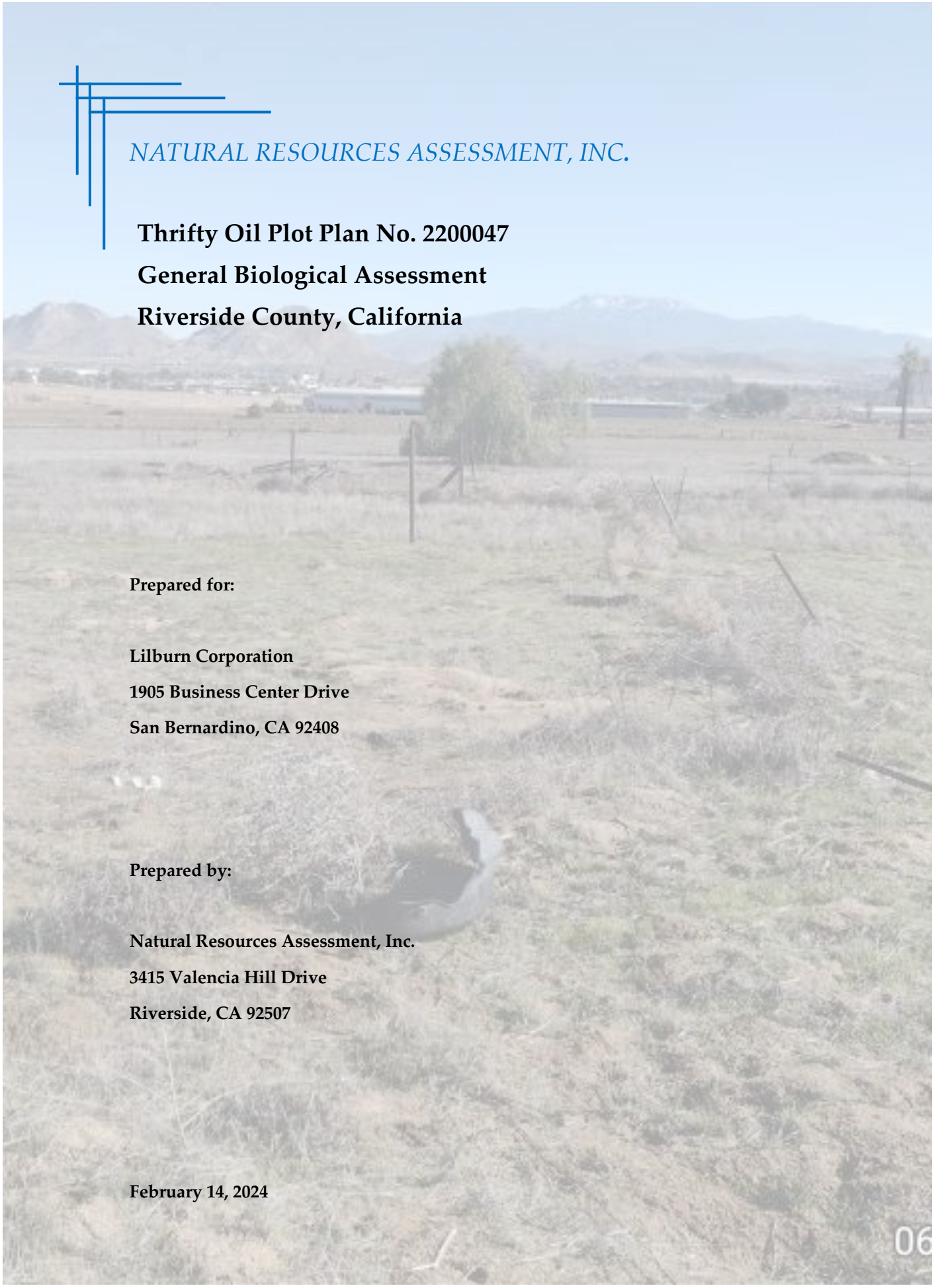

NATURAL RESOURCES ASSESSMENT, INC.

Thrifty Oil Plot Plan No. 2200047
General Biological Assessment
Riverside County, California

Prepared for:

Lilburn Corporation

1905 Business Center Drive

San Bernardino, CA 92408

Prepared by:

Natural Resources Assessment, Inc.

3415 Valencia Hill Drive

Riverside, CA 92507

February 14, 2024

Project Number: LIL21-105

3415 Valencia Hill Drive, Riverside, California 92507 Telephone 951 686 4483 Fax 951 686 8418
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CERTIFICATION

I hereby certify that the statements furnished below and in the attached exhibits present 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.

Karen Kirtland
NATURAL RESOURCES ASSESSMENT, INC.
February 14, 2024

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1.0 Introduction

Lilburn Corporation contracted with Natural Resources Assessment, Inc. (NRAI) on behalf of Thrifty Oil Company to prepare a general biological assessment for Thrifty Oil Plot Plan No. 2200047 project in unincorporated Riverside County, California. The biological assessment was required for the development application.

2.0 Site Location and Property Description

The project encompasses two entire parcels (APN's 317-260-016, 317-260-015) and a portion of APN 317-260-017). Impacts to APN's 317-260-016 and 317-260-015 total 8.87 acres. Offsite impacts to APN 317-260-017 equal 0.17 acres. Road improvement will amount to a total of 4.16 acres. Overall impacts associated with this project will be 13.2 acres. All impacts are permanent impacts.

The project is located on the northeast corner of Water Street and Tobacco Road approximately 7 miles west of the City of Perris in unincorporated Riverside County, California (Figures 1 and 2).

The project site is on the Perris 7.5' U. S. Geological Survey (USGS) topographic quadrangle, San Bernardino base and meridian (Figure 2).

Thrifty Oil Co (Applicant) proposes to construct one 192,249 square foot (SF) concrete tilt-up, non-refrigerated warehouse on an 8.87-acres of vacant land designated as APN 317-260-016 and 317-260-015 (Proposed Project), Figure 1.

2.1 On-Site Improvements

Site Plan Overview. The Project is to construct one 192,249 SF non-refrigerated warehouse with 10 bays, one grade level door and 25 truck docks on 8.87. (net) acres, The warehouse is designed to house one tenant, which has not been identified at this time, and includes two 4,000 SF offices (total 8,000 SF total office space)). The lot coverage would be 47.3 percent where a maximum of 50 percent is allowed, and the floor area ratio (FAR) would be 0.48.

The Project Site abuts APN 317-260-17 on the north which has R-R-1 zoning and APN 317-260-034 on the east, which is zoned M-SC. The Project Applicant owns APN 317-260-17. The Project is designed with a building setback of 41 feet on the northern property boundary and an approximate 138 feet on the east, where a minimum of 50 feet is allowed where an industrial property abuts a residential or commercially zoned property. A 6-foot-minimum and approximately 13-foot maximum varying landscape area is planned along the northerly property line and approximately 25-30 feet is provided along the easterly property line, where a minimum of 20 feet is required unless a tree screen is proposed. Therefore, to be compliant with the design standards for the northern property boundary the Applicant requires a variance. It is not feasible to move the building due to lot size and topography, and it is not financially feasible for the Applicant to reduce the building size while funding the County's master plan of drainage improvements being required as part of Project approvals.

The building height would be approximately 36-foot clear, with an exterior height not to exceed 46 feet which is consistent with Federal Aviation Administration/March Air Reserve Base limitations and is consistent with the building elevations of the industrial uses within the immediate Project vicinity (The Project was reviewed and approved by the ALUC on January 12, 2023 under File No. ZAP1550MA22).

