L&L ENVIRONMENTAL, INC.
REGULATORY SERVICES
BIOLOGICAL & CULTURAL INVESTIGATIONS & MONITORING

REVISED

WESTERN RIVERSIDE COUNTY MULTIPLE SPECIES HABITAT CONSERVATION PLAN DETERMINATION OF BIOLOGICALLY EQUIVALENT OR SUPERIOR PRESERVATION OAK VALLEY NORTH COMMERCE CENTER PROJECT 9950 AND 10300 CALIMESA BOULEVARD, CALIMESA, RIVERSIDE COUNTY, CALIFORNIA

±109.52 Acre Property, ±8.13 Acre Offsites, ±117.65+ Acres Surveyed

APNs 413-260-018, 413-280-016, 413-280-018, 413-280-021, 413-280-030, 413-280-036, 413-280-037, and 413-280-043, plus offsite areas on portions of 413-260-014, 413-260-017, 413-260-019, 413-260-020, and 413-260-052, Calimesa, Sections 24 and 25, Township 2 South, Range 2 West, USGS El Casco 7.5' Topographic Quadrangle

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Surveys Conducted: March to January 2023

Report Date: Aug 2023, Dec 2023 & February 2024

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1.0) EXECUTIVE SUMMARY

Birtcher Development proposes the Oak Valley North Commerce Center Project (Project). On behalf of Birtcher Development L&L Environmental, Inc. (L&L) conducted general and focused biological surveys between 2022 and 2024. The Study area is ±109.52 Acre Property, ±8.13 Acre Offsites, for a total of ±117.65+ Acres Surveyed.

This Determination of Biological Equivalent or Superior Preservation (DBESP) has been prepared to address Riparian/Riverine habitat and Vernal Pool resources only, as these are the only resources which require mitigation. All other issues have been addressed in the Biological Resources Assessment (L&L 2023) and the MSHCP Consistency Determination (L&L 2023) published separately. The goal of the DBESP is to demonstrate that the proposed mitigation is biologically equivalent or superior to the No Project Alternative using a functions and values test.

The proposed Project is identified as the Oak Valley North Commerce Center and consists of a ±95.6-acre business park and light industrial area with four (4) large warehouses and parking and a high-density residential or church land use area of ±11.2 acres (up to 223 dwelling units). The balance of the acreage (3.4 acres) would be designated as roadway. The offsite impact areas consist of road improvements along Calimesa Boulevard and Beckwith Avenue adjacent to the southwest and northeast Project site boundaries, respectively.

No naturally occurring vernal pools were observed on the site. Ponding water is present along Calimesa Boulevard and Beckwith Avenue that could provide potential fairy shrimp habitat. Dry season fairy shrimp surveys completed in the fall of 2023 found the common versatile fairy shrimp (*Branchinecta lindahli*) which does not require mitigation. Wet season survey results, winter 2023 through spring 2024, are consistent with the Dry Season Surveys finding only versatile fairy shrimp but will not be finished until the end of the wet season. In the event that listed fairy shrimp are found to be present within the Project prior to initiation of project related disturbances and the start of construction grading operations the Project applicant will purchase mitigation credits within the Skunk Hollow / Berry Jones Mitigation Bank or a mitigation bank that is determined to be acceptable to the City of Calimesa Planning Department, USFWS, and CDFW, in an amount not less than three (3) acres for every one (1) acre of impacted occupied pools. In the event that listed fairy shrimp are not observed within the Project site this mitigation measure will not be implemented and no mitigation for fairy shrimp shall be required.

Proposed mitigation for Project impacts to streambeds and natural drainage includes the purchase of mitigation credits at the Riverpark Mitigation Bank. The Project applicant will purchase 1.46 acres credits within the Riverpark Mitigation Bank for impact to 0.73 acre of non-riparian, riverine habitat. Of the 1.46 acres, at least 0.73 acres will be establishment credits through the purchase of rehabilitation, reestablishment and/or establishment mitigation credits. In the event that credits are not available other suitable method(s) will be determined in consultation with the Wildlife Agencies.

2.0) INTRODUCTION

The following report was prepared by L&L Environmental, Inc. (L&L) for Birtcher Development. It describes the proposed Project and its potential impacts on riparian/riverine habitat and vernal pool species.

DBESP Goals: The goal of the DBESP Report is to demonstrate that the proposed mitigation is biologically equivalent or superior to the existing conditions on the Project site if left undisturbed. This is completed by describing the functions and values of the resource pre- and post-project development relative to mitigation implementation.

DBESP Process: RCA has 14 calendar days following receipt of a complete application, including the DBESP (electronic copies of all documents) and full deposit, to issue comments requesting additional information or to issue JPR Findings to the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW), collectively referred to as the "Wildlife Agencies". The Wildlife Agencies, following receipt of the DBESP, have 60 working days to issue comments requesting additional information or provide concurrence. If comments are issued, it is not acceptable to provide a Response to Comments in lieu of fully revised supporting documentation. A completed report is required for the JPR record. A Response to Comments may be provided in addition to a fully revised DBESP Report. Once a complete, revised submittal is received by either the RCA or the Wildlife Agencies, the 14-day or 60-day clock, respectively, may start over.

2.1) Project Area

The Project site consists of Assessor's Parcel Numbers (APNs) 413-260-018, 413-280-016, 413-280-018, 413-280-021, 413-280-030, 413-280-036, 413-280-037, and 413-280-043, totaling ±109.52 acres. In addition, offsite road improvements will impact portions of APNs 413-260-014, 413-260-017, 413-260-019, 413-260-020, and 413-260-052, totaling ±8.13 acres. The combined total acreage is ±117.65.

The site is located in the City of Calimesa in Riverside County, California (Figure 1). Specifically, the site is located just northeast of Interstate 10 on the northeast side of Calimesa Boulevard about 500 feet southeast of Singleton Road. The Project site is in the USGS *El Casco, CA* (1979) quadrangle, interpolated Sections 24 and 25 of Township 2 South, Range 2 West (Figure 2). The survey area can be accessed by taking Interstate 10 to Calimesa and using the Singleton exit, continue south on Calimesa Boulevard to reach the northernmost boundary of the Project site.

The Project site is generally bounded as follows: to the southwest by Calimesa Boulevard and the I-10 freeway, with vacant lands, residential developments, and San Timoteo Canyon, the Norton Younglove Reserve, and the Badlands beyond; to the northwest by vacant lands and Singleton Road, with scattered commercial/industrial, mobile home community, and residential development

beyond; to the northeast by Beckwith Avenue, vacant lands, and residential development, with MSHCP conserved lands beyond; to the southeast by Ranch Calimesa mobile home community, vacant and agricultural lands and Cherry Valley Boulevard beyond (Figure 3).

2.2) Project Description

The proposed Project is identified as the Oak Valley North Commerce Center and consists of a ±95.6-acre business park and light industrial area with four (4) large warehouses and parking, and a high-density residential or church land use area of ±11.2 acres (up to 223 dwelling units). The balance of the acreage (3.4 acres) would be designated as roadway. The entire site will be impacted and all impacts will be permanent. An existing abandoned residence and other remnant structures and equipment present on the site will be removed. No staging areas are planned outside of the Project's development footprint.

The offsite impact areas consist of road improvements along Calimesa Boulevard and Beckwith Avenue adjacent to the southwest and northeast Project site boundaries, respectively. A portion of the western corner of the site and adjacent offsite areas along Calimesa Boulevard will be impacted by City road improvements that will be implemented prior to the construction of the Project (referred to in this report at the City Road Project Overlap Area).

Fuel Modification and construction staging will occur within the Project boundary and no additional lands will be impacted as a result.

