Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis

Brown Strauss Industrial Project

Prepared for:

Brown Strauss, Inc.

Prepared by:

NOREAS Inc.
Lenny Malo, MS
Biological & Natural Resources Services
16361 Scientific Way
Irvine, CA 92618-4356
lenny.malo@noreasinc.com | 714.458.5695

July 2023

Assessor's Parcel Numbers
540-180-020, 540-180-022 and 540-180-026.

Contents

1 EXECUTIVE SUMMARY 1
2 INTRODUCTION 2
2.1 Project Area 2
2.2 Project Description 3
2.3 Covered Roads 3
2.4 Covered Public Access Activities 3
2.5 General Setting 3
3 RESERVE ASSEMBLY ANALYSIS 4
3.1 Public Quasi-Public Lands 5
3.1.1 Public Quasi-Public Lands in Reserve Assembly Analysis 5
3.1.2 Project Impacts to Public Quasi-Public Lands 5
4 VEGETATION MAPPING 5
5 PROTECTION OF SPECIES ASSOCIATED WITH RIPARIAN/RIVERINE AREAS AND VERNAL POOLS (SECTION 6.1.2) 6
5.1 Riparian/Riverine 7
5.1.1 Methods 8
5.1.2 Existing Conditions and Results 9
5.1.3 Impacts 9
5.1.4 Mitigation 9
5.2 Vernal Pools 9
5.2.1 Methods 10
5.2.2 Existing Conditions and Results 10
5.2.3 Impacts 10
5.2.4 Mitigation 11
5.3 Fairy Shrimp 11
5.4 Riparian Birds 11
6 PROTECTION OF NARROW ENDEMIC PLANT SPECIES (SECTION 6.1.3) 11
6.1.1 Methods 11
6.1.2 Existing Conditions and Results 11
6.1.3 Impacts 11
6.1.4 Mitigation 12
7 ADDITIONAL SURVEY NEEDS AND PROCEDURES (SECTION 6.3.2) 13
7.1 MSHCP Criteria Area Sensitive Plant Species 13
7.2 Burrowing Owl 13
7.2.1 Methods 13
7.2.2 Existing Conditions and Results 14
7.2.3 Impacts 14
7.2.4 Mitigation 14
8 INFORMATION ON OTHER SPECIES 15

8.1 Delhi Sands Flower Loving Fly 15
8.2 Species Not Adequately Conserved 15
9 GUIDELINES PERTAINING TO THE URBAN/WILDLANDS INTERFACE (SECTION 6.1.4) 15
10 BEST MANAGEMENT PRACTICES (VOLUME I, APPENDIX C) 15
11 CERTIFICATION 18
12 REFERENCES 19

List of Figures

Figure 1 Regional Location Map
Figure 2 Site Vicinity Map
Figure 3 MSHCP Criteria Cells
Figure 4 MSHCP Cores, Linkages and Conserved Lands
Figure 5 Vegetation Community/Land Cover Types
Figure 6 RCA MSHCP Vegetation 2012
Figure 7 Soils Map
Figure 8 Literature Review
Figure 9 Critical Habitat
Figure 10 National Wetland Inventory

List of Tables

Table 1. Vegetation Community/Land Cover Types 6
Table 2. MSHCP Best Management Practices Applicability (Volume 1, Appendix C) 15

Appendices

Appendix A Site Plan
Appendix B Plant Species Observed Within the Study Area
Appendix C Wildlife Species Observed Within the Study Area
Appendix D Special-Status Species and Their Potential to Occur Within the Project Site
Appendix E Burrowing Owl Survey Report
Appendix F Narrow Endemic Plant Survey Report
Appendix G Photographic Log
Appendix H Project GIS Files (provided separately)

1 EXECUTIVE SUMMARY

The proposed Brown Strauss Industrial Project (hereinafter referred to as the "Project") consists of a 42,510 square foot (SF) warehouse, a 3,434 SF office, two 500 SF enclosed saw sheds attached to the warehouse, and an outdoor storage yard. The Project occurs at 1219 and 1431 West Lincoln Street, in the City of Banning, Riverside County, California, (Assessor's Parcel Numbers [APNs] 540-180-020, 540-180-022 and 540-180-026. For the purposes of this document, the "study area" includes the Project's proposed ground disturbance footprint (Project Site) and a buffer (Figures 1 and 2). Additionally, the Project is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), within the Pass Area Plan, Badlands Habitat Management Unit. The Project Site is not within the boundaries of any MSHCP established Subunit, Cell Group, Criteria Cell, Public/Quasi-Public Land, Linkages/Cores, Conserved Lands, or Regional Conservation Authority (RCA) Easements (Figures 3 and 4).

The Project limits of work only include 14.7-acres of developed, anthropogenically disturbed, and ruderal land cover types (Figure 5). The Project's northern boundary is paralleled by an active rail road. As such, the study area for the Project extended beyond its 14.7-acre permanent disturbance footprint, and included roughly 72.7-acres. According to the RCA MSHCP Information Map, Project limits lie partially - or completely, within predetermined survey areas for the Burrowing Owl (*Athene cunicularia*), and narrow endemic sensitive plant species (Marvin's onion [*Allium marvinii*] and Many-stemmed dudleya [*Dudleya multicaulis*]). But the Project is not within a survey area for criteria area sensitive plant species, amphibians, invertebrates, or mammals.

In 2012 the MSHCP mapped the vegetation within the Project Site as Urban (GISD 2023, Figure 6). In 2022 and 2023, no Burrowing Owl and no narrow endemic sensitive plant species were observed within the Project Site. To that end, two vegetation communities/land cover types were mapped within the study area: Developed/Disturbed and Ruderal. Additionally, no federal- or state-listed flora or fauna were observed within the study area during the 2022 and 2023 field surveys. The Project's 14.7-acre permanent disturbance footprint (Project Site) is comprised of developed, disturbed and non-native land cover types. The Project is not collocated with any United States Fish and Wildlife Service (USFWS) designated critical habitat (Figure 9), nor were any special status species observed during the 2022 and 2023 field surveys. No nesting birds, remnant raptor nests, or bat guano have been detected within the Project Site either. The Project's 14.7-acre permanent disturbance footprint has little value as suitable breeding, nesting, and foraging habitat for native species. Furthermore, the Project Site has limited – if any, worth as a low-quality migration corridor or overland dispersal habitat for wildlife, because it is severely movement constrained by the surrounding residential, industrial / commercial developments, and public infrastructure.

The target conservation acreage range for the Pass Area Plan is 22,510 – 27,895 acres; it is composed of approximately 13,970 acres of existing Public/Quasi-Public Lands and 8,540 – 13,925 acres of Additional Reserve Lands. The City of Banning is located entirely within the Pass

Plan. The target acreage range within the City of Banning is 50 - 90 acres. Furthermore, conservation within the Pass Area Plan is centered around Proposed Constrained Linkage 22 and 23, Proposed Core 3 and a portion of Proposed Linkage 6. The Project's 14.7-acre permanent disturbance footprint includes no lands within - or immediately adjacent to MSHCP Proposed Constrained Linkage 22 and 23, Proposed Core 3, Proposed Linkage 6, Cell Groups, Criteria Cells or Subunits, Public/Quasi-Public Land, Conserved Lands, or RCA Easements. As such, the Project is not anticipated to adversely affect any of the MSHCP Pass Area Plan's Planning Species, Biological Issues and Considerations, Criteria for the aforesaid Subunits, or Reserve Assemble (Figures 3 and 4).