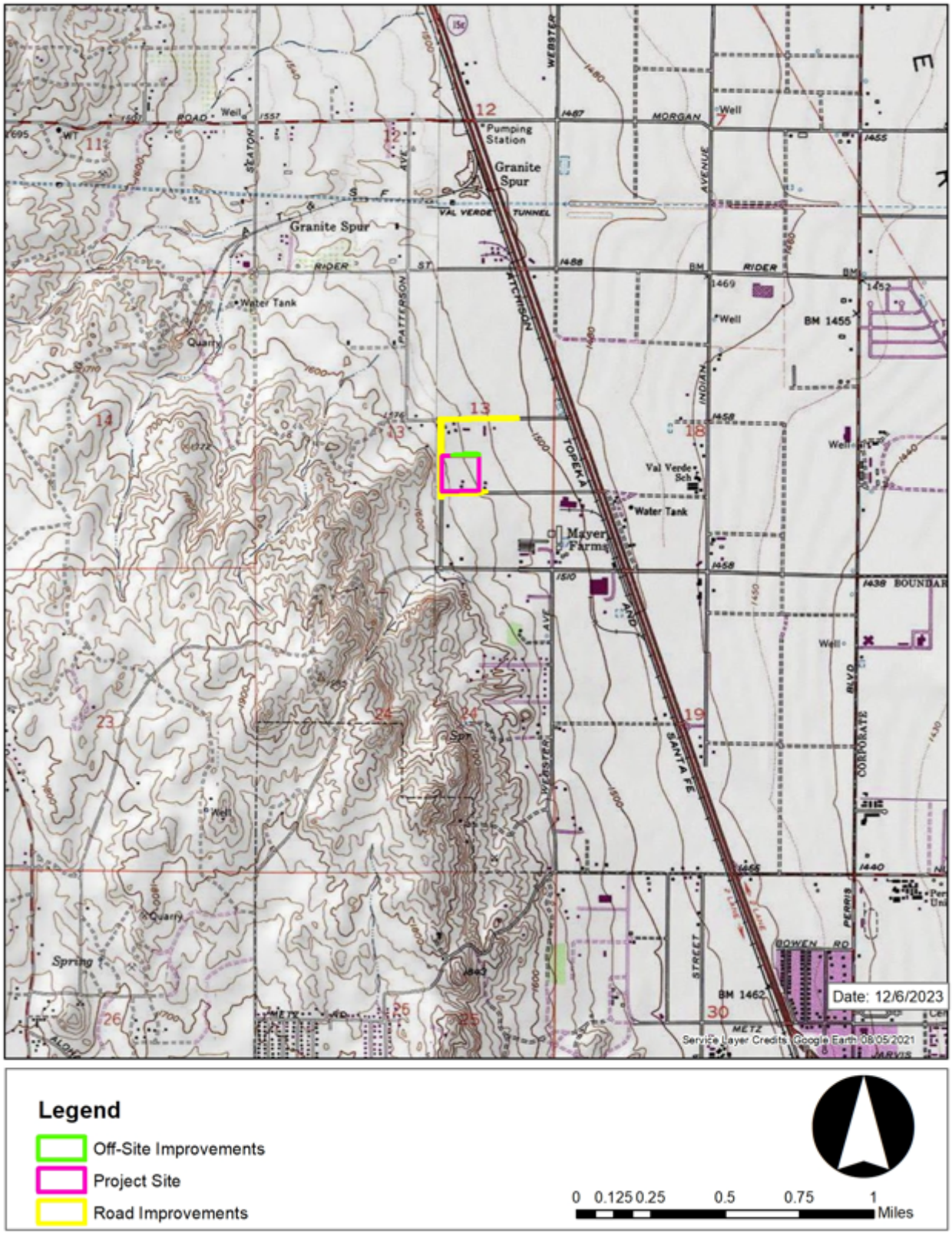

Figure 1. Site and Regional Location of the Project Site.

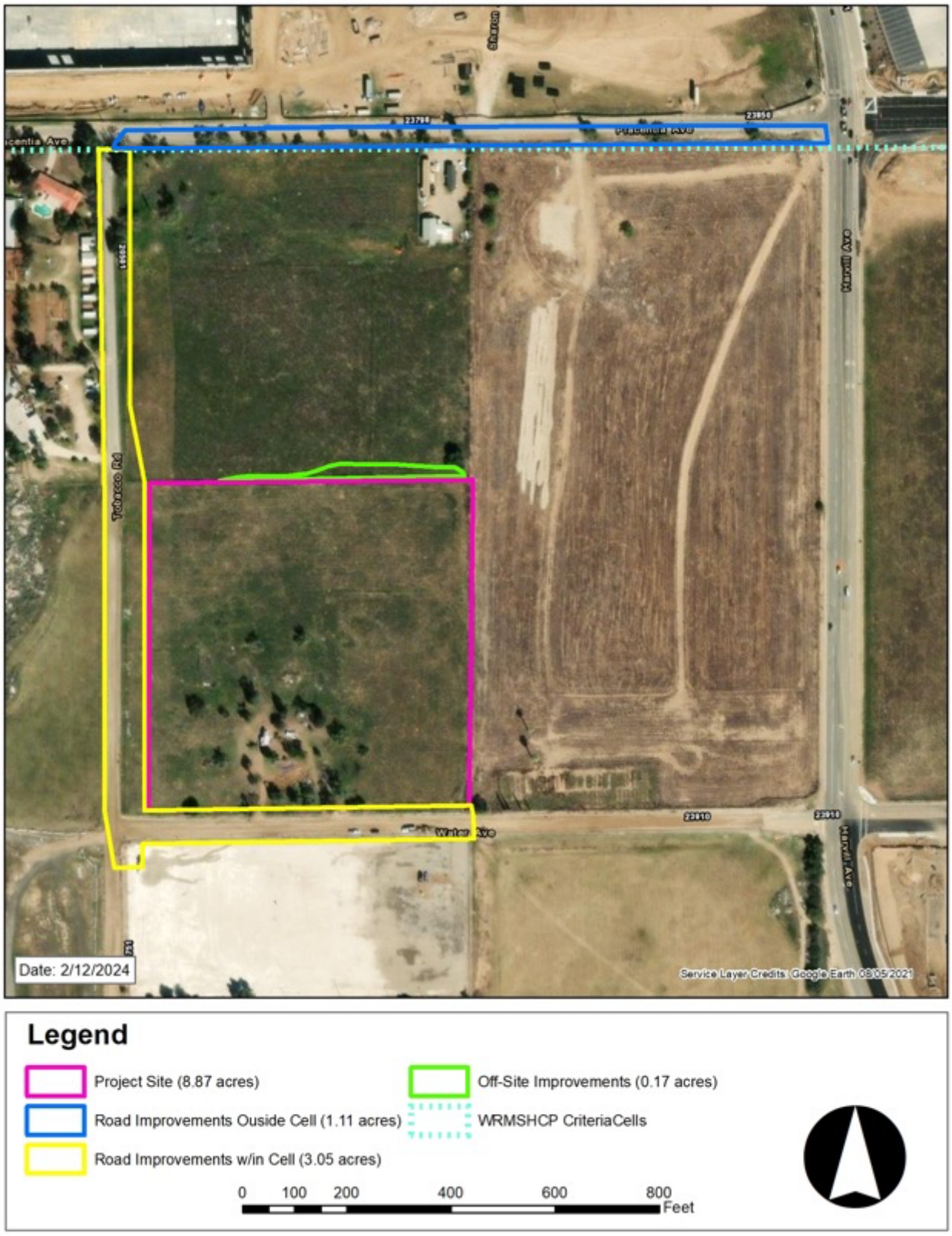

Figure 2. Project Aerial and Surrounding Off-site Areas.