Table 1. Project Impacts

Permanent Impacts		
Onsite	**Offsite**	**Total**
109.52	8.13	117.65

2.3) Existing Conditions

The site has been historically disturbed by rural residential uses. Two (2) unpaved driveways enter the site from Calimesa Boulevard. The northernmost driveway (identified as Roberts Road) leads to a vacant residence on a small hilltop, along with remnant foundations of other structures. The southernmost driveway (unnamed) leads to an area that previously had a number of structures (visible on 2006 aerial images) that are no longer present. Piles of old pipes and other debris are present, as well as remnants of old agricultural equipment and small structures. Fencing (mainly barbed wire) is present along portions of the site boundaries. Review of historic aerial images (Google Earth 2023, NETRonline 2023) shows that the site has been disturbed since at least 1959 and is regularly disked for weed abatement.

Topographically, the site is a mixture of relatively flat areas and low relief rolling hills, with elevations ranging from approximately 2,278 feet (694 meters) above mean sea level (amsl) to

approximately 2,413 feet (735 meters) amsl.

Soils onsite are mapped as Hanford, Ramona, Gorgonio, and Tujunga series, with Terrance Escarpments (Figure 4). All soils mapped on the property have a hydric rating of zero, with the exception of Tujunga loamy sand (TvC) that has a rating of 10 (Table 2).

Table 2. Mapped Soils.

Map unit symbol	Map unit name	Hydric Rating
GmD	Gorgonio gravelly loamy fine sand, 2 to 15 percent slopes	0
HcC	Hanford coarse sandy loam, 2 to 8 percent slopes	0
HcD2	Hanford coarse sandy loam, 8 to 15 percent slopes	0
RaD3	Ramona sandy loam, 8 to 15 percent slopes, severely eroded	0
RaC3	Ramona sandy loam, 5 to 8 percent slopes, severely eroded	0
TeG	Terrace escarpments	0
TvC	Tujunga loamy sand, channeled (0-8% slopes)	10

Vegetation onsite consists of non-native grasslands and wildflower fields, disturbed/developed areas and ornamental plants, with pockets of native coastal sage – chaparral scrub. Vegetation communities and impacts onsite are summarized in Table 3. Implementation of the Project will result in the permanent loss of ±4.13 acres of coastal sage – chaparral scrub and ±100.18 acres of non-native grasslands and wildflower fields (Table 3). No riparian or other sensitive vegetation communities are present and none will be impacted.

Table 3. Vegetation Communities Present.

Vegetation Community	Area Present (acres)					
	Project Site			City Road Project Overlap Area		
	Onsite	Offsite	Total	Onsite	Offsite	Total
Non-native Grasslands and Fields	100.18	0	100.18	0.70	0.21	0.91
Coastal Sage – Chaparral Scrub	3.91	0.22	4.13	0	0	0
Disturbed/Developed/Ornamental	5.43	7.91	13.34	0	0.47	0.47
Total	**109.52**	**8.13**	**117.65**	**0.70**	**0.68**	**1.38**

Project Within The MSHCP

The Project site is within Subunit 2: Badlands/San Bernardino National Forest of the MSHCP Pass Area Plan (Dudek 2003). The site is not located within an MSHCP Criteria Cell. MSHCP Proposed Constrained Linkage 23 is located about 0.25 mile north of the Project site.

Surveys required by the MSHCP are habitat assessments to address riparian/riverine and vernal pool habitats and associated species, burrowing owl (*Athene cunicularia*), and narrow endemic

plant species, including Marvin's onion (*Allium marvinii*) and many-stemmed Dudleya (*Dudleya multicaulis*). If suitable habitat is present, focused surveys are required.

3.0) RIPARIAN/RIVERINE MITIGATION (SECTION 6.1.2)

3.1) Methods

3.1.1) Pre-Survey Research Methods and Purpose

Section 6.1.2 of the MSHCP requires the evaluation of sites for riparian and/or riverine areas, vernal pools and suitable habitat for listed fairy shrimp and riparian birds (least Bell's vireo, southwestern willow flycatcher and western yellow-billed cuckoo).

The MSHCP defines Riparian/Riverine Areas as "lands which contain habitat dominated by trees, shrubs, persistent emergent, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source, or areas with freshwater flow during all or a portion of the year." Regarding artificially created features, the MSHCP states "with the exception of wetlands created for the purpose of providing wetland habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, areas demonstrating characteristics as described above, which are artificially created are not included.

Vernal pools are defined as "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 wetland 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 way 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.

3.1.2) Riparian/Riverine Field Survey Methods and Purpose

Project boundaries were investigated to identify areas where water is received onto the property or transmitted offsite to downstream resources. These areas were then walked, measured, and assessed via three (3) criteria to determine presence or absence of evidence of flow, hydrophilic vegetation, or hydric soil conditions. During our analysis, L&L personnel used indicators of riparian vegetation as shown in Table 4.

Table 4. Summary of Wetlands Vegetation Criteria.

Category	Probability
Obligate Wetland (OBL)	Almost always occur in wetlands (estimated probability >99%)
Facultative Wetland (FACW)	Usually occur in wetlands (Estimated probability 67%-99%)
Facultative (FAC)	Equally likely to occur in wetlands and non-wetlands (est. probability 34%-66%)
Facultative Upland (FACU)	Usually occur in non-wetlands (estimated probability 67%-99%)
Obligate Upland (UPL)	Almost always occur in non-wetlands (estimated probability >99%)

During our investigation, the property was also searched for vernal pools. To meet the definition of a vernal pool three (3) factors must be addressed: (1) suitable soil and soil conditions, (2) proper hydrology, and (3) one or more indicator species. Soils were examined both as mapped and in the field during transect surveys. The site was also examined for vernal pool plant species during biological surveys conducted in 2022.

Hydrology was examined and documented during the jurisdictional delineation conducted in 2022 and surveyors looked for evidence of ponding water and persistent wetness (Figure 7). Dry season seasonal depressions were examined for potential to retain water for periods of time long enough to become habitat for fairy shrimp (Figure 7). Aerial photos were examined for potential ponding areas and where ponding was identified dry season sampling occurred.

3.1.3) Focused Fairy Shrimp Survey Methods

Habitat Assessment

Biologist Garrett Huffman (TE-20186A-3.2) of Huffman Environmental conducted an assessment of the Project site in October 2023 to determine habitat suitability for supporting fairy shrimp. Additional details can be found in the dry season fairy shrimp report contained in the Biological Resources Assessment.

Dry Season Focused Survey for Fairy Shrimp

Dry season soil samples were collected from the Project site on October 13, 2023, in accordance with the USFWS Survey Guidelines for Listed Large Branchiopods (USFWS 2017). Dry sample collections were conducted by Garrett Huffman.

Soil samples were collected when the soil (substrate) was dry. A hand spade was used to collect the sample at each feature taking from the top 1 to 3 centimeters of pool sediment. The USFWS Survey Guidelines provide a formula recommending the number of samples collected per feature based on the approximate size of the feature in square meters. Six ponding features were estimated to be between 2.5 and 24 square meters (0.005 acres), requiring a minimum of 10 collected soil samples for each. Four features were estimated to be between 25 and 235 square

meters (0.05 acres), requiring a minimum of 25 collected soil samples. Regardless of feature size, all samples were collected in volumes of 50 to 100 milliliters each. Each sample was collected from the lowest topographic areas within the pool to maximize the potential detection of cysts.