Nonetheless, Brown Strauss, Inc. will commit to a pre-construction Burrowing Owl survey that will be conducted prior to initiation of ground disturbance. If Burrowing Owls are observed, a Burrowing Owl Protection and Relocation Plan will be prepared.

2 INTRODUCTION

The purpose of this Consistency Analysis Report (Analysis) is to summarize the biological data for the Brown Strauss Industrial Project and to document its consistency with the goals and objectives of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). In a general sense, the Project consists of the construction of a warehouse, administrative office, two enclosed saw sheds, and an outdoor storage yard in the City of Banning, Riverside County, California.

2.1 Project Area

The Project's study area is defined as its proposed physical ground disturbance footprint (Project Site), plus a buffer (Figures 1 and 2). The Project includes Assessor Parcel Numbers (APNs) 540-180-020, 540-180-022 and 540-180-026. The Project's "study area" includes all lands to be affected directly and/or indirectly by the Project, and are not merely the immediate lands involved in the action itself. The APNs associated with the Project's "study area" include 540180032, 540180043, 540180044, 540180042, 538220002, 538220005, 540230001, 540230003, 540230030, 540230029, 540230005, 540230033, 540230019, 540230007, 540230014, 540230009, 540180030 and 540180057.

The Project Site can be found on the Beaumont United States Geological Survey (USGS) 7.5-Minute Topographic Quadrangle Map (USGS 1984) - Section 9, of Township 3 South and Range 1 East. The Project Site occurs at an approximate elevation of 2,400 ft. above mean sea level (MSL). Land use in the surrounding vicinity includes commercial, agriculture, residential and industrial endeavors. The Project's northern boundary is paralleled by an active rail road. The lands to be impacted by the Project include no MSHCP established Subunits, Cell Groups, Criteria Cells, Public/Quasi-Public Lands, Linkages/Cores, Conserved Lands, or RCA Easements (Figures 3 and 4). The Project's construction limit is 14.7-acres (Figure 2). The study area consists of Developed/Disturbed (55.03-acres) and Ruderal (17.73 - acres) land cover types. Representative photos of the study area are provided in Appendix G. The Project includes no off-site features, or staging areas. The Project does not include any proposed temporary impacts.

2.2 Project Description

The Project consists of the construction of a 42,510 square foot (SF) warehouse, a 3,434 SF office, two 500 SF enclosed saw sheds attached to the warehouse, and an outdoor storage yard. The Project's construction limit is 14.7-acres. The study area consists of Developed/Disturbed (55.03-acres) and Ruderal (17.73 - acres) land cover types. The Project includes street improvements including curb, gutter, and pavement to the right-of-way along Lincoln Street, but does not include any off-site staging areas. The Project does not include any proposed temporary impacts. A construction Site Plan is included within Appendix A. This Project does not include regular weed abatement or fuel modification zones, as the entire 14.7-acres disturbance footprint will be built out.

2.3 Covered Roads

The Project Site is located at 1219 and 1431 West Lincoln Street within the City of Banning, Riverside County, California (Figures 1 and 2). Lincoln Street is a Covered Road – as identified by the RCA. Therefore, MSHCP Covered Operations and Maintenance Activities – may be applicable to Lincoln Street.

2.4 Covered Public Access Activities

The Project involves no construction or improvements to trails or other public access facility, referenced within MSHCP Section 7.4.2. Therefore, this MSHCP Section is not applicable.

2.5 General Setting

Two soil types occur within the Project Site - based on the U.S. Department of Agriculture, Natural Resources Conservation Service (USDA-NRCS) Soil Survey data sets (Figure 7):

- Greenfield sandy loam, 2 to 8 percent slopes, eroded; and
- Ramona sandy loam, 2 to 5 percent slopes, eroded.

Of the above referenced soil types, none are classified as hydric, and neither are known to support seasonal wetlands or special status invertebrates either. With that said, it is worth noting that the USDA-NRCS Soil Survey data, is predominately collected and developed through the use of historic aerial photographic interpretation - with limited ground truthing. Therefore, the data the USDA-NRCS Soil Survey provides does not represent precise information about the presence - or absence, of a specific soil, soil inclusion or land cover within an exact location in 2023. NRCS Soil Survey data users are cautioned that due to the limitations of mapping – primarily through aerial photo interpretation, a percentage of unique soil types may have gone unidentified - or misidentified.

Land use in the surrounding vicinity includes commercial, agriculture, residential and industrial endeavors. In 2012 the MSHCP mapped the vegetation within the Project Site as Urban (GISD 2022, Figure 6). In 2023, two vegetation communities/land cover types were detected within the Project Site: Developed/Disturbed and Ruderal (Figure 5).

The Project's construction limit is 14.7-acres (Figure 2). The study area consists of Developed/Disturbed (55.03-acres) and Ruderal (17.73 - acres) land cover types. The Project's 14.7-acre permanent disturbance footprint (also referred to as the Project Site within this document) is comprised entirely of ruderal land cover types. The Project Site is not collocated with any USFWS designated critical habitat (Figure 9), nor were any special status species detected during the 2022 and 2023 field surveys. No rare plants, no nesting birds, no Burrowing Owls, no remnant raptor nests, and no bat guano have been detected within the Project Site either. Special-status species known to occur within several miles of the Project Site, and their potential for occurrence within it, are detailed within Appendix D and Figure 8.

Wildlife species observed within the study area consisted of commonly-occurring species - including, but not limited to, rock pigeon (*Columba livia*), Red-tailed hawk (*Buteo jamaicensis*) common raven (*Corvus corax*), and Side-blotched Lizard (*Uta stansburiana*). A complete list of wildlife species detected within and adjacent to the Project Site during the 2022 and 2023 field surveys are provided in Appendix C.

3 RESERVE ASSEMBLY ANALYSIS

The Project Site is located within the Pass Area Plan. But not within the boundaries of any MSHCP established Subunit, Cell Group, Criteria Cell, Public/Quasi-Public Land, Linkages/Cores, Conserved Lands, or RCA Easements. The target conservation acreage range for The Pass Area Plan is 22,510 – 27,895 acres; it is composed of approximately 13,970 acres of existing Public/Quasi-Public Lands and 8,540 – 13,925 acres of Additional Reserve Lands. The City of Banning is located entirely within the Pass Plan. The target acreage range within the City of Banning is 50 - 90 acres. Furthermore, conservation within the Pass Area Plan is centered around Proposed Constrained Linkage 22 and 23, Proposed Core 3 and a portion of Proposed Linkage 6. The Project's 14.7-acre permanent disturbance footprint includes no lands within or immediately adjacent to MSHCP Proposed Constrained Linkage 22 and 23, Proposed Core 3 and a portion of Proposed Linkage 6, Cell Groups, Criteria Cells or Subunits. As such, the Project is not anticipated to adversely affect any of the MSHCP Pass Area Plan's Planning Species, Biological Issues and Considerations, and Criteria for the aforesaid Subunits.