The color scheme of the warehouse is a variety of neutral earth tones with accents which are consistent with a color scheme to blend with the surrounding area.

Parking. The site contains a total of 125 auto-parking spaces, which include five spaces that are American with Disabilities Act (ADA)-compliant stalls. Pursuant to Section 5.106.5.3.1 of the CalGreen Code, a total of 25 electric vehicle (EV) spaces will be provided. Of the 25 EV spaces, 7 will be auto parking spaces with electric vehicle supply equipment (EVSE) installed. Of the 7 auto parking spaces with EVSE, one will be designated as standard accessible EVCS and one will be designated as van accessible EVCS. Pursuant to Section 5.106.4.1.2 of the CalGreen Code, 7 long-term bicycle parking spaces will be provided.

Landscaping and Hardscape. Landscaping is designed around the perimeter as well as within various parking areas. The facility will provide approximately 58,062 SF of landscaped area (approximately 15 percent of the net lot area), which exceeds the 15 percent (or 57,979 SF) minimum required by the County London Plane and California sycamore primarily are planned for the Water Street frontage, while catalpa and blue palo verde are planned for the Tobacco Road frontage. Brisbane box trees are planned for the northern property boundary. Drought tolerant ground cover is identified around the building perimeter and along the property boundary perimeter.

Site Lighting: Site lighting will be low-level high-pressure sodium that will be pointed downward at the parking lot and/or along the edges of the building

Stormwater Management: The Project Applicant has prepared a Water Quality Management Plan (WQMP) that identifies stormwater management for the building operations/post construction. Overall, the existing drainage patterns were identified, and the design preserves the overall drainage pattern. As part of the Project, the on-site storm drain system will be constructed to collect and convey the storm water runoff in a northeasterly direction to proposed permanent structural best management practices (BMPs) for treatment purpose. The site BMP's will consist of pre-treatment filtering systems prior to stormwater infiltration by underground storm chambers. The site will attenuate the Q-100 6 hr. design storm and the flows will be infiltrated. The chambers are sized to attenuate the developed flows to below Q-100 predevelopment flow rates and water will discharge through four 12-inch diameter storm drainpipes to an overflow "U" shaped concrete channel and weirs to the adjacent County of Riverside easterly parcel. There will also be a 3-foot-wide stabilization blanket consisting of grouted rip-rap continuous to the property line discharge via sheet flow. The design attenuates the Q-100 from 15 cubic feet per second (cfs) to 7.7 cfs. Construction of the Project will also require the contractor to prepare a Stormwater Pollution Prevention Plan (SWPPP) as the site is more than 1 acre.

Utilities and Services: Public water and sewer are provided by Eastern Municipal Water District (EMWD), electrical service is available from Southern California Edison (SCE), and natural gas is available from Sempra Energy. The Applicant has received a "will serve letter" from EMWD.

2.2 Off-Site Improvements

- Installation of approximately 1,250 linear feet of sewer main to connect with the existing main currently located east of the Project Site, at the intersection of Water Street and Harvill Avenue. A new 8-inch line will be installed in the Water Street right of way from the existing EMWD sewer manhole located at Harvill Avenue intersection (westerly side of the street).
- The water connections are planned to tie into existing water mains fronting the site in Tobacco Road and Water Street.
- Road improvements are proposed to widen and pave Water Street along the Project frontage, from Tobacco Road to approximately 660 feet easterly of the intersection of Water Street and Tobacco

Road. Improvements include paving, installation of curb, gutter and sidewalk (28-foot half street improvements) plus 18-feet width.

- Road improvements are proposed to widen Tobacco Road from the intersection of Water Street approximately 650 linear feet north from the intersection of Tobacco Road and Water Street to Placentia Avenue. Improvements include 32 feet of pavement along the Project frontage with Tobacco Road and 16 feet of one-half street pavement and graded shoulder from the northern property boundary to the intersection of Tobacco Road and Placentia Avenue. In addition, minor curb return and pavement transitions to the existing asphalt pavement will be installed at the intersection of Tobacco Road and Placentia Avenue. An asphalt-concrete berm will be constructed to convey drainage to the Placentia Avenue intersection storm drain system (Lateral H 10.1).

- Construction of 630 feet of 36-inch Master Planned Storm Drain Line H-10 along the project frontage in Water Street from the intersection of Tobacco Road easterly to the tie-in per County of Riverside Storm Drain Improvement plan IP220057. The adjacent developer (BCIF Harvill Business Center LP) per PPT220002 will construct the Master Plan Storm Drain Line H-10, 672-ft of 36-inch RCP in Water St. from the intersection of Harvill Ave. and Water St. to our project's easterly boundary. The Orden Company (Thrifty Oil Company), has also coordinated with BCIF Harvill Business Center LP for construction of the downstream storm drain Line H 10 (1,337.5 +/- feet of 54-inch and 48-inch RCP in Harvill Ave.) from the intersection of Water St. and Harvill Ave. to the intersection of Harvill Ave. and Placentia Ave. per Perris Valley MDP Line H-10 County Flood Control Plans prepared per IP 220057.

- Northern Graded Slope, Offsite. The graded slope on the northern boundary extends offsite of the property boundary into APN 317-260-017. The graded slope is necessary to accommodate grading of the site.

Offsite impacts to APN 317-260-017 equal 0.17 acres. Road improvement will amount to a total of 4.16 acres.

2.3 Construction

Construction is anticipated to occur in one phase, beginning in winter 2023, lasting approximately 12 months. Initial site improvements include grading and underground infrastructure followed by building construction, paving, and landscape activities. The grading quantities are anticipated to balance on site and little to no import or export of fill material is anticipated. Project construction will require the use of heavy equipment such as dozers, scrapers, paving machines, concrete trucks, and water trucks.

Construction activities include the following:

- Site grading and underground utility construction – expected to last approximately two months. Site activities include placement of underground water, sewer and other utilities throughout the site to service the building. Typical equipment includes excavators and trenchers.

- Construction of 1,250 feet of multipurpose trail per the modified County of Riverside Standard Plan No. 405 (18 feet in width), consisting of 10-foot-wide densified granite trail with a split rail equestrian fence separating an 8-foot parkway section. The parkway section consists of two feet of landscaping and a 6-foot-wide public sidewalk. The multipurpose trail will be constructed within the public right-of-way on the southerly side of Placentia Avenue, from the southeasterly intersection of Placentia Avenue Tobacco Road to the intersection of Placentia Avenue with Harvill Avenue. The proposed section is identified in the plot plans.

- Building Construction and Architectural Coating – construction of the one 194,479 SF non-refrigerated warehouse (including 8,000 SF of office space) is expected to occur over eight to nine months. The construction method is concrete tilt-up – concrete is formed on the ground, lifted into place and braced. Typical equipment includes welders, concrete trucks, and cranes for lifting. Should a crane be utilized, the Project contractor will comply with all local, State, and federal regulations, including but not limited to the FAA Section 77.13 for construction/alteration near airports. The type of equipment will be evaluated and all permits obtained as necessary prior to construction. All portions of the building will be completed including installation of rollup doors and painting.
- Final Site Paving and Landscaping – anticipated to occur over one month. All parking areas will be paved, and landscaping placed per the design. All architectural and parking lot lighting will also be installed.

2.4 Fuel Modification Zones

There are no fuel modification zones proposed for this project as of the date of this report.

2.5 Off-Site Staging and Storage Areas

The project does not require any staging or storage areas outside of the project limits as described above.