Biologist Charles Black (TE-835549-8) of Ecological Restoration Service conducted dry sample processing and cyst hatching. Soils were processed and examined for cyst presence. Project samples were hydrated for approximately 1-2 hours in tap water and then washed through a set of sieves. The material was passed through a Number 45 (.0139") USA Standard Testing Sieve, A.S.T.M.E.-11 specification, and caught on a Number 70 (.0083") sieve. The filtered material was then rinsed into a container with approximately 50 millimeters of a saturated brine solution to float organic material, including fairy shrimp cysts. The material floating on the brine was decanted onto a paper filter on a filter funnel, and water was removed through the filter paper by vacuum suction. A 6.3-570x power Olympus SZX9 Zoom Stereo Microscope was used to examine the remaining material. Distinctive fairy shrimp cysts, if present, were individually counted (if less than approximately 50) or estimated (for larger numbers) by examining ¼ or ½ subsections of the filter and multiplying the subset by the appropriate factor. The presence and number of ostracod shells and cladoceran ephippia (if any) were also noted in samples.

Cysts were then cultured for identification. Individual Project samples were combined by pool number and hydrated in approximately 500 ml of Arrowhead Mountain Spring water. Plastic culture tubs were placed in a shady location in a San Diego outdoor location (night low temperatures in the low to mid-60s, daily highs in the low 70s to high 80s). Two days after hydration, cultures were fed with several ml of a yeast culture produced by dissolving a gram of table sugar and a gram of instant dry yeast in 50 ml 95 F degree filtered water. Water was added daily to tubs to replace water lost to evaporation. Mature shrimp were removed periodically from each culture as they became large enough to identify and examined under an Olympus Zoom dissecting microscope.

Additional details can be found in the dry season fairy shrimp report provided in Appendix K.

Wet Season Focused Survey for Fairy Shrimp

Wet season protocol surveys for fairy shrimp are in progress and will be completed in early 2024. Wet season surveys are being conducted by Garrett Huffman in accordance with the USFWS Survey Guidelines for Listed Large Branchiopods (USFWS 2017).

Per the USFWS (2017) Guidelines, the wet season generally occurs in California between October and June. Wet season surveys commence once appropriate habitat has become inundated.

Appropriate habitat is considered to be inundated when it holds greater than 3 centimeters of standing water 24 hours after a rain event.

All potential habitat must be adequately sampled at 7-day intervals after initial inundation of habitat. Sampling will continue within each potential habitat until it dries or a minimum of 120 consecutive days of inundation has occurred. Sampling will be reinitiated within 7 days of an individual habitat drying and inundating during the same wet season.

At each wet season visit, representative portions of the bottom, edges, and vertical water column of the feature shall be adequately sampled using a seine, dip net or aquarium net appropriate for the size of the feature. Data collected for the feature includes average and maximum water depth, water and air temperature, length, width, degree and form of disturbance, presence of fairy shrimp, and observations of any other benthic macroinvertebrates. Vouchering of the species collected will be conducted and delivered to the LA History Museum per USFWS Protocol Guidelines. Survey visits will be discontinued after the features go dry for the season.

3.2) Results/Impacts

Four (4) drainages (no blueline streams) are present onsite (Figure 5). Two (2) flow in a general north to south direction across the property and two (2) in a southeast to northwest direction, including a manmade drainage ditch running parallel to Calimesa Boulevard near to the southeastern corner (Figure 5). Ponding is present within depressions along the shoulder of Calimesa Blvd and within the driving lanes of Beckwith Avenue (Figure 7).

Soil Survey Geographic (SSURGO) Database shapefiles and Web-Soils identify soils onsite as sandy loams, with a few small areas of terrace escarpments (see Figure 4). All soils mapped on the property have a hydric rating of zero, with the exception of Tujunga loamy sand (TvC) that has a rating of 10 (see Table 2).

3.2.1) Riparian/Riverine Habitat

Of the four (4) drainages present three (3) ephemeral drainages are MSHCP riverine features totaling 0.73 acres. One (1) manmade excavated roadside ditch measuring 0.12 acres is present in the southeast corner but is not subject to MSHCP Section 6.1.2 as it was created in an otherwise upland area, receives only urban run-off and is not connected to natural upstream drainages.

Table 5. MSHCP Riverine Features.

Name	Average Width (ft.)	Square Feet (acres)	Type of Waters	Lat/Long	HGM Code
D1	12.4	21,132 (0.49)	Riverine Streambed	33°58'41.96"N 117° 2'28.59"W	Riverine
D2	9.9	5,855 (0.13)	Riverine Streambed	33°58'41.02"N 117° 2'25.47"W	Riverine
D3	Manmade	Manmade	Manmade	33°58'19.85"N 117° 2'23.74"W	Manmade
D4	5.05	4,850 (0.11)	Riverine Streambed	33°58'32.81"N 117° 2'5.52"W	Riverine
Total		31,837 (0.73)			

All areas of the property will be impacted by planned development and include 31,837 sq. ft. (0.73 acre) of MSHCP riverine habitat (Figure 6).

Riparian

There is no native or MSHCP riparian habitat located onsite consequently no impact will occur to riparian habitat.

Riverine Features

Drainage 1/Riverine 1

Drainage 1 (D1)(R1) is a 21,132 sq. ft. (0.49 acre) drainage that enters the Project at Beckwith Avenue via an excavated ditch and extends southward. Average width of (D1)(R1) is 12.4 ft. (D1)(R1) is primarily unvegetated or contains isolated upland vegetation and is regularly disturbed. It is poorly defined away from the northernmost portion onsite. Portions are compacted or recently tilled. Dominant vegetation is non-native grasses, mustard, and *Amsinckia*. Water was not present on the days of surveys. (D1)(R1) qualifies as a state streambed and MSHCP riverine habitat (Table 5).

Drainage 2/Riverine 2

Drainage 2 (D2)(R2) is 5,855 sq. ft. (0.13 acre) and enters the Project at Beckwith Avenue via a swale and extends southward for a short distance, where it terminates in friable soils. The average width measurement is 9.9 ft. (D2)(R2) is unvegetated or contains upland vegetation. It is poorly defined away from the northern origins. (D2)(R2) is regularly disturbed by discing or tilling of the soils. Dominant vegetation includes mustard, *Amsinckia*, ornamental and non-native trees (almond and tree of heaven). Water was not present on the days of the surveys. (D2)(R2) is a state streambed and MSHCP riverine habitat (Table 5).

Drainage 4/Riverine 4

Drainage 4 (D4)(R4) is a streambed originating at the northeast corner of the property, running in a westward direction parallel to Beckwith Avenue. (D4)(R4) measures 4,850 sq. ft. (0.11 acre) with an average width of 5.05 ft. (D4)(R4) is unvegetated or contains upland species with compacted soils and poorly defined beds and banks. It is regularly disturbed by offroad vehicles, discing, or tilling and has been cut off from natural upstream flows by the adjacent trailer park development. Dominant vegetation is non-native grasses, *Amsinckia* sp., and *Artemisia californica-Erigonum fasciculatum*. Water was not present on the days of the surveys. (D4)(R4) qualifies as a state streambed and MSHCP riparian habitat (Table 5).

Non-Riverine Feature

Drainage 3

Drainage 3 (D3) is an excavated/manmade roadside ditch parallel to Calimesa Boulevard near the southeast corner of the Project and adjacent to a row of ornamental trees. D3 is clearly excavated to a depth of -2 or -3 feet measuring 5,418 sq. ft. (0.12 acre) with an average width of 6.8 ft. Portions of the ditch have broken concrete or grouted and ungrouted riprap and spots have been lined with concrete. D3 is unvegetated or contains non-native ornamental vegetation. A landscape feature consisting of a planted row of non-native trees is present along the property boundary adjacent to the drainage. No water was present on the survey days. D3 qualifies as a state Streambed but is not considered MSHCP riparian/riverine, as it is manmade in an otherwise upland area. A detailed analysis of this feature can be found in the Jurisdictional Delineation and the Biological Resources Assessment (L&L 2023).