The Project's 14.7-acre permanent disturbance footprint does not impact any of the Pass Area Plan's 4 Subunits. The Project is not anticipated to adversely affect any of the MSHCP Pass Area Plan's Planning Species, Biological Issues and Considerations, and Criteria for the aforesaid Subunits. As stated above, the Project Site includes no land, nor is it connected, or adjacent to any Cell Groups, Criteria Cells, habitat proposed for conservation, locales proposed for additional reserve assembly, cores or linkages within the MSHCP.

According to the RCA MSHCP Information Map, the Project limits lie partially or completely within predetermined survey areas for the Burrowing Owl and narrow endemic plant species. But the Project Site is not within a survey area for criteria area plant species, amphibians or mammals. Therefore, a Burrowing Owl habitat suitability assessment was conducted in accordance with the MSHCP Burrowing Owl survey instructions. Since suitable habitat was present for owls, surveys were performed. Similarly - per the MSHCP, lands that occur within a survey area for narrow

endemic, plant species, must have a habitat evaluation for the species. Since suitable habitat was present – albeit low quality, for narrow endemic pant species, surveys were performed. No special status animals, or narrow endemic pant species were observed within the Project Site during the 2022 and 2023 field survey events. Furthermore, the Project is not collocated with any USFWS designated critical habitat (Figure 9). Based on the results of the 2022 and 2023 field surveys, no Burrowing Owls and no narrow endemic plant species were observed within, or adjacent to the Project Site.

3.1 Public Quasi-Public Lands

The majority of the cities in western Riverside County, have contributed open space/land to help establish the MSHCP Conservation Area. These lands are described in the MSHCP as Public/Quasi-Public (PQP) Lands.

3.1.1 Public Quasi-Public Lands in Reserve Assembly Analysis

P/QP Lands are a subset of MSHCP Conservation Area lands that are known to be in public/private ownership and expected to be managed for open space value and/or in a manner that contributes to the Conservation of Covered Species (including lands contained in existing reserves). The Project's 14.7-acre permanent disturbance footprint is not within, nor is it immediately adjacent to - PQP lands (Figure 4).

3.1.2 Project Impacts to Public Quasi-Public Lands

The Project will not directly impact any PQP lands because its disturbance footprint is not located with PQP Lands.

4 VEGETATION MAPPING

On 30 November 2022, a pedestrian-based field survey was performed by NOREAS Inc. (NOREAS) to define general and dominant land cover types, vegetation types, plant community sizes, habitat types, and species present within communities. Type descriptions were based on observed dominant cover and vegetation composition; and were derived from the criteria and definitions of widely accepted land classification systems (Holland 1986; and Sawyer et al. 2009). Plants were identified in the field to the lowest taxonomic level sufficient to determine whether the species detected were non-native, native, or special-status. Plants of uncertain identity were subsequently identified from taxonomic keys (Baldwin et al. 2012). Scientific and common species names were recorded according to Baldwin et al. (2012) and those detailed in Sections 2.1.3 and 6.1.2 of the MSHCP. This method of floristic survey was conducted to safeguard that special-status plant species were not inadvertently overlooked because they were not targeted during surveys.

Two vegetation communities/land cover types were detected within the study area: Developed/Disturbed and Ruderal. (Table 1, and Figure 5). Cover types are described in detail below.

Developed/Disturbed - Disturbed/Developed lands within the study area include locales that have been developed, paved, cleared, graded, or otherwise altered by anthropogenic

activities (i.e., industrial warehouses, access roads, concrete pads, ornamental landscaping, residential, industrial facilities, storage yards, commercial enterprises, etc.). Common non-native plants species detected within this type included ripgut brome (*Bromus diandrus*), Sahara mustard (*Brassica Tournefortii)* and Schismus (*Schismus barbatus*).

Ruderal - The ruderal vegetation community includes locales that have been subject to recent grading, clearing, or other physical human modification of soils and/or vegetation. These lands also include areas with exposed soils with minimal vegetation, and moderate cover by various non-native annual grasses, and weeds (adapted for growth on substrates subject to disturbance). Common non-native plants species detected within this type included Maltese star-thistle (*Centaurea melitensis*), stinknet (*Oncosiphon piluliferum*), and cheeseweed (*Malva neglecta*). The native fiddleneck (*Amsinckia Intermedia*) was also observed sporadically throughout this vegetation community.

Table 1. Vegetation Community/Land Cover Types

Vegetation Community/Land Cover Type	Study Area Acres	Project Site Acres	Permanent Impact Acres	Permanent Impact Acres Inside a Subunit, Cell Group, Criteria Cell, PQP Lands, Linkages/Cores, Conserved Lands, or RCA Conservation Easements	Permanent Impact Acres Outside a Subunit, Cell Group, Criteria Cell, PQP Lands, Linkages/Cores, Conserved Lands, or RCA Conservation Easements.
Disturbed /Developed	55.03	0.00	0.00	0	0.00
Ruderal	17.73	14.77	14.77	0	14.77
Total	**72.76**	**14.77**	**14.77**	0	**14.77**

In general terms, the plants observed in the study area included a range of native and non-native species common to disturbed habitats, etc. Commonly-occurring species included: ripgut brome, Sahara mustard, and Schismus, among others. Please note that in 2012, the MSHCP mapped the vegetation within the Project Site as Urban Lands (GISD 2021; Figure 6). A comprehensive list of plant species observed during the 2022 surveys is presented in Appendix B.

5 PROTECTION OF SPECIES ASSOCIATED WITH RIPARIAN/RIVERINE AREAS AND VERNAL POOLS (SECTION 6.1.2)

According to Section 6.1.2 of the MSHCP:

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

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

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

"With the exception of wetlands created for the purpose of providing wetlands 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 in these definitions."

5.1 Riparian/Riverine

As defined under Section 6.1.2 of the MSHCP, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, riparian/riverine areas are areas dominated by trees, shrubs, persistent emergent plants, or emergent mosses and lichens which occur close to or are dependent upon nearby freshwater, or areas with freshwater flowing during all or a portion of the year. Conservation of these areas is intended to protect habitat that is essential to several listed or special-status water-dependent fish, amphibian, avian, and plant species. This assessment is independent from considerations given to Waters of the United States (WoUS) and Waters of the State (WoS), under the Clean Water Act (CWA), the California Porter-Cologne Water Quality Control Act, and California Department of Fish and Wildlife (CDFW) jurisdictional streambed under the California Fish and Game Code (FGC).

5.1.1 Methods

The Project Site was evaluated via field surveys on 30 November 2022, 12 March and 05 April of 2023 for the presence of riverine/riparian and vernal pool areas, and jurisdictional waters (i.e., WoUS as regulated by the United States Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB), streambeds and associated riparian habitat as regulated by the CDFW. This evaluation was completed using data acquired from current and historic imagery, hydrologic databases, analytic tools, and physical on the ground analyses/measurements by subject matter experts. Historic and current aerial photography of the Project Site were reviewed, prior to and during the field assessments. Aerial photography was informative with deference to the state and function of land resources in both the present, and historic context. As, inundation and vegetative signatures on aerial images can imply the presence - or absence, of waters, or a stream system within a discrete location.