2.6 Temporary Impacts

All impacts are permanent.

3.0 Methods

3.1 Data Review

NRAI conducted a data search for information on plant and wildlife species known occurrences within the vicinity of the project. This review included biological texts on general and specific biological resources, and those resources considered to be sensitive by various wildlife agencies, local governmental agencies and interest groups. Information sources included but are not limited to the following:

- Data from Calflora, California Native Plant Society (CNPS) Inventory; the California Consortium of Herbaria; the Information, Planning, and Conservation System (IPaC); the Biogeographic Information & Observation System (BIOS); and the California Natural Diversity Data Base (CNDDB).
- U.S. Fish and Wildlife Service (USFWS), U.S. Army Corps of Engineers (Corps), Santa Ana Regional Water Quality Control Board (RWQCB), and California Department of Fish.
- Information documents regarding potential resources on the project.

NRAI used the information in our field survey approach. Please see Section 9.0 for a complete listing of documents reviewed.

3.2 Field Survey

Ms. Kirtland and Mr. Ricardo Montijo, subcontractor to NRAI, conducted the field survey of the onsite portion of the property on January 6, 2022 (Figure 2). Field data locations were mapped using a Global Positioning System (GPS) device. The field team surveyed the property from east to west and north to south. There was a small area along the southern border where a home trailer was camped, with occupants

in residence. Due to safety concerns, the field crew surveyed this small occupied area using binoculars only. The field team took notes of soil conditions, plant cover, plant species mix and species.

The field survey included observations of potential habitat for sensitive species. Sign surveyed for included nests, tracks, scat, burrows, skeletal remains, and visual sightings. Binoculars were used to aid in the identification of wildlife, as well as habitats in all inaccessible areas. All species identified by sight, call or sign (burrows, scat, tracks, etc.) were recorded.

Access to the entire site required a combination of walking and driving the dirt roads on the south and west boundaries of the property, including visual surveys of the adjacent properties for sensitive resources (Photos 1 and 2).

The sewer-line installation, water connection, and storm drain construction are all located within the existing dirt and paved roads. The required graded slope outside the northern boundary of the existing APN line extends offsite of the property boundary.

We surveyed the eastern half of this area both on foot and visually as part of the general biological assessment. We surveyed the entire area visually with binoculars as part of the burrowing owl breeding season surveys (Photo 3).

Ms. Kirtland conducted a second survey of the off-site impact areas on June 6, 2023. She surveyed the road improvement alignments, sewer, storm and waterline underground routes and the proposal trail alignment (Figure 2, Photos 4 - 15 in Appendix A).

4.0 Results

4.1 Weather Conditions, Topography and Soils

Weather at the beginning of the survey was 60° Fahrenheit, with no wind and clear skies. By the end of the survey, the temperature was 73° Fahrenheit, with no winds and a thin cover of stratus clouds.

The site topography is mostly flat, with some dirt mounds from prior disking (Figure 2, Photos 16 and 17).

Greenfield sandy loam, 2 to 8 percent slopes, eroded (GyC2) is the only soil type within the project limits (Figure 3, Natural Resources Conservation Service 2022[1]). This soil occurs on alluvial fans and terraces. Greenfield sandy loam is formed of an alluvium derived from granite and is a well-drained, non-hydric soil that never ponds or floods. It ranges from non-saline to very slightly saline. The soil on site has been mixed and mass-compacted by disking activities.

The proposal offsite improvements lie almost entirely within existing dirt and paved roads. The topography in these areas is flat and the soils are mass-compacted. Due to the scale, it is not possible to display the soils graphically for the various off-site areas. The project soil is Greenfield sandy loam, 2 to 8 percent slopes, eroded (GyC2). The offsite areas have the following soils.

Gorgonio loamy sand, deep found on 2 to 8 percent slopes (GiC). This soil occurs on alluvial fans It is formed of an alluvium derived from granite. Gorgonio loamy sand is a somewhat excessively drained, non-hydric soil that never ponds or floods. It occurs as a small portion of the soil along northern section of Harvill Avenue.

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[1] https://websoilsurvey.nrcs.usda.gov/app/

Photo 1. Water Street. Southern border of the property looking south.

Photo 2. Western boundary of the property looking southeast.

Photo 3. Property to the west of the western project boundary.

Cieneba rocky sandy loam, 15 to 50 percent slopes, eroded (CkF2). This soil occurs on hills. It is formed from residuum weathered from igneous rock. Cieneba rocky sandy loam is a somewhat excessively drained, non-hydric soil that never ponds or floods. It is found in a very small center section of Tobacco Road in the offsite alignment.

Hanford coarse sandy loam, 2 to 8 percent slopes (HcC). This soil occurs on alluvial fans It is formed of an alluvium derived from granite. Hanford coarse sandy loam is a well-drained, non-hydric soil that never ponds or floods. It is nonsaline to very slightly saline (0.0 to 2.0 m. Hanford coarse sandy loam forms most of the alignment along Tobacco Road between the small area of Cieneba rocky sandy loam north to the area of Monserate sandy loam.

Monserate sandy loam, 5 to 8 percent slopes, eroded (MmC2). This soil occurs on alluvial fans It is formed of an alluvium derived from granite. Monserate sandy loam is a well-drained, non-hydric soil that never ponds or floods. Monserate sandy loams occupies a small area of the junction of Tobacco Road and Harvill Avenue.

4.2 Land Uses

A review of aerial imagery from Google Earth shows there was a single residence in the southern portion of the site from at least 1994 to 2006, after which the land became vacant. Other than the residence, the property appears to have been vacant land from at least 1984. According to the Regional Conservation Authority (RCA) Multiple Species Habitat Conservation Plan (MSHCP) Information Map, the site was designated as agricultural in 1994, but changed to developed in 2005 and 2012.