3.2.2) Riparian/Riverine Species

Riparian Birds

The Project will not impact riparian birds. The Project is consistent with MSHCP Section 6.1.2. with regard to these species and their habitat. No mitigation is proposed. Details are included in the Biological Resources Assessment in Appendix A.

Fairy Shrimp

Soil types mapped on the site are not consistent with an alkali playa or vernal pool complex (Bauder et al 2011). Pools or depressions characteristic of naturally occurring vernal habitat were not observed on the site and no wetland or vernal pool plant species were present. No evidence of ponding (i.e., cracked soils, tire ruts, etc.) was observed on the site during surveys in 2020 or 2022. However, surveys in 2023 observed ponded water in offsite areas along Calimesa Boulevard and Beckwith Avenue.

No MSHCP species listed for protection associated with riparian/riverine areas and vernal pools were observed. A habitat assessment found ten features within the Project site with evidence of ponding water suitable to support fairy shrimp. These features consist of tire ruts and tracks, low-lying areas within dirt roads, and drainage ditches (Figure 7). A dry season survey was conducted in October 2023. Examination of the dry season samples found fairy shrimp cysts in samples from two of the features (OV-4 and OV-5) (Figure 8). The cysts were cultured and the resulting nauplii (larval fairy shrimp) were raised to the point where they had matured sufficiently to be identified to species. Only the common versatile fairy shrimp was found in the dry season samples. Additional details regarding the dry season survey results can be found in the dry season fairy shrimp survey report in Appendix K.

Wet season surveys are in progress at this time (February 2024) and have been consistent with the dry season surveys. Only the common versatile fairy shrimp has been identified. Surveys will be completed at the end of the wet season in early 2024. If listed fairy shrimp are present, impacts to listed fairy shrimp species would be less than significant with mitigation as described in Section 3.2.3 and 3.3.7, and the Project would be consistent with Section 6.1.2 of the MSHCP.

3.2.3) Functional Analysis

Flood Storage and Flood Flow Modification

In its current condition, flood storage and flood flow modification can occur as flows enter the Project site and encounter tilled soils (D1, D2 and D4). This soil reduces the volume and velocity of flows to the point where in the current condition received waters are not transported all the way across and off the site.

In the post-project developed condition, the Project site will utilize a combination of best management practices (BMPs) (see Section 3.3.4) to provide water quality control measures and to transmit clean water to downstream habitat. To prevent erosion, peak flows will be regulated to the pre-project condition. Low flows generated by the proposed development will be processed and released to downstream habitat. Episodic high flow events will be received from upstream open space habitat and transmitted to downstream habitat. To develop a better understanding of the current and historic condition of the ephemeral drainages we examined available Google Earth photos spanning 26 years between 1996 and 2022, including 25 photos.

While determining flows from an aerial photo can be difficult and somewhat misleading due to timing of the photos, it can be helpful to inform flood storage and flood flow modification rates. We then averaged rainfall rates from the two (2) nearest data points (Beaumont and Cranston) and matched photos to try to better understand transmission rates. We found 20 photos where there was no evidence of flows leaving the site and five (5) photos where at least some evidence of flows

leaving the property is present in the form of changes in soils texture and color. Flows were transported off the property in 1996, 2002, 2003, 2011, and 2012, but no evidence of flows leaving the site in the last decade.

Nutrient Retention

Flows received into the Project site are both runoff from natural open spaces and low flows and urban runoff from developments to the north. The existing riverine features contain annual vegetation and soils that would be expected to perform biogeochemical cycling functions and improve water quality, particularly with regard to nitrogen, sulfur, and phosphorous content. These substances will likely settle out of the water when the velocity is reduced by obstruction, but annual grasses and forbs are also expected to absorb and utilize nutrient content naturally during growth processes and thereby reduce these substance levels in the water.

In the post-project condition, after construction and development, the Project will utilize a combination of BMPs (see Section 3.3.4) for flows and the removal of increased nutrient content. Onsite drainage features will allow for improved water quality naturally by intercepting surface runoff and removing or retaining received sediments. These sediments are then available for soil development. In high flow, short-term high-energy events sediments and soil are available for transport to downstream habitat.

Sediment Transport

In the current condition, water is exposed to tilled and loosened soils that quickly absorb low-flow, short-term low energy events. There is no evidence that water is crossing the Project in drought conditions.

After construction, the Project will utilize a combination of BMPs (see Section 3.3.4) that will allow most sediments in received low flows to settle out, though high flow events could continue to transport sediments to downstream habitats to aid in soil development and support wetland vegetation.

Toxicant Trapping

In the current condition, water that comes into the site might be exposed to hazardous materials associated with normal residential use, including cleaning products, solvents, herbicides, and insecticides as well as those associated with rural residential use, such as tractors and other small scale agricultural equipment.

The Project has been designed to utilize Water Quality Best Management Practices (BMPs), including education, storm drain stenciling, and street sweeping in compliance with City of Calimesa requirements. The Project would result in the additional use of hazardous materials in limited quantities associated with normal residential use. However, compliance with label

instructions will reduce potential risk of hazardous materials released to downstream waters. An information pamphlet will be prepared for each tenant and property management group and include information on safe application of industrial and landscape chemicals and avoiding discharge to downstream waters. In addition, the proposed Project will utilize a combination of extended detention basins, infiltration basins, and sand filter basins to collect low flows and first flush storm runoff to trap toxicants.

Public Use

Currently, onsite riverine habitat provides no public use. Although wetlands and riverine habitat can provide many aesthetic and cultural functions and contain native species that have value, vegetation onsite is sparse and there is no public access.

Wildlife Habitat

Currently, the Project site supports no riparian bird habitat. Habitat to support common versatile fairy shrimp is present onsite. No listed fairy shrimp have been identified in onsite pools as of February 2024, but focused wet season surveys will not be complete until the end of the wet season survey.

If listed fairy shrimp are present the proponent would either conserve 90% of the occupied habitat (including the surrounding hydrology) that provides for long-term conservation value on the Project site or compensate for the loss of occupied habitat through purchase of preservation credits at a 3:1 ratio (preserved habitat : occupied habitat) at the Barry Jones / Skunk Hollow mitigation bank or a mitigation bank that is determined to be acceptable to the City of Calimesa Planning Department, USFWS, and CDFW.

The habitat within the Project site consists of manmade depressions over an area of less than 0.2 acres that are not underlain by suitable soils and do not support vernal plants or other vernal species. The potential habitat area is small and isolated. The Project site is regularly disturbed and is surrounded (for the most part) by areas that are already developed residential or infrastructure that could expose the habitat to residential contaminants, illegal dumping and other urban impacts. The habitat within the Project site does not have long-term conservation value for listed fairy shrimp species. Mitigation through the purchase of preservation credits at a 3:1 ratio (preserved habitat : occupied habitat) at the Barry Jones / Skunk Hollow mitigation bank or a mitigation bank that is determined to be acceptable to the City of Calimesa Planning Department, USFWS, and CDFW would provide a biologically equivalent or superior preservation by preserving healthy naturally occurring vernal habitat that supports a variety of vernal species and is part of a large contiguous block of habitat.

3.2.4) Project Alternatives

Full Avoidance Alternative

The Project is proposed on a developed residential parcel, therefore the full avoidance alternative to the Project would allow continued use and resulting disturbances related to residential or agricultural land uses. This would continue to reduce habitat value onsite and continue to have the potential to impact downstream resources. Table 6 lists the functions and values of the current condition of the Project site.

Full avoidance of these impacted resources is not consistent with the conservation goals of the MSHCP which allows for development within lands that are currently disturbed and surrounded by other development as a priority over the development of more remote less disturbed habitat with long term conservation value. The reuse of this land for development is therefore an appropriate use and the full Avoidance Alternative is not consistent with the spirit and the purpose of the MSHCP.

