measures and conditions of approval which will need to be implemented to ensure development of the Project Site remains in compliance with CEQA, MSHCP and the Perris Valley Commerce Center Specific Plan Final EIR Mitigation Monitoring and Reporting Program.

BIO-1 MSHCP Local Development Mitigation Fee

The project applicant shall pay MSHCP Local Development Mitigation fees as established and implemented by the City of Perris.

BIO-2 MSHCP 30-Day Burrowing Owl Preconstruction Survey

Following is MM Bio 2 from the PVCCSP EIR, which is applicable to the Project. The required habitat assessment has been completed, as previously discussed.

Project-specific habitat assessments and focused surveys for burrowing owls will be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls will also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access. If ground disturbing activities in these areas are delayed or

suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.

If active nests are identified on an implementing project site during the pre- construction survey, the nests shall be avoided or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non- breeding season.

If burrowing owls occupy any implementing project site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Perris Planning Department and the CDFG. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The implementing project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation. If avoidance is infeasible, then a DBESP will be required, including associated relocation of burrowing owls. If conservation is not required, then owl relocation will still be required following accepted protocols. Take of active nests will be avoided, so it is strongly recommended that any relocation occur outside of the nesting season.

BIO-3 SKR Mitigation Fee

The Project Site falls within the SKR Fee Area outlined in the Riverside County SKR HCP. The project applicant shall pay the fees pursuant to County Ordinance 663.10 for the SKR HCP Fee Assessment Area as established and implemented by the County of Riverside.

BIO-4 Nesting Bird Compliance

Following is MM Bio 1 from the PVCCSP EIR, which is applicable to the Project.

In order to avoid violation of the MBTA and the California Fish and Game Code, site-preparation activities (removal of trees and vegetation) for all PVCC implementing development and infrastructure projects shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.

If site-preparation activities for an implementing project are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the implementing project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.

