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INDUSTRIAL PROPERTY GROUP, INC

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SUBJECT: Biological Resources Assessment for Proposed Rancho 38 Project Site Located on the Southwest Corner of the Intersection of Rancho Road and Emerald Road in the City of Adelanto, San Bernardino County, California

Introduction

This report contains the findings of ELMT Consulting’s (ELMT) biological resources assessment the Rancho 38 project located within Assessor Parcel Number 3128-291-02 (project, project site) in the City of Adelanto, San Bernardino County, California. The field investigation was conducted by biologists Jacob H. Lloyd Davies and Rachael A. Lyons on October 6, 2022, to document baseline conditions and assess the potential for special-status¹ plant and wildlife species to occur within the project site that could pose a constraint to implementation of the proposed project. Special attention was given to the suitability of the project site to support special-status plant and wildlife species identified by the California Department of Fish and Wildlife’s (CDFW) California Natural Diversity Database (CNDDDB), and other electronic databases as potentially occurring in the general vicinity of the project site.

Project Location

The project site is generally located east of United States Route 395, north of State Route 18, west of Interstate 15, and south of Air Expressway in the city of Adelanto, San Bernardino County, California. The site is depicted on the Adelanto quadrangle of the United States Geological Survey’s (USGS) 7.5-minute map series within Section 3 of Township 5 North, Range 5 West. Specifically, the project site is bounded to the north by Rancho Road, to the west by industrial development with undeveloped vacant land and Adelanto Road beyond, to the south by industrial development and undeveloped vacant land with Cassia Street beyond, and to the east by Emerald Road within Assessor’s Parcel Number 3128-291-02. Refer to Exhibits 1-3 in Attachment A.

Project Description

The project proposes to construct a warehouse facility with a four-driveway entrance off of existing Rancho Road, which is located along the northern boundary of the project site. Two passenger vehicle parking lots will be located on the north and south sides of the proposed warehouse and will consist of 394 parking stalls, while two trailer and commercial vehicle parking lots will be located on the west and east sides of the warehouse and will consist of 545 stalls. The majority of the project site will support a 623,140 s.f.

¹ As used in this report, “special-status” refers to plant and wildlife species that are federally and State listed, proposed, or candidates; plant species that have been designated with a California Native Plant Society Rare Plant Rank; wildlife species that are designated by the CDFW as fully protected, species of special concern, or watch list species; and specially protected natural vegetation communities as designated by the CDFW.

(square-foot) warehouse building. This includes 10,00 s.f. of office space and a potential second floor. The project also proposes approximately 379 s.f. of landscaping around the perimeter of the project site.

Methodology

A literature review and records search were conducted to determine which special-status biological resources have the potential to occur on or within the general vicinity of the project site. In addition to the literature review, a general habitat assessment or field investigation of the project site was conducted to document existing conditions and assess the potential for special-status biological resources to occur within the project site.

Literature Review

Prior to conducting the field investigation, a literature review and records search was conducted for special-status biological resources potentially occurring on or within the vicinity of the project site. Previously recorded occurrences of special-status plant and wildlife species and their proximity to the project site were determined through a query of the CDFW's QuickView Tool in the Biogeographic Information and Observation System (BIOS), CNDDDB Rarefind 5, the California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California, Calflora Database, compendia of special-status species published by CDFW, and the United States Fish and Wildlife Service (USFWS) species listings.

All available reports, survey results, and literature detailing the biological resources previously observed on or within the vicinity of the project site were reviewed to understand existing site conditions and note the extent of any disturbances that have occurred within the project site that would otherwise limit the distribution of special-status biological resources. Standard field guides and texts were reviewed for specific habitat requirements of special-status and non-special-status biological resources, as well as the following resources:

- Google Earth Pro historic aerial imagery (1985-2021);
- United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Soil Survey²;
- USFWS Critical Habitat designations for Threatened and Endangered Species; and
- USFWS Endangered Species Profiles.

The literature review provided a baseline from which to inventory the biological resources potentially occurring within the project site. The CNDDDB database was used, in conjunction with ArcGIS software, to locate the nearest recorded occurrences of special-status species and determine the distance from the project site.

Field Investigation

Following the literature review, biologists Jacob H. Lloyd Davies and Rachael A. Lyons inventoried and evaluated the condition of the habitat within a 200-foot buffer around the project site, where applicable, on

² A soil series is defined as a group of soils with similar profiles developed from similar parent materials under comparable climatic and vegetation conditions. These profiles include major horizons with similar thickness, arrangement, and other important characteristics, which may promote favorable conditions for certain biological resources.