Table 6. Functions and values assessment.

Resource Functions	Long Term Conservation Value / Resource Value Impacted Riverine Habitat	Long Term Conservation Value / Resource Value Bank Riverine Habitat
Flood Storage and Flow Mod.	Low/moderate	Moderate
Toxicant Trapping	Low/Moderate	Moderate
Nutrient Retention & Trans	Low/Moderate	Moderate
Public Use	Nil	Nil
Wildlife Habitat	Low	Moderate

3.3) Mitigation and Equivalency

3.3.1) Direct Effects

Construction and Grading Operation

Grading would commence with grubbing and vegetation clearing, followed by rough grading. Excavators, dozers, tractors/loaders/backhoes, scrapers, graders, compactors, dump trucks, cranes, water trucks, concrete mixers, pavers and paving equipment, water trucks, forklifts, and miscellaneous other equipment will be used.

The Project will impact 0.73 acre of non-riparian, riverine resources but will mitigate impacts through a mitigation bank. The Project may impact pools occupied by listed fairy shrimp (none identified to date). Impacts to listed fairy shrimp (if they are identified) will be mitigated through a mitigation bank. Implementation of the mitigation will provide enhanced functions and values over the current condition.

Summary of Effects on Conserved Habitats

- The Project will impact 0.73 acre of non-riparian riverine resources.
- The Project may impact pools occupied by listed fairy shrimp (none identified to date).
- Because the Project applicant is purchasing mitigation credits prior to Project impacts no temporal loss is anticipated as a result of the proposed Project.
- After mitigation, the Project will not result in a net loss of non-riparian, riverine habitat.

Summary of Effects on Linkages and Functions of the MSHCP Conservation Area

- The Project is not in an MSHCP Criteria Cell.
- The Project will not impact MSHCP designated linkage(s).
- The Project will have a beneficial impact on transmitted water and water quality on downstream ESA and Conserved Lands. Runoff from the development and offsite flows will be treated in a series of water quality basins, detention basins, or other BMPs as approved by the City of Calimesa. The BMPs shall remove common pollutants and reduce peak flows and runoff before discharging offsite into the existing drainage system under the I-10 freeway.
- After completion of the Project water flows would continue to the same drainage system at similar levels and downstream connectivity would not be impacted.

3.3.2) Indirect Effects

Indirect impacts to habitat in the immediate Project vicinity could potentially occur as a result of erosion and runoff, fugitive dust, and invasive species during construction. Development of the site will reduce pervious surfaces and as a result reduce absorption of rain events and increase runoff. Use of heavy equipment and maintenance of those vehicles and use of other toxic substances in construction could result in accidental spills, leaks, or other release into the surrounding and downstream environment. Similarly, after development an increased presence of vehicles, landscaping chemicals, household cleaners, and other toxins could result in accidental spills, leaks, or otherwise be released into the environment.

Fugitive dust generated by construction activities can affect the health of local wildlife and plants. Dust particles settling directly on adjacent vegetation can cause physical shading, thus reducing photosynthesis, blocking leaf stomata, and/or uptake into leaf tissues (Farmer 1993). These impacts can most notably reduce vegetation growth and reproduction rates.

Post-project fugitive dust long-term impacts are expected to be similar or less than the current levels due to current regular tilling of the soils.

A potential increase in non-native species, which may impact surrounding or downstream native

plant species, may occur along Project margins where newly exposed soils not developed or landscaped could provide fertile ground. Invasive species occurring within the impact area could disperse seed to surrounding or downstream areas and newly turned and exposed soils within the Project site. Invasive and noxious weed species seeds could be spread or introduced into the area by vehicles or machinery.

With the incorporation of the Mitigation Measures outlined in Section 3.3.4, indirect impacts will be minimized to a level that is considered less than significant.

3.3.3) Urban Wildlands Interface

This section is intended to identify actions that can minimize edge effects where the development interacts with an MSHCP Conservation Area. The Project site is not located within or immediately adjacent to an MSHCP Conservation Area.

Urban Wildland Interface Guidelines require that projects address indirect effects associated with locating development in proximity to MSHCP Conservation Areas, where applicable. These effects are drainage, toxics, lighting, noise, invasives, barriers, and grading/land development. Due to the distance and existing development between the Project site and PQP or other conserved lands, there would be no substantial indirect effects associated with lighting, noise, barriers, or grading/land development and these effects are not addressed further.

Drainage and Toxics

Flows leaving the site connect hydrologically to downstream drainages and toxics have the potential to impact habitat and water quality. The potential indirect effects associated with drainage and toxics will be mitigated through implementation of a Water Quality Management Plan (WQMP). Additionally, the Project would be required to comply with all applicable water quality regulations, including obtaining and complying with those conditions established in a Regional Water Quality Control Board Waste Discharge Requirements and a National Pollutant Discharge Elimination System (NPDES) permit. Both of these permits include the treatment of all surface runoff from paved and developed areas, the implementation of applicable Best Management Practices (BMPs) during construction activities, and the installation and proper maintenance of structural BMPs to ensure adequate long-term treatment of water before it enters into any stream course.

Invasives

Under MSHCP Section 6.1.4, when approving landscape plans for development that is proposed adjacent to MSHCP Conservation Area, Permittees shall consider the invasive, non-native plant species listed in MSHCP Table 6-2 (included below) and shall require revisions to landscape plans (subject to the limitations of their jurisdiction) to avoid the use of invasive species for the portions

of development that are adjacent to MSHCP Conservation Area. Landscape plans for the Project shall avoid use of all invasive, non-native plant species listed in MSHCP Table 6-2.

Table 7. MSHCP Avoided Plants List

MSHCP Table 6-2. Plants That Should Be Avoided Adjacent to MSHCP Conservation Area (Taken Directly from MSHCP Section 6.1.4)

BOTANICAL NAME	**COMMON NAME**
Acacia spp. (all species)	acacia
Achillea millefolium var. *millefolium*	common yarrow
Ailanthus altissima	tree of heaven
Aptenia cordifolia	red apple
Arctotheca calendula	cape weed
Arctotis spp. (all species & hybrids)	African daisy
Arundo donax	giant reed or arundo grass
Asphodelus fistulosus	asphodel
Atriplex glauca	white saltbush
Atriplex semibaccata	Australian saltbush
Carex spp. (all species*)	sedge
Carpobrotus chilensis	ice plant
Carpobrotus edulis	sea fig
Centranthus ruber	red valerian
Chrysanthemum coronarium	annual chrysanthemum
Cistus ladanifer (incl. hybrids/varieties)	gum rockrose
Cortaderia jubata [*syn.C. Atacamensis*]	jubata grass, pampas grass
Cortaderia dioica [syn. *C. sellowana*]	pampas grass
Cotoneaster spp. (all species)	cotoneaster
Cynodon dactylon (incl. hybrids varieties)	Bermuda grass
Cyperus spp. (all species*)	nutsedge, umbrella plant
Cytisus spp. (all species)	broom
Delosperma 'Alba'	white trailing ice plant
Dimorphotheca spp. (all species)	African daisy, Cape marigold
Drosanthemum floribundum	rosea ice plant
Drosanthemum hispidum	purple ice plant
Eichhornia crassipes	water hyacinth
Elaegnus angustifolia	Russian olive
Eucalyptus spp. (all species)	eucalyptus or gum tree
Eupatorium coelestinum [syn. *Ageratina* sp.]	mist flower
Festuca arundinacea	tall fescue
Festuca rubra	creeping red fescue
Foeniculum vulgare	sweet fennel
Fraxinus uhdei (and cultivars)	evergreen ash, shamel ash
Gaura (spp.) (all species)	gaura
Gazania spp. (all species & hybrids)	gazania
Genista spp. (all species)	broom
Hedera canariensis	Algerian ivy
Hedera helix	English ivy
Hypericum spp. (all species)	St. John's Wort
Ipomoea acuminata	Mexican morning glory
Lampranthus spectabilis	trailing ice plant
Lantana camara	common garden lantana
Lantana montevidensis [syn. *L. sellowiana*]	lantana
Limonium perezii	sea lavender