The U.S. Environmental Protection Agency (EPA) WATERS GeoViewer tool also provided access to spatial data sets - such as interactive Upstream/Downstream search capabilities, and interactive Watershed Delineation, to assist in determining the jurisdictional status of resources detected within the region (epa.maps.arcgis.com/apps/webappviewer). Additionally, the Federal Emergency Management Agency (FEMA) flood zone was reviewed, in addition to the National Wetland Inventory (NWI) – which is maintained by the U.S. Fish and Wildlife Service (USFWS). This was done to support with the identification of potential aquatic resources within the Project Site.

To that end, the Project Site was assessed for the presence of federal jurisdictional Waters of the United State (WoUS), pursuant to the regulations and regulatory guidance outlined within the existing "2023 WoUS Rule," implemented in March 2023; and followed the guidance in the Corps of Engineers Wetland Delineation Manual (Environmental Laboratory 1987), and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, Version 2.0 (USACE 2008). Furthermore, the ordinary high-water mark (OHWM) of potential other WoUS were evaluated in the field following the guidance in A Field Guide to the Identification of the Ordinary High-Water Mark in the Arid West Region in the Western United States (USACE 2008).

Additionally, the Project Site was evaluated for the presence of lakes, rivers, or streambeds subject to regulation under Section 1600 (et seq.) of the California Fish and Game Code (FGC). CDFW has provided information and practical guidance for consistent and uniform administration of Section 1600 (et seq.) of the CFG Code within A Field Guide to Lake and Streambed Alteration Agreements Sections 1600-1607 (ESD-CDFG 1994). While there is no definition for the term lake in the CFG Code or associated regulations, the term stream, which includes creeks and rivers, is defined within Title 14, California Code of Regulations (CCR), Section 1.72:

> "A stream is a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation."

This evaluation was completed using the regulations, manuals, and guidance documentation created to identify features regulated under the aforementioned CFG Code Sections.

The methods used to determine any riparian/riverine or vernal pool areas were based on the above techniques as well as soils evaluations and vegetation classifications. This is because an area may be characterized as riparian based on its vegetative composition, but not meet the criteria of being federal or state jurisdictional water.

5.1.2 Existing Conditions and Results

According to the USGS and the USFWS National Wetland Inventory: there are no current or historical drainages on, or adjacent to, or even near the Project Site. There was also no evidence of current or historical drainages / water conveyance features observed during the field evaluations of the study area in 2022 and 2023 (Figure10). No hydric vegetation, signs of surface flow, and/or wetland hydrology were present in, adjacent to, or near any portion of the Project Site. Therefore, no riparian/riverine areas occur within Project limits. Furthermore, there are no features within the Project Site that have a surface connection to Montgomery Creek. It is also notable, that both EPA WATERS GeoViewer results, National Wetland Inventory and USGS 7.5 Quadrangle Map evidence no stream channels within the Project Site. Additionally, soil types mapped within the Project Site are well drained, and none have a hydric soil rating.

5.1.3 Impacts

There is no impact to riparian/riverine resources because no evidence of any soils, plants or other features that meet the definition of 6.1.2 of the MSHCP were visible within the Project Site.

5.1.4 Mitigation

There is no mitigation for riparian/riverine resources because there is no impact to riparian/riverine resources within the Project Site.

5.2 Vernal Pools

Vernal pools are seasonally inundated, ponded areas that only form in regions where specialized soil and climatic conditions exist. During fall and winter rains typical of Mediterranean climates, water collects in shallow depressions where downward percolation of water is prevented by the presence of a hard pan or clay pan layer (duripan) below the soil surface. Later in the spring when rains decrease and the weather warms, the water evaporates, and the pools generally disappear by May. The shallow depressions remain relatively dry until late fall and early winter with the advent of greater precipitation and cooler temperatures.

Vernal pools provide unusual "flood and drought" habitat conditions to which certain plant and wildlife species have specifically adapted - as well as, invertebrate species such as fairy shrimp. One of the factors for determining the suitability of the habitat for fairy shrimp would be demonstrable evidence of seasonal ponding in an area of topographic depression that is not subject to flowing waters. These astatic pools are typically characterized as vernal pools. More specifically, vernal pools are seasonal wetlands that occur in depression areas without a continual source of water. They have wetland indicators of all 3 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.

The determination that an area exhibits vernal pool characteristics and the definition of the watershed supporting vernal pool hydrology is made on a case-by-case basis. Such determinations consider the length of time the area exhibits upland and wetland characteristics, and the way the area fits into the overall ecological system as a wetland. The seasonal hydrology of vernal pools provides for a unique environment, which supports plants and invertebrates specifically adapted to a regime of winter inundation, followed by an extended period when the pool soils are dry. The MSHCP lists two general classes of soils known to be associated with special-status plant species; clay soils and Traver-Domino Willow association soils. Without the appropriate soils to create the impermeable restrictive layer, none of the special-status species associated with vernal pools can occur.

5.2.1 Methods

Methods included a review of recent and historic aerial photographs (2000-2022) of the Project Site and its immediate vicinity, a review of soils data, and 100 percent visual coverage pedestrian evaluation of the study area. The team looked for signs of clayey soils, ponding, cracking, mottling, etc.

5.2.2 Existing Conditions and Results

A review of recent and historic aerial photographs of the Project Site and its immediate vicinity did not provide visual evidence of an astatic or vernal pool conditions – on, or in the vicinity of the Project Site. Two soil types occur within the Project Site based on U.S. Department of Agriculture, Natural Resources Conservation Service (USDA-NRCS) Soil Survey data sets (Figure 7):

- Ramona sandy loam, 2 to 5 percent slopes; and
- Greenfield sandy loam, 2 to 8 percent slopes,

Of the above referenced soil types, none are the appropriate soils to support vernal pools, nor are they known to support seasonal wetlands, or special status invertebrates in Western Riverside County. No ponding was observed within the Project Site and the hydrologic regime associated with it does not support vernal pools, or astatic ponds. From the review of historic aerial photographs and observations during the field investigations, it is concluded no vernal pools or suitable fairy shrimp habitat occur within the Project's permanent disturbance footprint. Further, no special status plant species associated with vernal pools were observed during the field visits either.

5.2.3 Impacts

There are no impacts to vernal pools because none occur within the Project Site, and the soil types within the it do not support the potential for vernal pools.

5.2.4 Mitigation

No mitigation is required because no vernal pools exist within the Project Site.

5.3 Fairy Shrimp

Fairy shrimp can be found in non-vernal pool features such as stock ponds, ephemeral pools, road ruts, human-made depressions, or other depressions that may pond water. No habitat features suitable for fairy shrimp exist within the Project Site. Therefore, evaluations for the presence of fairy shrimp were not warranted - or required. No further discussion on fairy shrimp is made in this report.

5.4 Riparian Birds

Riparian Birds covered under the MSHCP such as the Least Bell's vireo (*Vireo bellii pusillus*) [LBVI], Southwestern willow flycatcher (*Empidonax trallii extimus*) [SWWF] and Yellow-billed cuckoo (*Coccyzus americanus*) [YBCU] are found only in well-developed riparian habitat. No habitat features suitable for any riparian birds exist within the Project Site. Therefore, evaluations for the presence of riparian birds were not warranted - or required. No further discussion on riparian birds is made in this report.