The various proposed off-site alignments are along existing dirt and paved roads

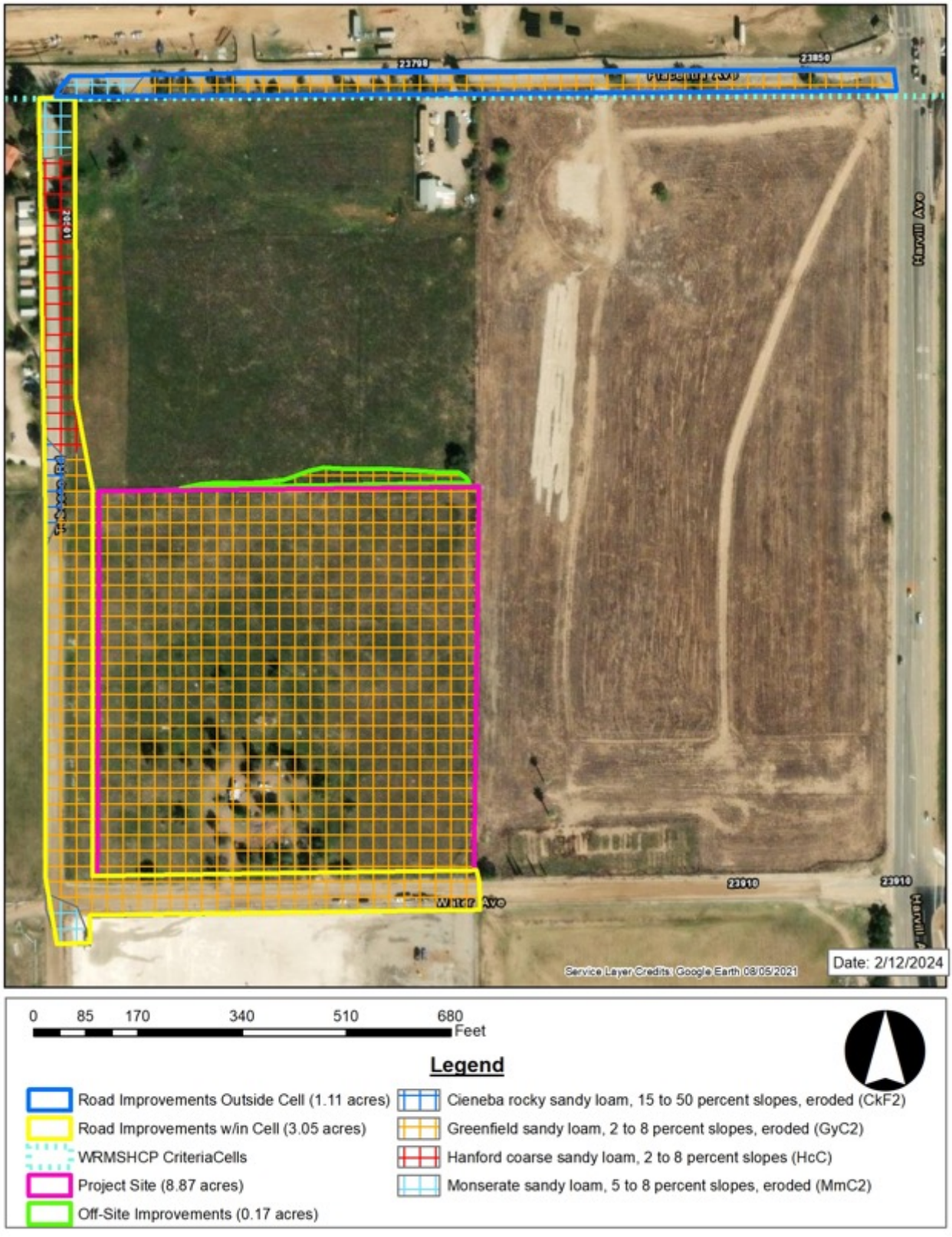

Figure 3. Soil Type.

Photo 4. Topography of the property. Looking east from the western border.

Photo 5. View of the property looking east from the western boundary.

4.3 Vegetation Cover

At the time of the survey, the property was dominated by a ruderal (weedy) grassland plant community (Figure 4, Photos 1 and 2). Species observed include non-native weed species such as Russian thistle (*Salsola tragus*), mare's tails (*Erigeron canadensis*) and white tumbleweed (*Amaranthus albus*). Weedy grasses include slender wild oats (*Avena barbata*), red brome (*Bromus madritensis* ssp. *ruben*) and old han schismus (*Schismus barbatus*). Native species seen that are typical of ruderal grasslands found on site include fiddleneck (*Amsinckia menziesii*), dove weed (*Croton setiger*) and yellow tansy mustard (*Descurainia pinnata*).

A stand of landscape trees is at the southern end (Figure 4). Red gum eucalyptus (*Eucalyptus camaldulensis*), Peruvian pepper (*Schinus molle*) and chinaberry (*Melia azedarach*) were the two dominant species observed.

The various off-site alignments are mostly unvegetated bare ground. The proposed widening sections are dominated by the ruderal grassland plant community found within the project areas.

Table 1 shows the total acreage breakdown.

Table 1. Impacts

	On-Site (acres)	On-Site (acres)	Off-Site (acres)	Off-Site (acres)	Total inside/Outside
	Inside Criteria Cell	Outside Criteria Cell	Inside Criteria Cell	Outside Criteria Cell	
Project Area	8.87	0.00	0.17	0.00	
Road	0.00	0.00	3.05	1,11	
Total	8.87	0.00	3.22	1.11	13.20

*No temporary impacts.

4.4 Wildlife

The field team recorded wildlife based on individual animals, vocalizations, and other sign (burrows, scat, feathers, droppings, tracks, etc.) on the property and the vicinity of the project. Bird species observed include horned lark (*Eremophila alpestris*), mourning dove (*Zenaida macroura*), Brewer's blackbird (*Euphagus cyanocephalus*), black phoebe (*Sayornis nigricans*), house finch (*Haemorhous neomexicana*) and common raven (*Covus corax*).

The field biologists observed two mammal species, Botta's pocket gopher (*Thomomys bottae*) and Audubon's cottontail (*Sylvilagus audubonii*). Side-blotched lizard (*Uta stansburiana*) was the only reptile species observed. No amphibians were observed. Appendix B has a list of all plant and wildlife species observed.

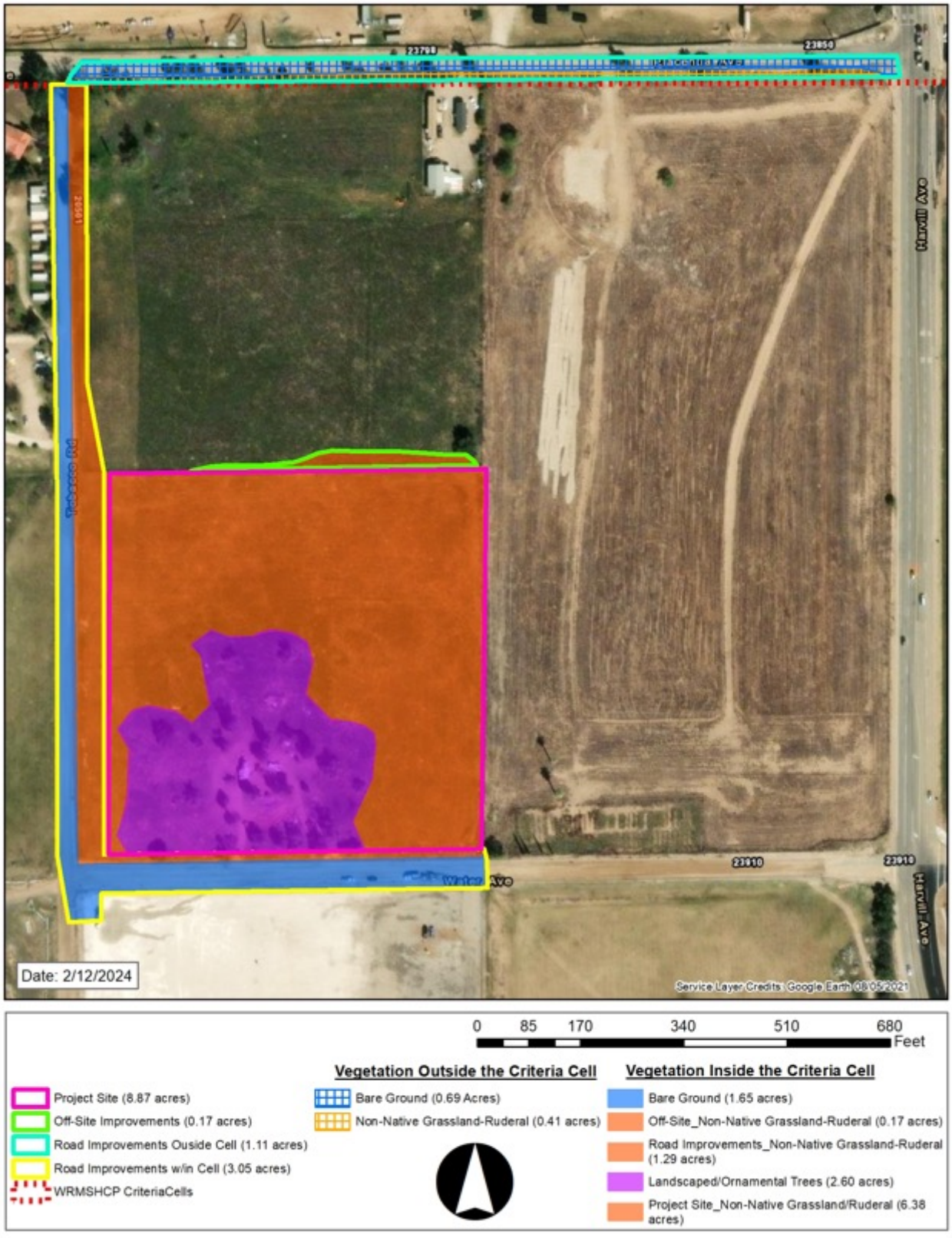

Figure 4. Vegetation Cover.