October 6, 2022. Plant communities and land cover types identified on aerial photographs during the literature review were verified by walking meandering transects throughout the project site. In addition, aerial photography was reviewed prior to the site investigation to locate potential natural corridors and linkages that may support the movement of wildlife through the area. These areas identified on aerial photography were then walked during the field investigation.

Soil Series Assessment

On-site and adjoining soils were researched prior to the field investigation using the USDA NRCS Soil Survey for San Bernardino County, California. In addition, a review of the local geological conditions and historical aerial photographs was conducted to assess the ecological changes that the project site has undergone.

Plant Communities

Plant communities were mapped using 7.5-minute USGS topographic base maps and aerial photography. The plant communities were classified in accordance with Sawyer, Keeler-Wolf and Evens (2009), delineated on an aerial photograph, and then digitized into GIS Arcview. The Arcview application was used to compute the area of each plant community and/or land cover type in acres.

Plants

Common plant species observed during the field investigation were identified by visual characteristics and morphology in the field and recorded in a field notebook. Unusual and less-familiar plants were photographed in the field and identified in the laboratory using taxonomic guides. Taxonomic nomenclature used in this study follows the 2012 Jepson Manual (Hickman 2012). In this report, scientific names are provided immediately following common names of plant species (first reference only).

Wildlife

Wildlife species detected during the field investigation by sight, calls, tracks, scat, or other sign were recorded during surveys in a field notebook. Field guides used to assist with identification of wildlife species during the survey included The Sibley Field Guide to the Birds of Western North America (Sibley 2003), A Field Guide to Western Reptiles and Amphibians (Stebbins 2003), and A Field Guide to Mammals of North America (Reid 2006). Although common names of wildlife species are well standardized, scientific names are provided immediately following common names in this report (first reference only).

Jurisdictional Drainages and Wetlands

Aerial photography was reviewed prior to conducting a field investigation in order to locate and inspect any potential natural drainage features, ponded areas, or water bodies that may fall under the jurisdiction of the United States Army Corps of Engineers (Corps), Regional Water Quality Control Board (Regional Board), or CDFW. In general, surface drainage features indicated as blue-line streams on USGS maps that are observed or expected to exhibit evidence of flow are considered potential riparian/riverine habitat and are also subject to state and federal regulatory jurisdiction. In addition, ELMT reviewed jurisdictional waters information through examining historical aerial photographs to gain an understanding of the impact of land-use on natural drainage patterns in the area. The USFWS National Wetland Inventory (NWI) and Environmental Protection Agency (EPA) Water Program “My Waters” data layers were also reviewed to

determine whether any hydrologic features and wetland areas have been documented on or within the vicinity of the project site.

Existing Site Conditions

The proposed project site is located in an area that supports a variety of land uses in the City of Adelanto. The land surrounding the site is comprised of undeveloped, vacant land and commercial development. The site is bounded immediately to the north by Rancho Road with commercial development beyond, to the west by commercial development, the south by a mix of commercial development and undeveloped vacant land, and to the east by commercial development. The site itself consists entirely of undeveloped, vacant land which supports a native creosote scrub plant community. Much of the western portion of the site has been heavily disturbed and removed of vegetation by recent grading activities and the creation of artificial berms. Additionally, anthropogenic disturbances such as illegal dumping and off-road vehicular use, are heavily concentrated along the site boundaries.

Topography and Soils

On-site elevation ranges from approximately 2,959 to 2,938 feet above mean sea level and generally slopes from west to east, with no areas of topographic relief with the exception of slight elevational changes within the areas surrounding the artificial berms. Based on the NRCS USDA Web Soil Survey, the project site is historically entirely underlain by Bryman Loamy Fine Sand (2 to 5 percent slopes).

Vegetation

The project site consists of vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances, including off-road vehicular use and illegal dumping. These disturbances occur primarily along the project boundaries, with relatively little disturbance occurring near the center of the project site. Additionally, most of the vegetation has been removed from the western portion of the site, and this area has been recently graded. Refer to Attachment B, *Site Photographs*, for representative site photographs.

The site supports one plant community, creosote scrub, and one land cover type, disturbed (refer to Exhibit 4, *Vegetation* in Attachment A). On-site vegetation density varies from unvegetated to moderately vegetated. Common plant species observed on-site include creosote (*Larrea tridentata*), rubber rabbitbrush (*Ericameria nauseosa*), Mediterranean mustard (*Hirschfeldia incana*), Russian thistle (*Salsola tragus*), salt cedar (*Tamarix ramosissima*), mulefat (*Baccharis salicifolia*), horseweed (*Erigeron canadensis*), pampas grass (*Cortaderia selloana*), teddy-bear cholla (*Cylindropuntia bigelovii*), lemonscent (*Pectis angustifolia*), prostrate sandmat (*Euphorbia protstrata*), desert marigold (*Baileya multiradiata*), and spineflower (*Chorizanthe* sp.).