6 PROTECTION OF NARROW ENDEMIC PLANT SPECIES (SECTION 6.1.3)

The Project lies within a predetermined survey area for the following MSHCP Narrow Endemic Plant Species:

- Marvin's onion (*Allium marvinii*); and
- Many-stemmed dudleya (*Dudleya multicaulis*).

6.1.1 Methods

Field surveys for MSHCP narrow endemic plant species methods were derived from the standardized guidelines issued by the U.S. Fish and Wildlife Service (USFWS 2000), California Department of Fish and Wildlife (CDFW 2009) and the California Native Plant Society (CNPS 2001). As previously stated, the field surveys were specifically conducted to determine the presence/absence of MSHCP narrow endemic plant species, but the surveys were floristic in nature. Surveys were conducted during the appropriate blooming period for the MSHCP narrow endemic plant species.

6.1.2 Existing Conditions and Results

Habitat in the vicinity of the Project consists of developed/disturbed and ruderal land cover types. To that end, the results of the MSHCP narrow endemic plant species surveys imply that there are no special status plants present within the Project Site. Detailed field survey results are provided in Appendix F.

6.1.3 Impacts

No impacts can be identified, in that no MSHCP narrow endemic plant species were observed within the Project Site.

6.1.4 Mitigation

No mitigation is required because no MSHCP narrow endemic plant species exist within the Project Site.

7 ADDITIONAL SURVEY NEEDS AND PROCEDURES (SECTION 6.3.2)

The Project Site is not mapped in a Criteria Survey Area for plants, mammals or amphibians. It is however, mapped in a Criteria Survey Area for Burrowing Owl. Surveys must be conducted within suitable habitat for this species according to accepted protocols. Under the MSHCP, Burrowing Owl is considered an adequately conserved covered species that still requires focused surveys in certain areas as designated in Figure 6-4 of the MSHCP.

7.1 MSHCP Criteria Area Sensitive Plant Species

The Project is not within a predetermined survey area for MSHCP Criteria Area Plant Species. Therefore, no further discussion is made in this document with deference to MSHCP Criteria Area Plant Species.

7.2 Burrowing Owl

The Project Site is within a mapped survey area for Burrowing Owl, in accordance with MSHCP Figure 6-4, and a recent review of the RCA MSHCP Information GIS map. The Burrowing Owl is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing Owls use a wide variety of arid and semi-arid environments with level to gently sloping areas characterized by open vegetation and bare ground. The western Burrowing Owl, which occurs throughout the western United States including California, rarely digs its own burrows and is instead dependent upon the presence of burrowing mammals (i.e., California ground squirrels [*Otospermophilus beecheyi*], coyotes, and badgers [*Taxidea taxus*]) whose burrows are often used for roosting and nesting.

The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of Burrowing Owls. Where mammal burrows are scarce, Burrowing Owls have been found occupying manmade cavities, such as buried and non-functioning drainpipes, stand-pipes, and dry culverts. They also require low growth or open vegetation allowing line-of-sight observation of the surrounding habitat to forage and watch for predators. In California, the Burrowing Owl breeding season extends from the beginning of February through the end of August. Under the MSHCP, Burrowing Owl is considered an adequately conserved covered species that still requires focused surveys in certain areas as designated in Figure 6-4 of the MSHCP. The survey for Burrowing Owl requires a systematic survey of areas that provide suitable habitat - plus an approximately 500 feet zone of influence on all sides of suitable habitat, where applicable.

7.2.1 Methods

A Burrowing Owl habitat suitability assessment and burrow survey was conducted on November 30, 2022 in accordance with the March 29, 2006 Western Riverside County MSHCP Burrowing Owl survey instructions. Since suitable habitat was detected for Burrowing Owls within the study area, four (4) additional surveys were performed. Targeted owl surveys were conducted on 12

and 27 March and 05, 25 April 2023. Surveys were performed when weather conditions were conducive to observing owls outside of burrows

Natural and non-natural substrates were examined for potential burrow sites. Potential burrows encountered were examined for shape, size, molted feathers, whitewash, cast pellets and/or prey remains. Disturbance characteristics and other animal sign encountered within the study area were recorded. A hand-held, global positioning system (GPS) unit with sub meter accuracy was used to survey transects that were prepared within a Geographic Information System prior to the start of field surveys, to identify study area boundaries, and for other pertinent information. Representative photographs of the study area were taken, and recent aerial photographs were evaluated for Project Site and surrounding area. Detailed field survey methods are provided in Appendix E.

7.2.2 Existing Conditions and Results

Habitat in the vicinity of the Project consists of developed/disturbed and ruderal land cover types. No Burrowing Owls were detected nesting, foraging, or dispersing during pedestrian-based field surveys in 2022 and 2023. Numerous low quality potential burrows were observed within the study area. The burrows detected lacked any evidence of owl tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, nest burrow decoration materials, or other items. Detailed field survey results are provided in Appendix E. Burrowing Owls are absent from the Project Site

7.2.3 Impacts

No impacts can be identified, in that no Burrowing Owl or Burrowing Owl sign was observed within the Project Site.

7.2.4 Mitigation

To safeguard there will be no impact to Burrowing Owl, a pre-construction survey is warranted. The suggested mitigation is as follows:

> "Prior to issuance of a grading permit, a preconstruction survey shall be conducted within 30 days prior to ground disturbance to avoid direct take of Burrowing Owls. If the results of the survey indicate that no Burrowing Owls are present within the Project Site, then the project may move forward with grading, upon Planning Department approval. If Burrowing Owls are found to be present or nesting within the Project Site during the preconstruction survey, then the following recommendations must be adhered to: Exclusion and relocation activities may not occur during the breeding season, which is defined as March 1 through August 31, with the following exception: From March 1 through March 15 and from August 1 through August 31 exclusion and relocation activities may take place if it is proven to the Lead Agency and/or appropriate agencies (if any) that egg laying or chick rearing is not taking place. This determination must be made by a qualified biologist."

8 INFORMATION ON OTHER SPECIES

8.1 Delhi Sands Flower Loving Fly

The Project Site does not fall within the Delhi soils mapped within the MSHCP baseline data Figure 7).

8.2 Species Not Adequately Conserved

MSHCP Table 9-3 identifies 28 species where requirements must be met for those to be considered not adequately conserved. None of the species listed in the MSHCP Table 9-3 occur on or near the Project Site. Therefore, there is no further action required.

9 GUIDELINES PERTAINING TO THE URBAN/WILDLANDS INTERFACE (SECTION 6.1.4)

The MSHCP Section 6.1.4 Guidelines are intended to address indirect effects associated with locating development in proximity to MSHCP Conservation Areas, where applicable. The Project's permanent impact area is not in proximity to an established Cell Group, Criteria Cell, PQP Land, Linkage / Core, Conserved Land, or RCA Conservation Easement, therefore, the MSHCP guidelines pertaining to Urban/Wildlands Interface for the management of edge factors such as lighting, urban runoff, toxics, and domestic predators do not apply.