Linaria bipartita	toadflax
Lolium multiflorum	Italian ryegrass
Lolium perenne	perennial ryegrass
Lonicera japonica (incl. 'Halliana')	Japanese honeysuckle
Lotus corniculatus	birdsfoot trefoil
Lupinus arboreus	yellow bush lupine
Lupinus texanus	Texas blue bonnets
Malephora crocea	ice plant
Malephora luteola	ice plant
Mesembryanthemum nodiflorum	little ice plant
Myoporum laetum	myoporum
Myoporum pacificum	shiny myoproum
Myoporum parvifolium (incl. 'Prostratum')	ground cover myoporum
Oenothera berlandieri	Mexican evening primrose
Olea europea	European olive tree
Opuntia ficus-indica	Indian fig
Osteospermum spp. (all species)	trailing African daisy, African daisy,
Oxalis pes-caprae	Bermuda buttercup
Parkinsonia aculeata	Mexican palo verde
Pennisetum clandestinum	Kikuyu grass
Pennisetum setaceum	fountain grass
Phoenix canariensis	Canary Island date palm
Phoenix dactylifera	date palm
Plumbago auriculata	cape plumbago
Polygonum spp. (all species)	knotweed
Populus nigra 'italica'	Lombardy poplar
Prosopis spp. (all species*)	mesquite
Ricinus communis	castorbean
Robinia pseudoacacia	black locust
Rubus procerus	Himalayan blackberry
Sapium sebiferum	Chinese tallow tree
Saponaria officinalis	bouncing bet, soapwart
Schinus molle	Peruvian pepper tree, California pepper
Schinus terebinthifolius	Brazilian pepper tree
Spartium junceum	Spanish broom
Tamarix spp. (all species)	tamarisk, salt cedar
Trifolium tragiferum	strawberry clover
Tropaelolum majus	garden nasturtium
Ulex europaeus	prickly broom
Vinca major	periwinkle
Yucca gloriosa	Spanish dagger

An asterisk (*) indicates some native species of the genera exist that may be appropriate.
Sources: California Exotic Pest Plant Council, United States Department of Agriculture-Division of Plant Health and Pest Prevention Services, California Native Plant Society, *Fremontia* Vol. 26 No. 4, October 1998, *The Jepson Manual: Higher Plants of California*, and County of San Diego Department of Agriculture.

3.3.4) Avoidance and Minimization

The Project is adjacent (for the most part) to areas that are already developed. Impact to wildlife species will be minimized by grading and clearing land outside of the breeding season (January 1 to September 15). If any vegetation removal is to occur during the breeding season, a qualified biologist will conduct preconstruction nesting bird clearance surveys and establish buffer zones (300 to 500 feet or as the Project biologist directs) around any nesting or other reproducing animal in order to minimize impact. The Project incorporates standard water quality BMPs into Project implementation. BMPs reduce potential for indirect impacts to adjacent and downstream habitats.

Post-project BMPs

Post-construction BMPs include water quality treatment, minimizing the release of untreated urban runoff to downstream habitat, minimizing impervious footprint to the greatest extent feasible, conserving natural areas via offsite purchase of habitat credits, and minimizing Directly Connected Impervious Areas (DCIAs) to the greatest extent feasible. Post-construction peak flow reduction BMPs will reduce downstream erosion while allowing increased delivery of cleaned water to downstream ESA and wetland habitats.

A combination of post-construction BMPs facilities will be designed in accordance with published standards from the Riverside County Flood Control and Water Conservation District. The Project proponent will construct the facility according to local standards, requirements, and specifications, and will maintain the facility until turned over to the post-project maintenance group. Post-project maintenance responsibilities will be funded by monthly contributions of the lessors of the building space(s) via the collection of a common area fee spelled out in the lease agreement and conducted under contract to maintenance firms supervised by the Property Management Company retained by the property ownership.

Construction BMPs

During construction, all contractors and subcontractors will use Best Management Practices (BMPs) to manage, capture, control, eliminate, and prevent sediment, debris, and pollutants from being discharged into streambeds and drainages. A Storm Water Pollution Prevention Plan (SWPPP) will be prepared for the Project. Construction BMPs address sediment and erosion control, non-sediment pollutants, and non-storm water BMPs.

- BMPs will be implemented to maintain water quality. All runoff will be treated prior to exiting the site to reduce pollutants of concern. There will be no peak flow increase in water flow from the Project site.
- If grading occurs when the ephemeral streambed is wetted, a bypass will be required. A Bypass Plan will be developed by the SWPPP consultant prior to initiation of grading unless all grading can occur when the ephemeral streams are dry.
- During construction, all contractors and subcontractors will use standard BMPs to reduce

fugitive dust, subject to local water restrictions.

- Construction equipment storage, fueling, and staging areas shall be located within the Project footprint.
- The Project will reduce potential for spread of noxious and non-native species by not utilizing any prohibited species within the Project design. No plants included on the California Exotic Pest Plant Council's list of invasive species or in Table 6-2 of the MSHCP (see Section 3.3.3) will be used in any Project landscape anywhere on the site, and only native species will be planted adjacent to open space areas.
- During construction, all contractors and subcontractors will wash equipment prior to arriving onsite and limit staging of equipment to areas not occupied by noxious weeds.

Other applicable BMPs include:

- Trash and debris will be contained in covered containers and removed from the Project site in regular waste removal cycles.
- Construction employee parking and lunchtime eating activities will occur within the development footprint.
- Feeding of wildlife will not occur and food or food remains will be placed in sealed containers and transported from the Project in regular waste removal cycles.
- Construction personnel will not bring guns, dogs, loud music, or bright lights to the Project before, during, or after regular work hours.

3.3.5) Compensation

The Project's impacts to MSHCP riverine habitat will be mitigated through offsite compensation. Specifically, the Project proponent will purchase no less than 1.46 acres of credit at an approved mitigation bank within the Santa Ana River Watershed. Of the 1.46 acres, at least 0.73 acres will be establishment credits through the purchase of rehabilitation, reestablishment and/or establishment mitigation credits.

Any pools occupied by listed species of fairy shrimp would be mitigated through purchase of preservation credits at a 3:1 ratio (preserved habitat : occupied habitat) at the Barry Jones / Skunk Hollow mitigation bank or a mitigation bank that is determined to be acceptable to the City of Calimesa Planning Department, USFWS, and CDFW.

Offsite mitigation through purchase of credits at an approved mitigation bank provide a biologically equivalent or superior habitat compensation for both riverine and occupied fairy shrimp habitat. This is a suitable alternative because it compensates for impacted riparian/riverine areas and occupied (listed) fairy shrimp habitat through offsite preservation of habitat with greater functions and values.

Mitigation credits shall be purchased (and receipt provided to RCA) at least 30 days prior to the initiation of Project activities, which includes staging and site preparation, unless security is

provided via a Letter of Credit.

Implementation of the mitigation measures above are expected to reduce impacts to MSHCP riparian/riverine resources and listed fairy shrimp to a level that is less than significant and is consistent with Section 6.1.2 of the MSHCP.