5.0 MSHCP Consistency Analysis

5.1 Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2)

5.1.1 Riparian/Riverine Areas

The topography is mostly flat with some dirt mounds from leftover from previous disking activity (Photo 18). There are no channels, flow lines or other evidence of confined flow. There are no plants classified as riparian on site, and no suitable trees or shrubs that could provide nesting habitat for the Least Bell's Vireo, Southwestern Willow Flycatcher or Yellow-billed Cuckoo. There are no drainages or riparian habitat on the property or along the off-site areas.

5.1.2 Vernal Pools

The field team surveyed for vernal pools. No ponding or pooling or evidence of such areas was seen. No vernal pools or indications of vernal pools such as flat, unvegetated areas showing evidence of previous ponding, no patterns of inundation, and no distinct water-dependent plant species were found during the surveys.

The property does not support conditions suitable for the formation of vernal pools. The soils are unsuitable for the formation of long-term ponds, and no obligate wetland perennial plant species typical of vernal pools were observed. A soil sample taken to six inches shows only dry, sandy loam soil (Photo 19).

No impacts to vernal pools are expected for the entire project or in the off-site areas.

5.1.3 Riverside Fairy Shrimp, Vernal Pool Shrimp and Santa Rosa Shrimp

As described in Section 5.1.2, the property does not provide conditions suitable for the formation of pools. The soils are unsuitable for the formation of long-term ponds that will last the established minimum two months (the soils are composed of loamy and/or sandy soils).

There are no other sources of standing water, such as cattle ponds or watering holes, or evidence of such ponding, which would provide suitable habitat for the Riverside fairy shrimp, vernal pool fairy shrimp or Santa Rosa fairy shrimp. No impacts to these species are expected for the entire project and the off-sites.

The project is consistent with MSHCP Section 6.1.2.

5.2 Narrow Endemic Plant Species (Section 6.1.3)

The proposed project and offsite areas do not fall within a mapped survey area for Narrow Endemic plant species. The project is consistent with MSHCP Section 6.1.3.

5.3 Additional Survey Needs and Procedures (Section 6.3.2)

5.3.1 Criteria Area Plant Species

The proposed project and offsite areas do not fall within a mapped survey area for Criteria Area plant species.

5.3.2 Burrowing Owl

The field team surveyed the project site, the surrounding area and the off-site areas following the 2006 Regional Conservation Authority (RCA) Burrowing Owl Survey Instructions.

There is suitable habitat for burrowing owls. There are burrows belonging to ground squirrels. The field team found no owls, owl sign or other indicators of burrowing owl use (Photos 20 and 21).

Photo 6. Dirt mounds found scattered on the property.

Photo 7. Soil sample showing dry sandy loam down to six inches.

Photo 8. Dirt mounds providing potentially suitable habitat for burrowing owls.

Photo 9. Ground squirrel burrow (in use by squirrels as of the date of the survey) potentially suitable for owls.

No other structures such as standpipes, open pipes or cement pads with openings under them that could be used by burrowing owl were observed. There is sufficient vegetative cover to provide insect prey suitable for foraging, and the site appears in aerial photographs since 1996 to be mostly fallow, with disking limited to weed control. Properties to the north, west and east have no development present or development activity occurring at the time of the survey (Photos 22 and 23). The property to the west has a small flat area next to slopes occupied by coastal sage scrub. The property to the south was being graded at the time of the survey with front loaders and dump trucks.

The required breeding season surveys were completed on August 31, 2022. No burrowing owls or evidence of burrowing owls was observed.

We assessed the off-site areas on June 6, 2023 for burrowing owl habitat. No habitat was found. A separate report was prepared and submitted to the County.

The project is consistent with MSHCP Section 6.3.2 requirements for site evaluation, findings and additional requirements for mitigation.

5.4 Project Relationship to Reserve Assembly, Mead Valley Area Plan (Section 3.3.10)

The property is located in the MSHCP Conservation Area and falls within Criteria Cell 2529. The conservation requirements for this cell are as follows:

"Conservation within this Cell will contribute to assembly of Proposed Noncontiguous Habitat Block 4. Conservation within this Cell will focus on assembly of coastal sage scrub habitat. Areas conserved within this Cell will be connected to coastal sage scrub habitat proposed for conservation in Cell Group B to the west. Conservation within this Cell will range from 5%-15% of the Cell focusing in the western portion of the Cell."

The project site and the alignment areas do not contain any coastal sage scrub. Preservation of these areas would not contribute to the conservation of coastal sage scrub habitat within the cell or proposed for conservation in Cell Group B to the west. The property does not lie within the 5 to 15 percent of the cell identified for conservation in the western part of the cell and is separated from the preferred coastal sage scrub habitat by a disked slope and an existing dirt road (Water Road).

Nevertheless, the County may require a Habitat Acquisition and Negotiation Study (HANS) to be prepared and HANS application to be submitted to determine whether this property should be acquired by them.

The project is consistent with MSHCP Section 3.3.10 evaluation, findings and recommendations.

5.5 Guidelines Pertaining to the Urban/Wildland Interface (Section 6.1.4).

The site is not immediately adjacent to wildlands and open space areas and has been subject to human use. It is close to the Motte Rimrock Reserve that forms part of the conservation lands under the MSHCP. The project design is conceptual and may change in certain aspects. In response we have made only a general evaluation of interface impacts.

The potential indirect impacts may include noise, lighting, dust, invasive plants, and toxic materials such as herbicides and pesticides used in landscaping and maintenance. Because the project is both downhill and downwind from the conserved areas, including Motte Rimrock Reserve, vehicular residues such as non-hazardous oils and fuels used during project operations are not expected to impact the areas identified for conservation.

Photo 10. Property to the east of the subject parcel.

Photo 11. Property to the north of the subject parcel.

Based on the current project design, there are offsite disturbances in the existing dirt and paved roads. These site disturbances did not impact sensitive resources.

There is one offsite disturbance that extends north of the northern boundary. We surveyed this area visually during the general and burrowing owl survey work, as well as walking the eastern half. The habitat in this area is the same as that on the property. No sensitive resources were found in this area.

There are no sensitive habitats along the off-site alignments.

5.5.1 Drainage

The drainage from adjacent development areas into MSHCP-protected areas includes runoff of water, soil, as well as inorganic and organic matter.

The Project site is flat and would have no drainage except during rainfall when sheet runoff is present. Available evidence indicates that the topography slopes very slightly to the east. No flow, natural or otherwise, is expected to impact Criteria Cell 2529 and the Motte Rimrock Reserve, which lie to the west.