10 BEST MANAGEMENT PRACTICES (VOLUME I, APPENDIX C)

This section of the report is designed to describe and comment as to the necessity of implementation of the BMPs identified in Volume 1, Appendix C. The BMPs and their applicability to the Project is identified in Table 2.

Table 2. MSHCP Best Management Practices Applicability (Volume 1, Appendix C)

BMP	Applicable Yes or No	Comment
No. 1 – A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for Project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the Project, and the access routes to and Project boundaries within which the Project activities must be accomplished.	Not Applicable	There are no special status species within, or near the Project Site

BMP	Applicable Yes or No	Comment
No. 2 – Water pollution and erosion control plans shall be developed and implemented in accordance with RWQCB requirements.	Yes	The Project will include grading and paving.
No. 3 – The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via preexisting access routes to the greatest extent possible.	Yes	The Project Site is < 14.7-acres, and is accessible from West Lincoln Street.
No. 4 – The upstream and downstream limits of Projects disturbance plus lateral limits of disturbance on either side of the stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work.	Not Applicable	There are no streambed resources on, or near the Project Site
No. 5 – Project should be designed to avoid the placement of equipment and personnel within the stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern.	Not Applicable	There are no streambed Resources, on or near the Project Site
No. 6 – Projects that cannot be conducted without placing equipment or personnel in sensitive habitats should be timed to avoid the breeding season of riparian identified in MSHCP Global Species Objective No. 7.	Not Applicable	There are no sensitive habitat, riparian or streambed resources on, or near the Project Site
No. 7 – When stream flows must be diverted, the diversions shall be conducted using sandbags or other methods requiring minimal instream impacts. Silt fencing of other sediment trapping materials shall be installed at the downstream end of construction activity to minimize the transport of sediments offsite. Settling ponds where sediment is collected shall be cleaned out in a manner that prevents the sediment from reentering the stream. Care shall be exercised when removing silt fences, as feasible, to prevent debris or sediment from returning to the stream.	Not Applicable	There are no streambed resources on, or near the Project Site
No. 8 – Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be in such a manner as	Not Applicable	There are no sensitive habitat, riparian or streambed resources on, or near the Project Site

BMP	Applicable Yes or No	Comment
to prevent any runoff from entering sensitive habitat. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials shall be reported to appropriate entities including but not limited to applicable jurisdictional city, FWS, and CDFG, RWQCB and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.		
No. 9 – Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.	Not Applicable	There are no water courses, streambed resources on, or near the Project Site
No. 10 – The qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the Project Site	No (But available as needed)	The Project Site consists of Developed/Disturbed and Ruderal land cover types.
No. 11 – The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species.	No	Project includes no temporary impacts, and the Project Site consists of Developed/Disturbed and Ruderal land cover types.
No. 12 – Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible.	Yes	The Project Site will remove Developed/Disturbed and Ruderal land cover types from Riverside County.
No. 13 – To avoid attracting predators of the species of concern, the Project Site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).	Yes	Standard Measure
No. 14 – Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed Project Site and designated staging areas and routes of	Yes	Standard Measure

BMP	Applicable Yes or No	Comment
travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.		
No. 15 – The Permittee shall have the right to access and inspect any sites of approved projects including any restoration/ enhancement area for compliance with project approval conditions including these BMPs.	Yes	Standard Measure

11 CERTIFICATION

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

DATE: July 24, 2023

SIGNED: _____

12 REFERENCES

Baldwin, J., D. Goldman, D. Keil, R. Patterson, and T. Rosatti. 2012. The Jepson Manual: Higher Plants of California. Berkeley: University of California Press.

Burt, W. H. and R. P. Grossenheider. 1980. A Field Guide to Mammals: North America; North of Mexico. New York, NY: Houghton Mifflin Company.

CDFW (California Department of Fish and Wildlife). 2023. RareFind. California Department of Fish and Game, Natural Diversity Database (CNDDB). Sacramento, CA: California Department of Fish and Game, Biogeographic Data Branch.

CNPS (California Native Plant Society). 2023. CNPS Electronic Inventory of Rare and Endangered Plants: CNPS.

Dudek. 2003. Final Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Riverside, CA: County of Riverside.

Geographic Information Services Database (GISD). 2022. Transportation and Land Management Agency Geographic Information Services Database.

Elbroch, M. 2003. Mammal Tracks & Sign, A Guide to North American Species. Mechanicsburg, PA: Stackpole Books.

Halfpenny, J.C. 2000. Scats and Tracks of the Desert Southwest, A Field Guide to the Signs of 70 Wildlife Species. Helena, MT: Falcon Publishing, Inc.

Holland, R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California (California Department of Fish and Game, The Resources Agency, ed), p. 156. Sacramento, CA.

Microsoft Corporation. 2023. Bing Maps Aerial Imagery. Redmond, WA

RCA. 2023. Regional Conservation Authority GIS Data Mapping Tool (RCA 2023, https://www.wrc-rca.org/rcamaps/).

Sawyer, J., T. Keeler-Wolf, and J. Evens. 2009. A Manual of California Vegetation. Sacramento, CA: California Native Plant Society.

Sibley, D.A. 2000. National Audubon Society. The Sibley Guide to Birds. New York, NY: Alfred A. Knopf, Inc.

Stebbins, R.C. 2003. A Field Guide to Western Reptiles and Amphibians. New York, NY: Houghton Mifflin.

USGS (United States Geological Service). 1984 7.5-Minute Quadrangle Beaumont, California.

USFWS (United States Fish and Wildlife Service). 2023a. Critical Habitat Portal. USFWS

USFWS (United States Fish and Wildlife Service). 2023b. Los Angeles County Fish and Wildlife Office. Endangered and Threatened Species List. In: U.S. Department of the Interior, editor. San Bernardino, CA: USFWS.