Wildlife

Plant communities provide foraging habitat, nesting/denning sites, and shelter from adverse weather or predation. This section provides a discussion of those wildlife species that were observed or are expected to occur within the project site. The discussion is to be used a general reference and is limited by the season, time of day, and weather conditions in which the field investigation was conducted. Wildlife detections were based on calls, songs, scat, tracks, burrows, and direct observation. The project site provides moderate habitat for wildlife species, especially those adapted to a high degree of anthropogenic disturbance.

Fish

No fish or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for fish were observed on or within the vicinity of the project site. Therefore, no fish are expected to occur and are presumed absent from the project site.

Amphibians

No amphibians or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for amphibian species were observed on or within the vicinity of the project site. Therefore, no amphibians are expected to occur on the project site and are presumed absent.

Reptiles

The survey area provides limited foraging and cover habitat for local reptile species adapted to conditions within the Mojave Desert. The only reptilian species observed was western side-blotched lizard (*Uta stansburiana elegans*). Common reptilian species that could be expected to occur include Great Basin fence lizard (*Sceloporus occidentalis longipes*), Great basin gopher snake (*Pituophis catenifer deserticola*), and red racer (*Coluber flagellum piceus*).

Birds

The project site and surrounding area provide suitable foraging and nesting habitat for bird species adapted to conditions within the Mojave Desert. Bird species detected during the field investigation include cactus wren (*Campylorhynchus brunneicapillus*), American kestrel (*Falco sparverius*), house finch (*Haemorhous mexicanus*), common raven (*Corvus corax*), loggerhead shrike (*Lanius ludovicianus*), and mourning dove (*Zenaidura macroura*). Owl pellets were also observed on the project site, but the contributing species is unknown.

Mammals

The survey area provides moderate foraging and cover habitat for mammalian species adapted to conditions surrounding the Mojave Desert. Mammalian species detected during the field investigation include coyote (*Canis latrans*), California ground squirrel (*Otospermophilus beecheyi*), and white-tailed antelope squirrel (*Ammospermophilus leucurus*). Additional common mammalian species that could be expected to occur include desert cottontail (*Sylvilagus audubonii*).

Nesting Birds

No active nests or birds displaying nesting behavior were observed during the field survey, which was conducted outside the breeding season. The project site provides minimal nesting opportunities for year-round and seasonal avian residents, as well as migrating songbirds that are adapted to conditions surrounding the Mojave Desert.

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction.

Migratory Corridors and Linkages

Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both anthropogenic disturbance and natural fluctuations in resources.

According to the San Bernardino County General Plan, the project site has not been identified as occurring within a Wildlife Corridor or Linkage. As designated by the San Bernardino County General Plan Open Space Element, major open space areas documented in the vicinity of the project site include the Mojave River located approximately 4.6 miles east of the site. The site is separated from this identified regional wildlife corridors and linkages by existing development and roadways, and undeveloped land, and there are no riparian corridors or creeks connecting the project site to these areas.

The undeveloped land in the immediate vicinity of the project site provides local wildlife movement opportunities for wildlife species moving through the immediate area; however, the project site does not function as a major wildlife movement corridor or linkage. As such, implementation of the proposed project is not expected to have a significant impact to wildlife movement opportunities or prevent local wildlife movement through the area since there is ample habitat adjacent to the project site to support wildlife movement opportunities.

Jurisdictional Areas

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates discharge of dredge or fill materials into “waters of the United States” pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Regional Board regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

The project site does not support any discernible drainage courses, inundated areas, wetland features, or hydric soils that would be considered jurisdictional by the Corps, Regional Board, or CDFW. A query of the NWI database determined that no potential blue-line streams, riverine, or other aquatic resources occur within or adjacent to the project site. Therefore, project activities will not result in impacts to Corps, Regional Board, or CDFW jurisdictional areas and regulatory approvals will not be required.

Special-Status Biological Resources

The CNDDDB Rarefind 5 and the CNPS Electronic Inventory of Rare and Endangered Vascular Plants of California were queried for reported locations of special-status plant and wildlife species as well as special-status natural plant communities in the Adelanto USGS 7.5-minute quadrangle. Due to the proximity of the proposed project site to the quadrangle boundaries, the Victorville USGS 7.5-minute quadrangle was also queried. The habitat assessment evaluated the conditions of the habitat(s) within the boundaries of the project site to determine if the existing plant communities, at the time of the survey, have the potential to

provide suitable habitat(s) for special-status plant and wildlife species.