The Project applicant has prepared a Water Quality Management Plan (WQMP) that identifies stormwater management for the building operations/post construction. Overall, the existing drainage patterns were identified, and the design preserves the overall drainage pattern. As part of the Project, the on-site storm drain system will be constructed to collect and convey the storm water runoff in a northeasterly direction to proposed permanent structural best management practices (BMPs) for treatment purpose. The site BMP's will consist of pre-treatment filtering systems prior to stormwater infiltration by underground storm chambers. The site will attenuate the Q-100 6 hr. design storm and the VBMP will be infiltrated. The chambers are sized to attenuate to below Q-100 predevelopment flowrates and water will discharge through 4 (four) 12-inch diameter storm drain pipes to an overflow "U" shaped concrete channel and weirs to the adjacent County of Riverside easterly parcel. There will also be a 3-foot- wide stabilization blanket consisting of grouted rip-rap continuous to the property line discharge via sheet flow. The design attenuates the Q-100 from 15 cubic feeet per second (c.f.s) to 7.7 c.f.s. Construction of the Project will also require the contractor to prepare a Stormwater Pollution Prevention Plan (SWPPP) as the site is more than 1 acre.

5.5.2 Toxics

Operation of motor vehicles in an undeveloped area close to open space has a potential to introduce undesirable petroleum products and solvents into the natural environment. Potentially hazardous materials, such as petroleum products, and other products such as paints, solvents, and cleaning products may be stored on-site. However, all activity involving hazardous substances would be conducted in accordance with applicable local, State, and Federal safety standards. Any required motor vehicle repairs and maintenance will only be conducted in designated areas, away from sites that risk introducing hazardous materials in areas subject to flooding.

The number and quantity of hazardous materials on the project site is anticipated to be small and on an as -needed basis. The facility would require a business emergency plan for the storage of hazardous materials greater than 55 gallons, 200 cubic feet or 500 pounds, or any acutely hazardous materials or extremely hazardous substances. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Driving along roads with dirt surfaces creates dust. Dust deposited on plants can affect photosynthesis, respiration, transpiration and allow the penetration of phytotoxic gaseous pollutants in plant cells. Dust also affects wildlife respiratory and vision processes which are critical for movement and foraging.

Fugitive dust control is a three-step process of (1) avoidance, (2) minimization; and (3) mitigation. Good project planning will help minimize dust emissions by modifying or eliminating non-essential or avoidable dust-generating activities. The project will be conditioned to reduce dust emissions by capturing, collecting, or containing emissions during construction and operation.

5.5.3 Lighting

Light pollution is one of the most rapidly increasing types of environmental degradation (Falchi et al. 2011). Nighttime light affects daily and seasonal wildlife cycles. It disturbs nesting and roosting animals and affects the ability for wildlife to detect and consume prey and food items. It may also affect breeding cycles of certain species. Scientific studies estimate that more than 80% of the world's population live under light-polluted skies. In the US, that number exceeds 99%, an reflects a marked increase in just the last few years (Falchi et al 2011, Falchi et al 2016). Floodlights and ceilometers attract and kill large numbers of migratory birds and bats at lighthouses and telecommunication towers (Rich and Longcore eds. 2006).

The proposed project is located in an area of unincorporated Riverside County undergoing extensive industrial development and is experiencing increasing levels of light and/or glare associated with this type of development. Light and glare from vehicles entering/exiting the project site would increase lighting sources in the project area. Active land uses adjacent to the project site are unknown. There could be lighting associated with the on-site buildings and parking areas.

Implementation of the proposed project is not anticipated to induce substantial light or glare or expose adjacent properties to unacceptable levels. Site lighting will be low-level high-pressure sodium that will be pointed downward at the parking lot and/or along the edges of the building. Nevertheless, shielding, and careful selection of lights that are not rich in blue light will be incorporated in to ensure ambient lighting in the vicinity of the site is not increased and does not affect wildlife. This on-site lighting plan requires the identification of the type, intensity, and location of each proposed on-site lighting source. The submittal of this plan is required as evidence that the proposed on-site lighting sources would meet County lighting standards.

5.5.4 Noise

The MSHCP states that "Proposed noise generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms or walls to minimize the effects of noise on the MSHCP Conservation Area resources pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards." A Noise Impact Analysis (NIA) is not yet available for review in this report. The warehouse is designed to house tenant, Thrifty Oil, and includes one 163,270 square-foot warehouse with X number of bays, one grade level dock and 24 high docks and two, 4,000 SF each area of office spaces (two level office).

Noise associated with the project will occur during the initial grading and building construction, which would be temporary. Operational noise will be a warehouse which is allowed within the zoning with a public use permit. The project will be conditioned to meet all applicable Noise policies.

Limiting operations to daylight hours will reduce the potential effect on nocturnal mammals and nocturnal bird species such as owls and nighthawks. The operating hours of the Thrifty Oil Plot Plan No. 2200047 are unknown at this time.

5.5.5 Invasives

Landscaping for the proposed development may have an indirect impact on adjacent lands and Criteria Cell acquisition areas. Invasive species, particularly those that generate airborne seed and pollen, could spread to adjacent areas.

Invasive plants pose a primary threat to rare and endangered species and the integrity and function of North American ecosystems (Blossey 1999). These species are often perturbation dependent and can occupy a variety of conditions in natural and semi-natural areas, often outcompeting native species. The California Department of Fish and Wildlife (CDFW), California Invasive Plant Council (Cal-IPC), California Native Plant Society (CNPS) and others work actively to control the widespread proliferation of invasive plants.

The MSHCP addresses invasive species control. In planning and landscaping the project proponent shall avoid the plant species listed in Appendix C [taken from the MSHCP, attached] and shall require revisions to landscape plans (subject to the limitations of their jurisdiction) to avoid the use of invasive species. The purpose is to avoid the escape and spread of these species across the Urban/Wildlands Interface into open space to the west, including the Motte Rimrock Reserve.

5.5.6 Barriers

The MSHCP states that "Proposed land uses adjacent to the MSHCP Conservation Area shall incorporate barriers, where appropriate in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass or dumping in the MSHCP Conservation Area. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage and/or other appropriate mechanisms."

NRAI does not anticipate any unauthorized public access, domestic animal predation, illegal trespass or dumping to occur as a result of project development. The type of land use and facility security measures would deter any such activities.

5.5.7 Grading/Land Development

The MSHCP requires that "Manufactured slopes associated with proposed site development shall not extend into the MSHCP Conservation Area [containing the Motte Rimrock Reserve]".

The proposed project does not extend outside the existing boundaries of the parcel, and no manufactured slopes are included that would extend into the Wildlands to the west.

The project is consistent with MSHCP Section 6.1.4.

6.0 Habitat Conservation Plan for the Stephens Kangaroo Rat

The species objectives for the Stephens kangaroo rat (SKR) in the Western Riverside MSHCP were designed to incorporate the Long-Term Stephens Kangaroo Rat Habitat Conservation Plan (SKR Plan). Any projects that are within the MSHCP boundaries must meet the SKR Plan requirements.

The property is located within the SKR fee area. Payment of the fee if not already made will be required.

7.0 Jurisdictional Waters

The site is flat and without major changes in elevation. There are no channels, flow lines or other evidence of confined flow within the project area or the off-site areas. There are no jurisdictional waters present.

8.0 Raptors, Migratory Birds, and Habitat

There are trees in the southern section of the property and along the northern section of Tobacco Road (Photo 5). Nesting in these trees has very likely already been affected by the presence of the former landowners and existing landowners. Depending upon timing, direct impacts from construction[2] may occur to nesting birds in the grove of trees.

NRAI recommends the following measures shall be implemented to address potential impacts from construction.