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Attachments

Attachment A – Regional Location Map

Attachment B – Project Site Map

Attachment C – MSHCP Relationship Map

Attachment D – Vegetation Communities Map

Attachment E - Current Project Site Photographs

Attachment F - Current Project Site Photographs

Attachment G – Soils Association Map

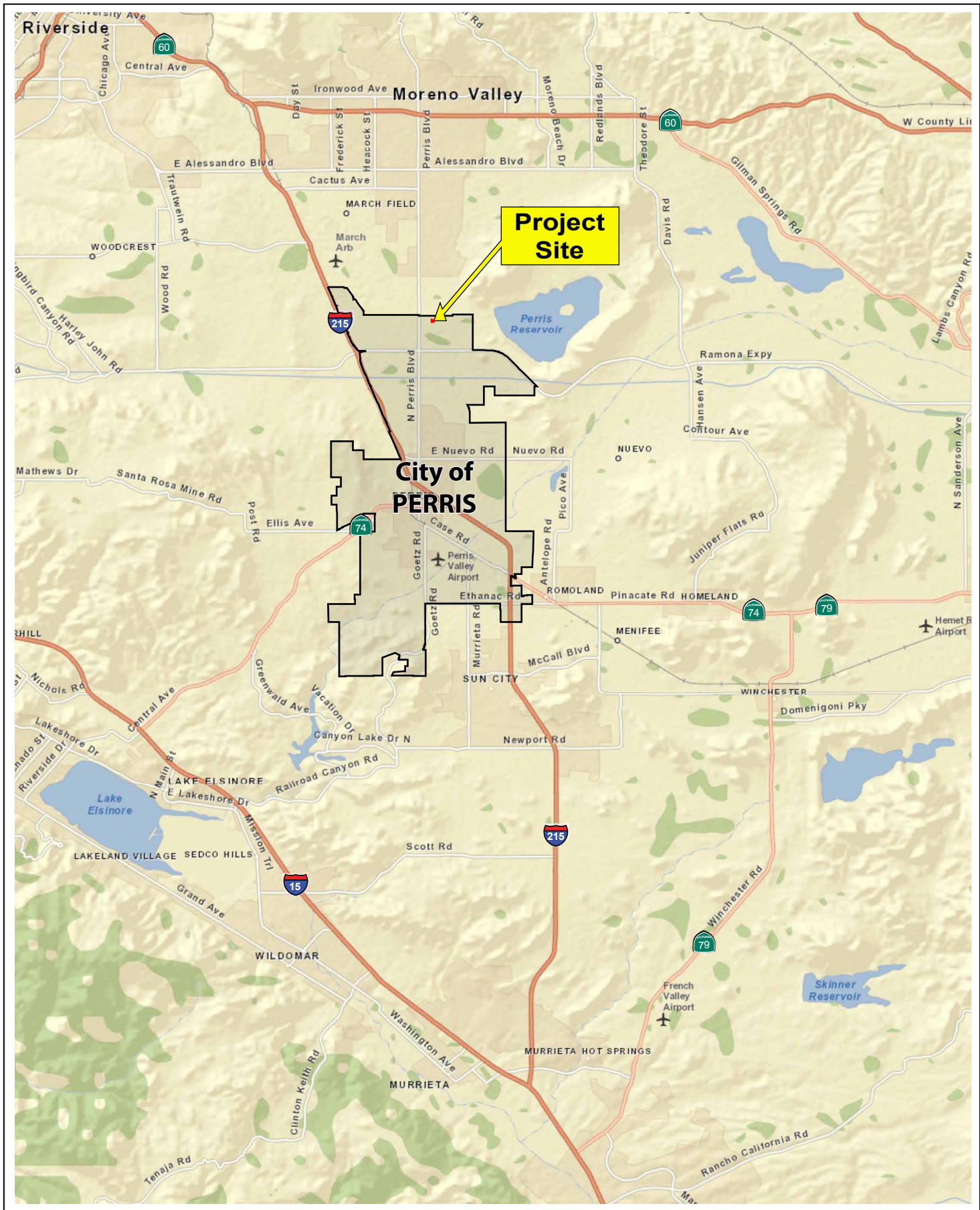
Attachment H – Project Site Impact Map

Certification

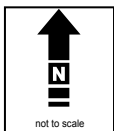
"I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief."