4.0) NARROW ENDEMIC PLANT SPECIES MITIGATION (SECTION 6.1.3)

The MSHCP Information Map (RCA 2022) indicates that a habitat assessment is required for narrow endemic plant species Marvin's onion (*Allium marvinii*) and the many-stemmed Dudleya (*Dudleya multicaulis*). If suitable habitat is present, focused surveys are required.

MSHCP narrow endemic plant species Marvin's (Yucaipa) onion (*Allium marvinii*) and Many-stemmed Dudleya (*Dudleya multicaulis*) were not observed during focused surveys and these species are considered absent from the site. There would be no direct effects to these MSHCP narrow endemic plant species and no mitigation is proposed.

See the Biological Resources Assessment report provided in Appendix A.

5.0) ADDITIONAL SURVEY NEEDS (SECTION 6.3.2)

5.1) Criteria Area Species Survey Area - Plants

Based on review of the MSHCP Information Map (RCA 2022) for the parcel, the Project site is not within a mapped survey area for Criteria Area plant species and surveys for Criteria Area plant species are not required.

5.2) Burrowing Owl

Based on review of the MSHCP Information Map (RCA 2022) for the parcel, the Project site is within a mapped survey area for burrowing owl and a habitat assessment for burrowing owl is required. If potentially suitable habitat is present, focused burrowing owl surveys are required in accordance with the *MSHCP Burrowing Owl Survey Instructions* (RCA 2006).

5.2.1) Results/Impacts

No burrowing owls, owl sign (pellets, scat, feathers, tracks, etc.), or occupied burrows were observed onsite during the 2022 protocol breeding season survey and no mitigation is proposed. The MSHCP requires pre-construction presence/absence surveys for burrowing owl within the survey area where suitable habitat is present within 30 days prior to disturbance.

See the Biological Resources Assessment report provided in Appendix A.

5.3) Mammals

Based on review of the MSHCP Information Map (RCA 2022) for the parcel, the Project site is not within a mapped survey area for mammal species and surveys for mammal species are not required.

5.4) Amphibians

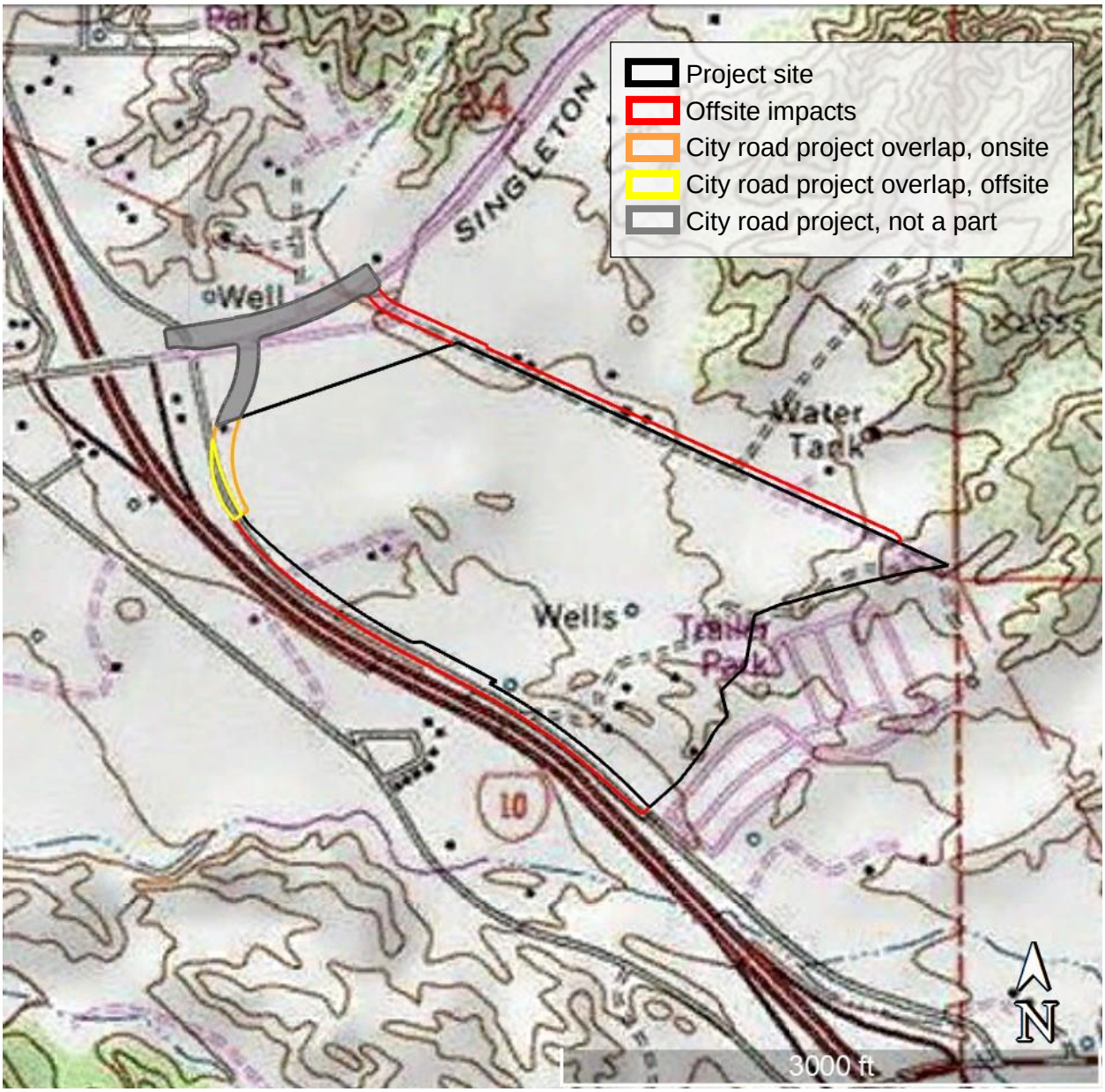
Based on review of the MSHCP Information Map (RCA 2022) for the parcel, the Project site is not within a mapped survey area for amphibian species and surveys for amphibian species are not required.

5.5) Delhi Sands Flower-Loving Fly

There are no Delhi soils mapped onsite and there is no habitat present for Delhi sands flower-loving fly. The proposed Project is not within an area with Delhi soils mapped within the MSHCP baseline data and no surveys for Delhi sands flower-loving fly are required.