- If start of construction occurs between February 1 and August 31, then a qualified biologist shall conduct a breeding bird survey no more than three days prior to the start of construction to determine if nesting is occurring. Depending upon timing, this survey can be conducted concurrent with burrowing owl surveys.
- If occupied nests are found, they shall not be disturbed unless the qualified biologist verifies through non-invasive methods that either (a) the adult birds have not begun egg-laying and incubation; or (b) the juveniles from the occupied nests are capable of independent survival.
- If the biologist is not able to verify one of the above conditions, then no disturbance shall occur within a distance specified by the qualified biologist for each nest or nesting site. The qualified biologist will determine the appropriate distance in consultation with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service.

There is very limited nesting habitat elsewhere on the property. The disking of the site has removed any shrub cover and disrupted ground-nesting attempts for almost all bird species except possibly burrowing owl that may colonize the site. Potential impacts to burrowing owl are addressed in Section 5.3.2.

[2] Construction includes selection of staging areas, demolition, tree, trash and debris removal, placement of equipment and machinery on to the property preparatory to grading, and any other project-related activity that increases noise and human activity on the project site beyond existing levels. Emergency measures are exempt from this definition

9.0 References

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Appendix A. Photos 4 - 15, Offsite Improvement

Photo 4. Corner of Tobacco Road and Placentia Avenue. Looking east along Placentia Avenue.

Photo 5. Corner of Tobacco Road and Placentia Avenue. Looking south along Tobacco Road.

Photo 6. Approximately halfway between Placentia Street and the northern boundary of the project. Looking north along Tobacco Road.

Photo 7. Corner of Tobacco Road and Water Street. Looking east along Water Street.

Photo 8. Approximately halfway along Water Street. Looking east toward Harvill Avenue.

Photo 9. Approximately halfway along Water Street. Looking west toward Tobacco Road.

Photo 10. Corner of Water Street and Harvill Avenue. Looking east along Water Street.

Photo 11. Corner of Harvill Avenue and Water Street. Looking southwest.

Photo 12. Corner of Harvill Avenue and Water Street. Looking south along Harvill Avenue.

Photo 13. Harvill Avenue near Water Street. Looking south along Harvill Avenue.

Photo 14. Corner of Harvill Avenue and Placentia Street. Looking west down Placentia Street.

Photo 15. Representative habitat along the southern boundary of Placentia Street.

Appendix B. Plants and Wildlife Species Observed

* Indicates non-native species

PLANTS

Scientific Name	Common Name
DICOTYLEDONS/DICOTS	
AMARANTHACEAE	**AMARANTH FAMILY**
Amaranthus albus *	Tumbleweed
Amaranthus blitoides	Prostrate pigweed
ANACARDIACEAE	**CASHEW FAMILY**
Schinus molle *	Peruvian Pepper
APOCYNACEAE	**DOGBANE FAMILY**
Nerium oleander *	Oleander
ASTERACEAE	**SUNFLOWER FAMILY**
Erigeron bonariensis *	Flax-leaved horseweed
*Erigeron canadensis**	Mare's tail
Helianthus annuus	Hairy leaved sunflower
Lactuca serriola *	Prickly Lettuce
Oncosiphon pilulifer *	Stinknet
Matricaria discoidea	Pineapple weed
BORAGINACEAE	**BORAGE FAMILY**
Amsinckia menziesii	Fiddleneck
Heliotropium curassavicum	Chinese parsley
BRASSICACEAE	**MUSTARD FAMILY**
Descurainia pinnata	Yellow tansy mustard
Hirschfeldia incana *	Mustard
Sisymbrium irio *	London rocket
CHENOPODIACEAE	**GOOSEFOOT FAMILY**
Bassia hyssopifolia *	Five horn bassia
Salsola tragus *	Russian thistle
EUPHORBIACEAE	**SPURGE FAMILY**
Croton setiger	Dove weed
FABACEAE	**PEA FAMILY**
Acacia longifolia *	Golden wattle
Melilotus indica *	Sweet yellow clover
GERANIACEAE	**GERANIUM FAMILY**
*Erodium cicutarium**	Red-stemmed filaree
MALVACEAE	**MALLOW FAMILY**
Malva parvifolia *	Cheeseweed
MELIACEAE	**CHINA BERRY FAMILY**
*Melia azedarach**	China berry Tree
MYRTACEAE	**MYRTLE FAMILY**
Eucalyptus camaldulensis *	Red gum eucalyptus

SOLANACEAE	**NIGHTSHADE FAMILY**
Datura wrightii	Jimsonweed
Nicotiana glauca	Tree tobacco
ZYGOPHYLLACEAE	**CALTROP FAMILY**
Tribulus terrestris	Puncture Vine

MONOCOTYLEDONS/MONOCOTS

PALMACEAE	**PALM FAMILY**
Washingtonia robusta	Mexican fan palm
POACEAE	**GRASS FAMILY**
Avena barbata *	Slender wild oats
Bromus diandrus *	Ripgut Brome
Bromus madritensis ssp. *rubens* *	Foxtail brome
Cynodon dactylon *	Crabgrass
Schismus barbatus *	Old han schismus

WILDLIFE

REPTILES

PHRYNOSOMATIDAE	**SPINY LIZARDS**
Uta stansburiana elegans	Western Side-blotched Lizard

BIRDS

ACCIPITRIDAE	**HAWKS and EAGLES**
Buteo jamaicensis	Red-tailed Hawk
ALAUDIDAE	**LARKS**
Eremophila alpestris	Horned Lark
COLUMBIDAE	**PIGEONS AND DOVES**
Zenaida macroura	Mourning Dove
CORVIDAE	**CROWS, JAYS AND RAVENS**
Corvus corax	Common Raven
Corvus brachyrhynchos	American Crow
CUCULIDAE	**TYPICAL CUCKOOS**
Geococcyx californianus	Greater Roadrunner
PARULIDAE	**WOOD WARBLERS**
Setophaga coronata	Yellow-rumped Warbler
FRINGILLIDAE	**FINCHES**
Haemorhous mexicanus	House Finch
TYRANNIDAE	**TYRANT FLYCATCHERS**
Tyrannus verticalis	Western Kingbird
Sayornis saya	Say's Phoebe
MIMIDAE	**MIMIC THRUSHES**
Toxostoma redivivum	California Thrasher
SYLVIIDAE	**OLD WORLD WARBLERS AND GNATCATCHERS**
Regulus calendula	Ruby-crowned Kinglet

TROCHLIIDAE	**HUMMINGBIRDS**
Calypte anna	Anna's Hummingbird
TROGLODYTIDAE	**WRENS**
Thryomanes bewickii	Bewick's Wren
EMBERIZIDAE	**SPARROWS**
Zonotrichia leucophrys	White-crowned Sparrow
Chondestes grammacus	Lark Sparrow
Melozone crissalis	California Towhee

MAMMALS

CANIDAE	**DOGS, COYOTES, FOXES**
Canis latrans	Coyote
Urocyon cinereoargenteus	Gray Fox
GEOMYIDAE	**POCKET GOPHERS**
Thomomys bottae	Botta's Pocket Gopher
SCIURIDAE	**SQUIRRELS**
Spermophilus beecheyi	Beechey Ground Squirrel
LAGOMORPHIDAE	**RABBITS, HARES**
Lepus californicus	Black-tailed Hare
Sylvilagus audubonii	Audubon's Cottontail

Appendix C. Plants to be Avoided in Areas Adjacent to Wildlands

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

BOTANICAL NAME	COMMON NAME
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

BOTANICAL NAME	COMMON NAME
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

BOTANICAL NAME	COMMON NAME
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.