Author:  Date: June 21st, 2021

Fieldwork Performed By:  Date: June 21st, 2021

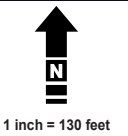


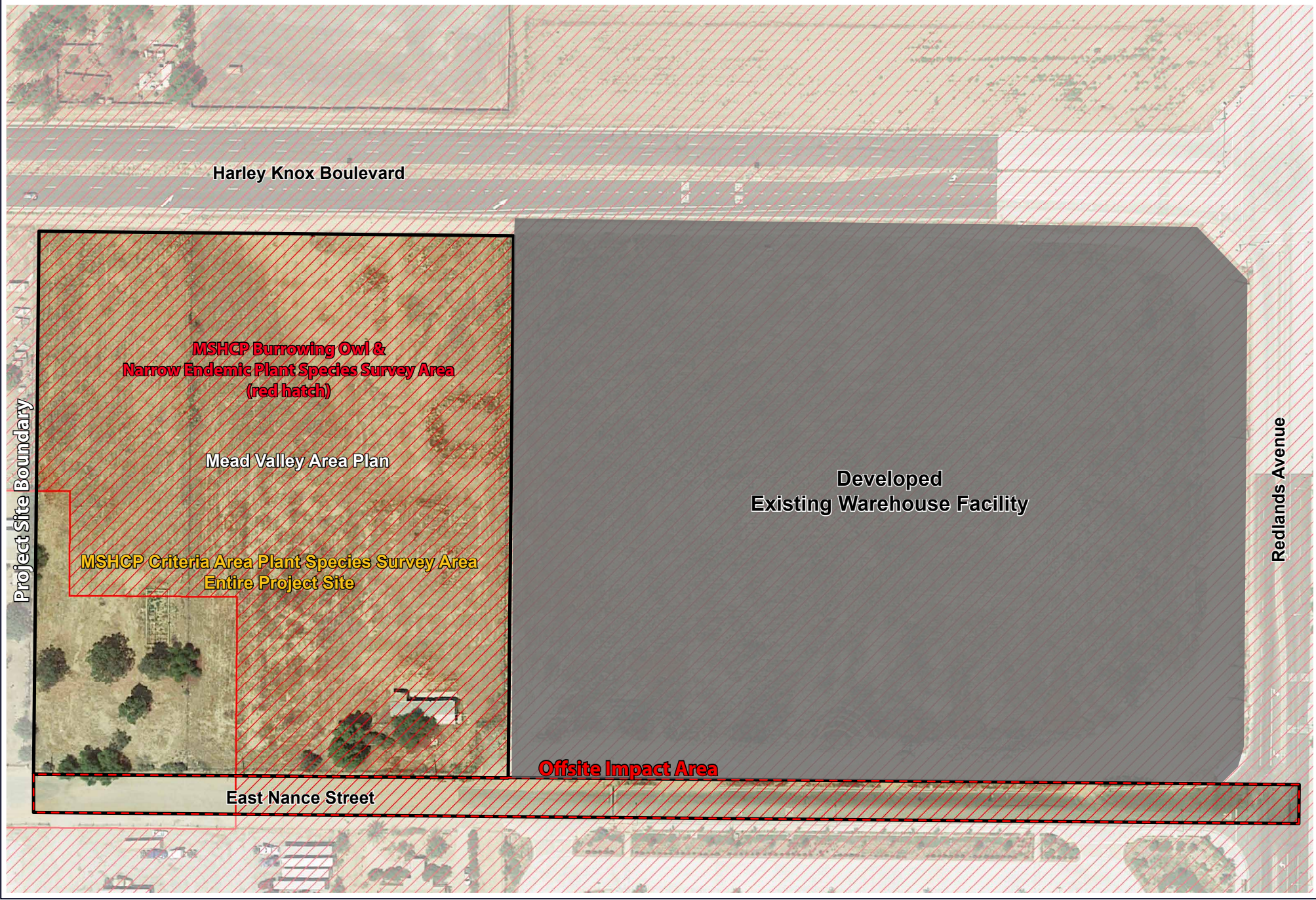
Attachment A - Regional Location Map
 MSHCP Consistency Analysis Report
 Harley Knox Commerce Center



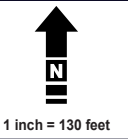


Attachment B - Project Site Map
MSHCP Consistency Analysis Report
Harley Knox Commerce Center



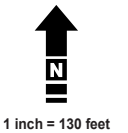


Attachment C - MSHCP Relationship Map
MSHCP Consistency Analysis Report
Harley Knox Commerce Center





Attachment D - Vegetation Communities Map
 MSHCP Consistency Analysis Report
 Harley Knox Commerce Center





PHOTOGRAPH 1 - Northwest view of Project Site from southeast corner adjacent to East Nance Street.



PHOTOGRAPH 2 - Southwest view of Project Site from northeast corner adjacent to Harley Knox Boulevard.

Refer to Attachment B for Photographic Key Map



PHOTOGRAPH 3 - Southeast view of Project Site from northwest corner adjacent to Harley Knox Boulevard.



PHOTOGRAPH 4 - Northeast view of Project Site from southwest corner adjacent to East Nance Street.

Refer to Attachment B for Photographic Key Map



Attachment G - Soils Association Map

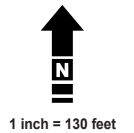
*MSHCP Consistency Analysis Report
Harley Knox Commerce Center*



1 inch = 130 feet



Attachment H - Project Site Impact Map
 MSHCP Consistency Analysis Report
 Harley Knox Commerce Center



Appendix A

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)
Sensitive Plant Surveys for the 6.43-Acre (1.22-Acre Offsite Impact Area) Harley Knox
Commerce Center Project Site, City of Perris, Western Riverside County, California