The literature search identified twelve (12) special-status plant species and forty-five (45) special-status wildlife species as having potential to occur within the Adelanto and Victorville USGS 7.5-minute quadrangles. No special-status plant communities were identified as having potential to occur within these quadrangles. Special-status plant and wildlife species were evaluated for their potential to occur within the project site based on habitat requirements, availability, and quality of suitable habitat, and known distributions. Species determined to have the potential to occur within the general vicinity of the project site is presented in Attachment D: *Potentially Occurring Special-Status Biological Resources*.

Special-Status Plants

According to the CNDDDB and CNPS, twelve (12) special-status plant species have been recorded in the Adelanto and Victorville quadrangles (refer to Attachment D). No special-status plant species were observed within the proposed project footprint during the field investigation. The majority of the project site consists of vacant, undeveloped land which supports a native creosote scrub community. According to the CNDDDB and CNPS, twelve (12) special-status plant species have been recorded in the Adelanto and Victorville quadrangles (refer to Attachment D). No special-status plant species were observed on-site during the field investigation. The project site consists vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances and is primarily surrounded by existing development. These disturbances have reduced the ability of the on-site habitat to provide suitable habitat for special-status plant species known to occur in the general vicinity. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, it was determined that the project site does not provide suitable habitat for any of the special-status plant species known to occur in the area and all are presumed to be absent. No focused surveys are recommended.

Special-Status Wildlife

According to the CNDDDB, forty-five (45) special-status wildlife species have been reported in the Adelanto and Victorville quadrangles (refer to Attachment D). No special-status wildlife species were observed during the field investigation. The project site supports a creosote scrub community, which is capable of providing potential foraging and nesting/denning opportunities for wildlife species, especially those adapted to a high degree of anthropogenic disturbance. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the proposed project site has a moderate potential to provide suitable habitat for California horned lark (*Eremophila alpestris actia*), loggerhead shrike (*Lanius ludovicianus*), and a low potential to support prairie falcon (*Falco mexicanus*).

None of the aforementioned special-status wildlife species are state or federally listed as threatened or endangered. In order to ensure impacts to these avian species do not occur from implementation of the proposed project, a pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance. With implementation of the pre-construction nesting bird clearance survey, impacts to special-status avian species will be less than significant and no mitigation will be required.

Critical Habitats

Under the federal Endangered Species Act, "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival

and eventual recovery of that species. Maintenance of these physical and biological features requires special management considerations or protection, regardless of whether individuals or the species are present or not. All federal agencies are required to consult with the USFWS regarding activities they authorize, fund, or permit which may affect a federally listed species or its designated Critical Habitat. The purpose of the consultation is to ensure that projects will not jeopardize the continued existence of the listed species or adversely modify or destroy its designated Critical Habitat. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing is on federal lands, uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highways Administration or a Clean Water Act Permit from the United States Army Corps of Engineers). If there is a federal nexus, then the federal agency that is responsible for providing the funding or permit would consult with the USFWS.

The project site is not located within federally designated Critical Habitat. The nearest Critical Habitat designation is located approximately 2.6 miles to the northeast for southwestern willow flycatcher (*Empidonax traillii extimus*). Therefore, no impacts to federally designated Critical Habitat will occur from implementation of the proposed project.

Conclusion

Based literature review and field survey, and existing site conditions discussed in this report, implementation of the project will have no significant impacts on federally or State listed species known to occur in the general vicinity of the project site. Additionally, the project will have no effect on designated Critical Habitat, or regional wildlife corridors/linkage because none exists within the area. No jurisdictional drainage and/or wetland features were observed on the project site during the field investigation. No further surveys are recommended. With completion of the recommendations provided below, no impacts to year-round, seasonal, or special-status avian residents or special-status species will occur from implementation of the proposed project.

Recommendations

Migratory Bird Treaty Act and Fish and Game Code

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season.

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will

be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Please do not hesitate to contact Tom McGill at (951) 285-6014 or tmcgill@elmtconsulting.com or Travis McGill at (909) 816-1646 or travismcgill@elmtconsulting.com should you have any questions this report.

Sincerely,



Thomas J. McGill, Ph.D.
Managing Director



Travis J. McGill
Director

Attachments:

- A. *Project Exhibits*
- B. *Site Plan*
- C. *Site Photographs*
- D. *Potentially Occurring Special-Status Biological Resources*
- E. *Regulations*