Oak Valley North Commerce Center
City of Calimesa, Riverside County, California

Project Vicinity
Figure 1



Oak Valley North Commerce Center
City of Calimesa, Riverside County, California

Project Location

Figure 2

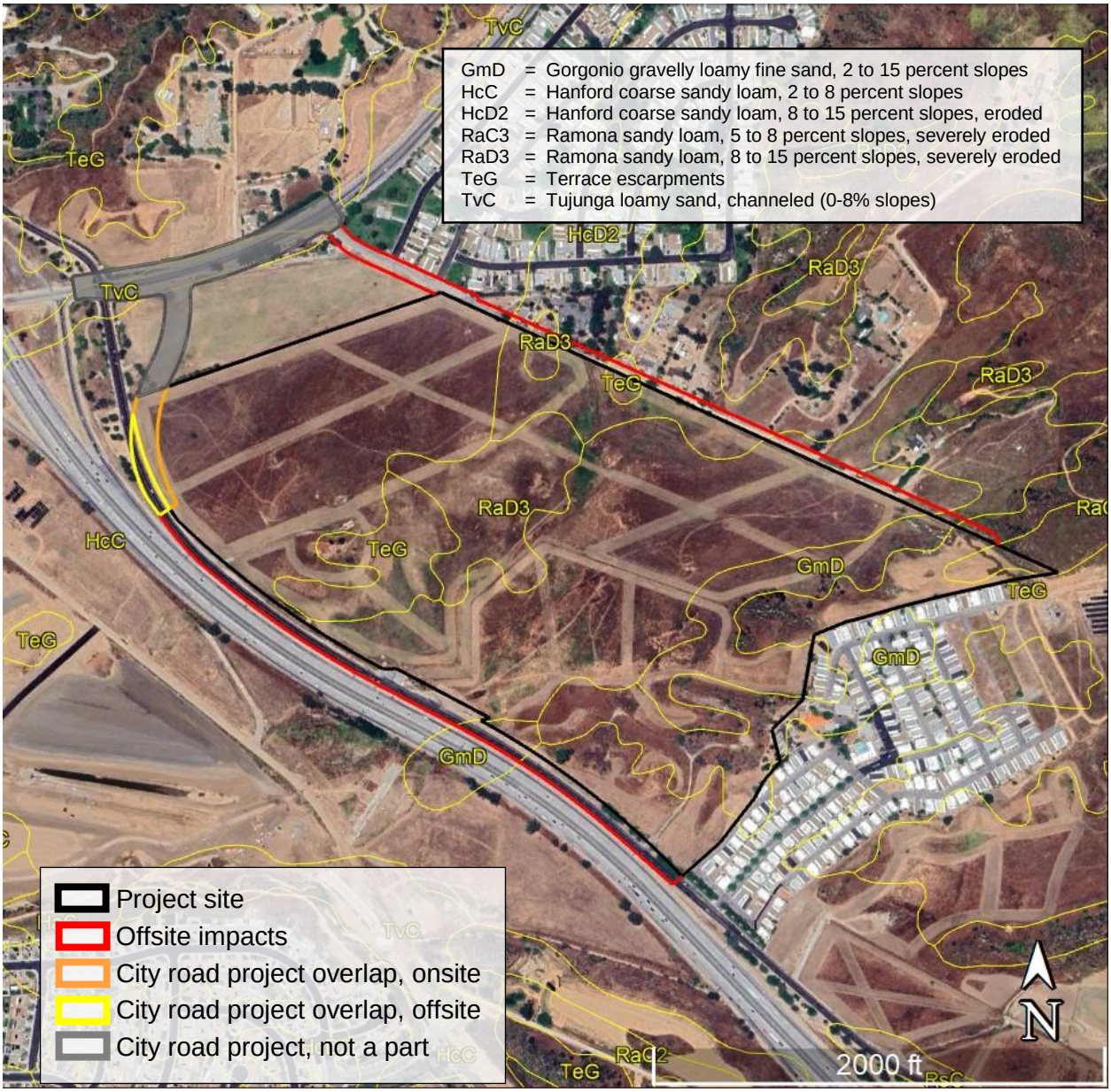
(USGS El Casco [2022] Quadrangle,
Township 2 South, Range 2 West, Sections 24 and 25)

Oak Valley North Commerce Center
City of Calimesa, Riverside County, California

Aerial Image

Figure 3

(Aerial obtained from Google Earth, May 2023)



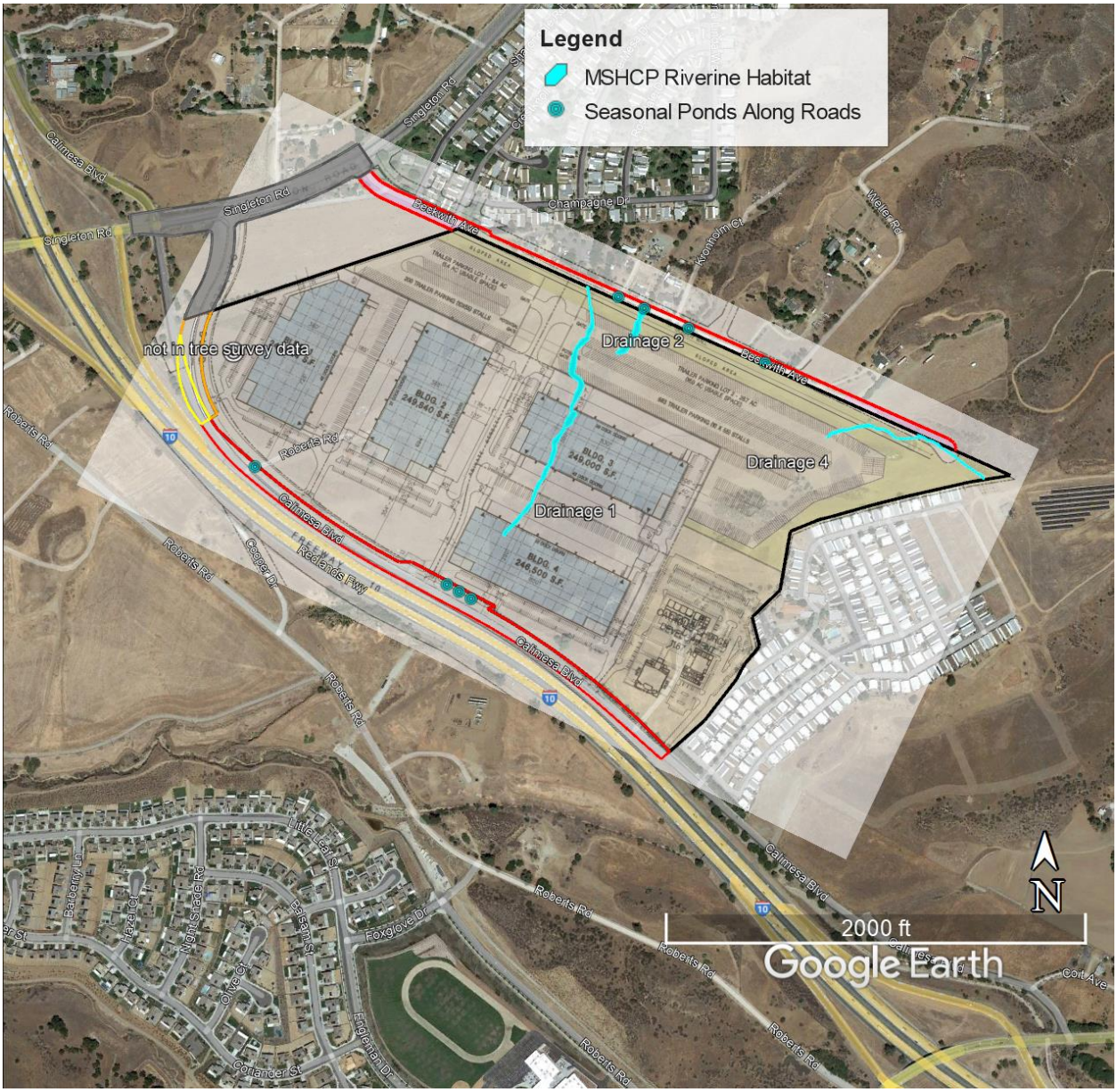
Oak Valley North Commerce Center
City of Calimesa, Riverside County, California

Soils Map
Figure 4

(Aerial obtained from Google Earth, May 2023; data from NRCS [2023])

Oak Valley North Commerce Center
City of Calimesa, Riverside County, California

MSHCP Riverine Resources
Figure 5



Oak Valley North Commerce Center
City of Calimesa, Riverside County, California

MSHCP Riverine Resources Impacts
Figure 6

Oak Valley North Commerce Center
City of Calimesa, Riverside County, California

Fairy Shrimp Survey Pools Locations

Figure 7

Oak Valley North Commerce Center
City of Calimesa, Riverside County, California

***Branchinecta Lindahli* Occupied Pools**

Figure 8

6.0) REFERENCES

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APPENDIX A: 2024 REVISED BIOLOGICAL RESOURCES ASSESSMENT REPORT

APPENDIX B: 2022 JURISDICTIONAL DELINEATION