FIGURES

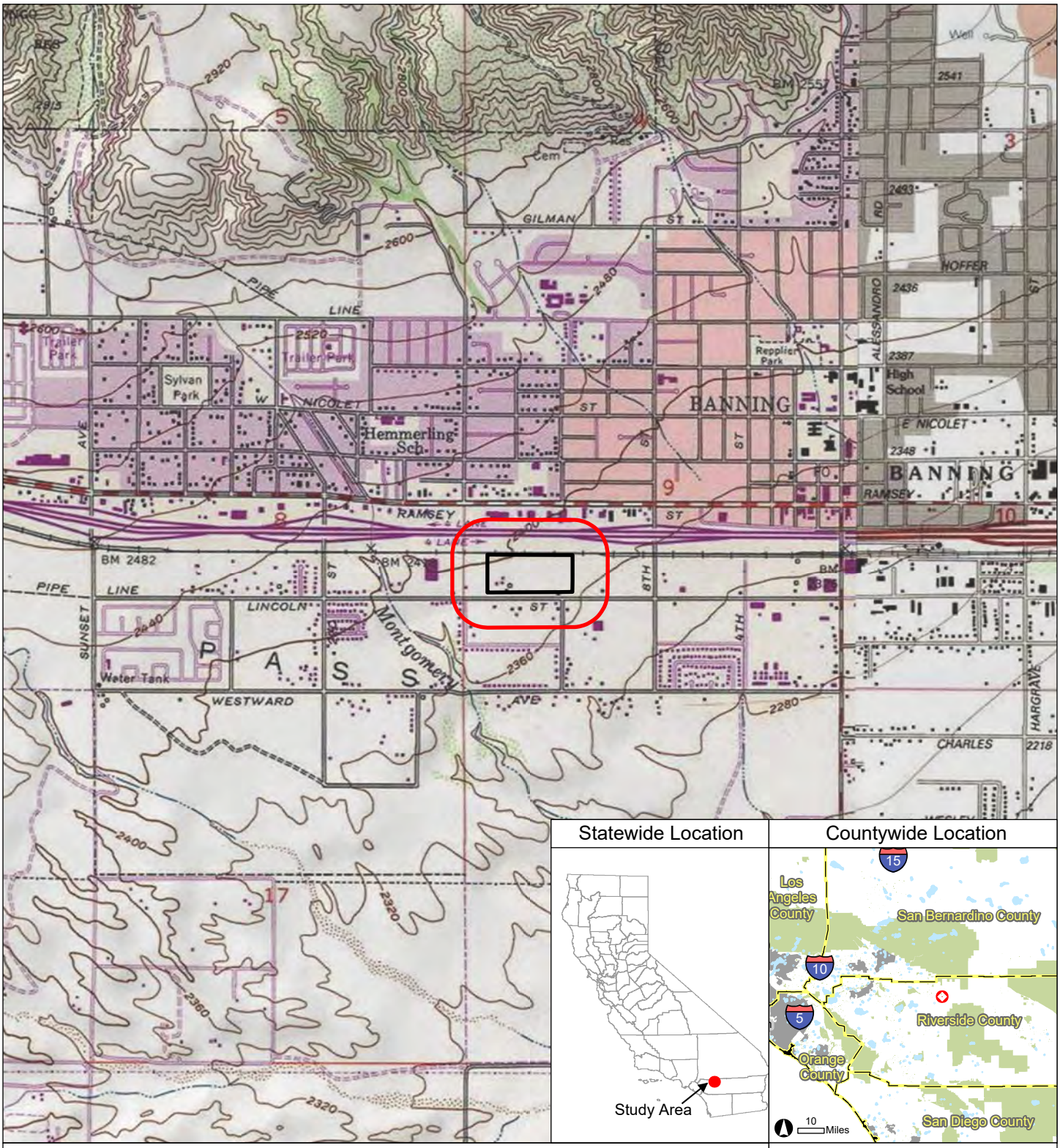


Figure 1. Regional Location

Project Site (14.77 acres)

Study Area (72.77 acres)

0 200 400 Feet

1 inch = 400 feet

Data Sources:
- ESRI World Imagery 6/9/2020

Map Prepared: 4-19-23

Prepared by:

NOREAS
Environmental Engineering and Science

Figure 2. Site Vicinity

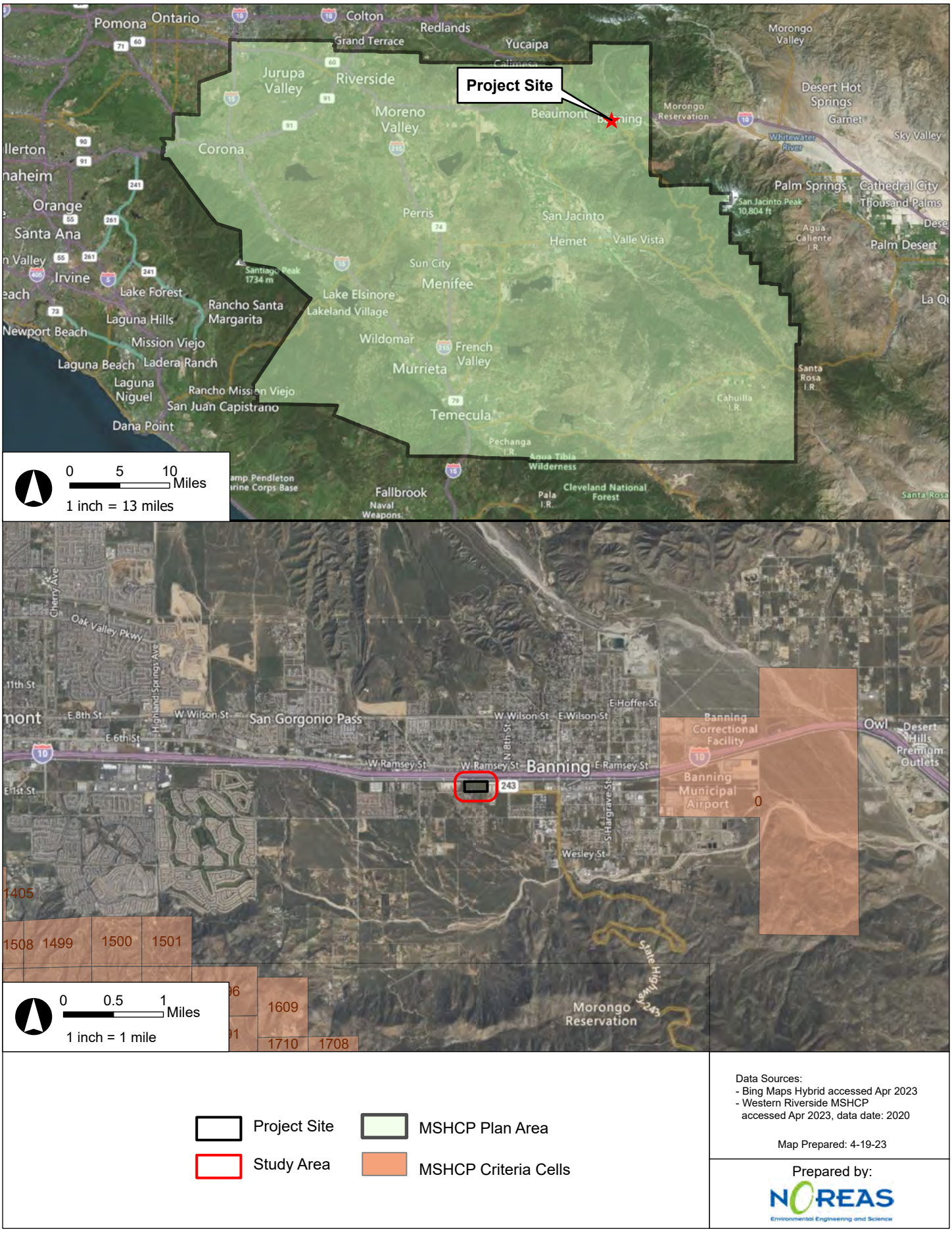


Figure 3. MSHCP Criteria Cells

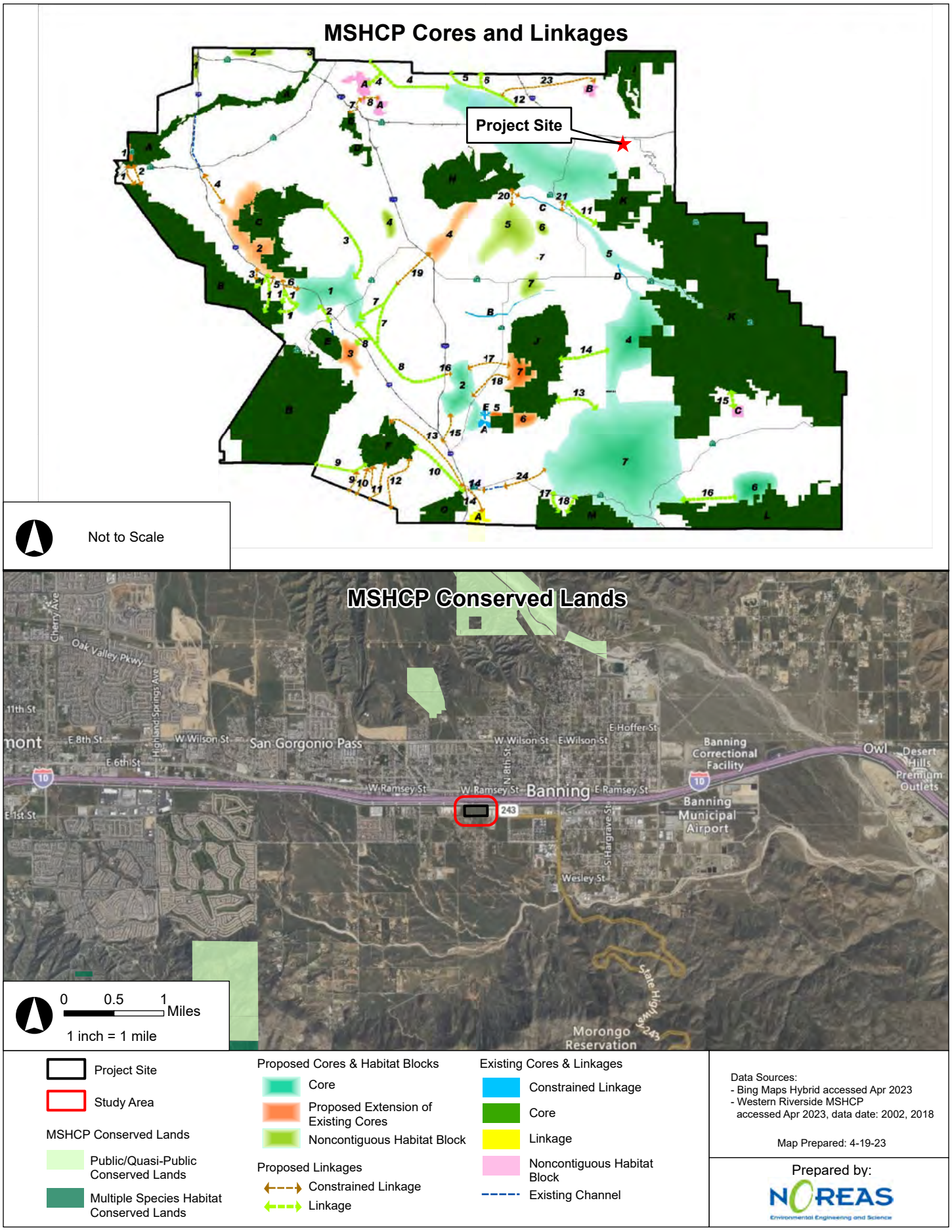


Figure 4. Cores, Linkages, and Conserved Lands

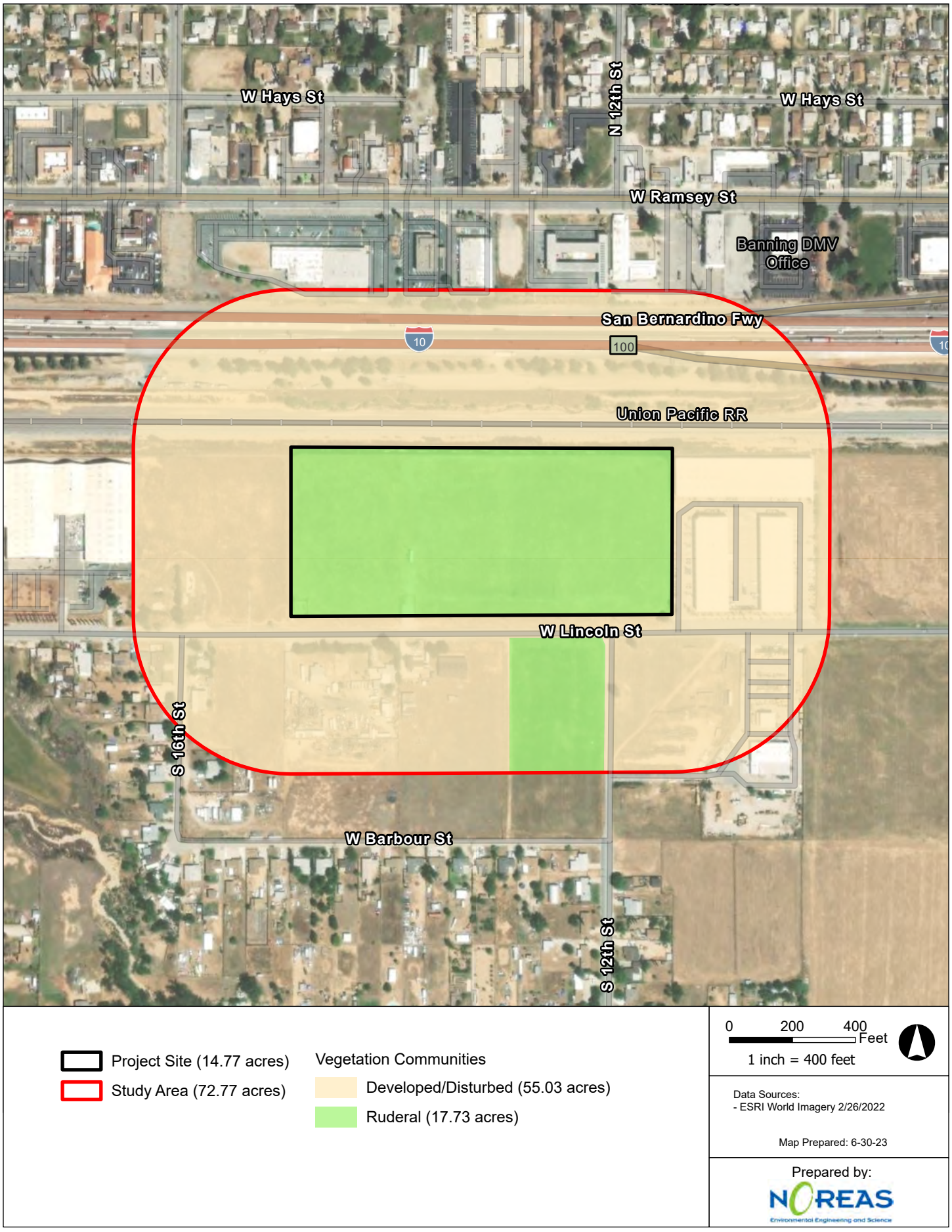
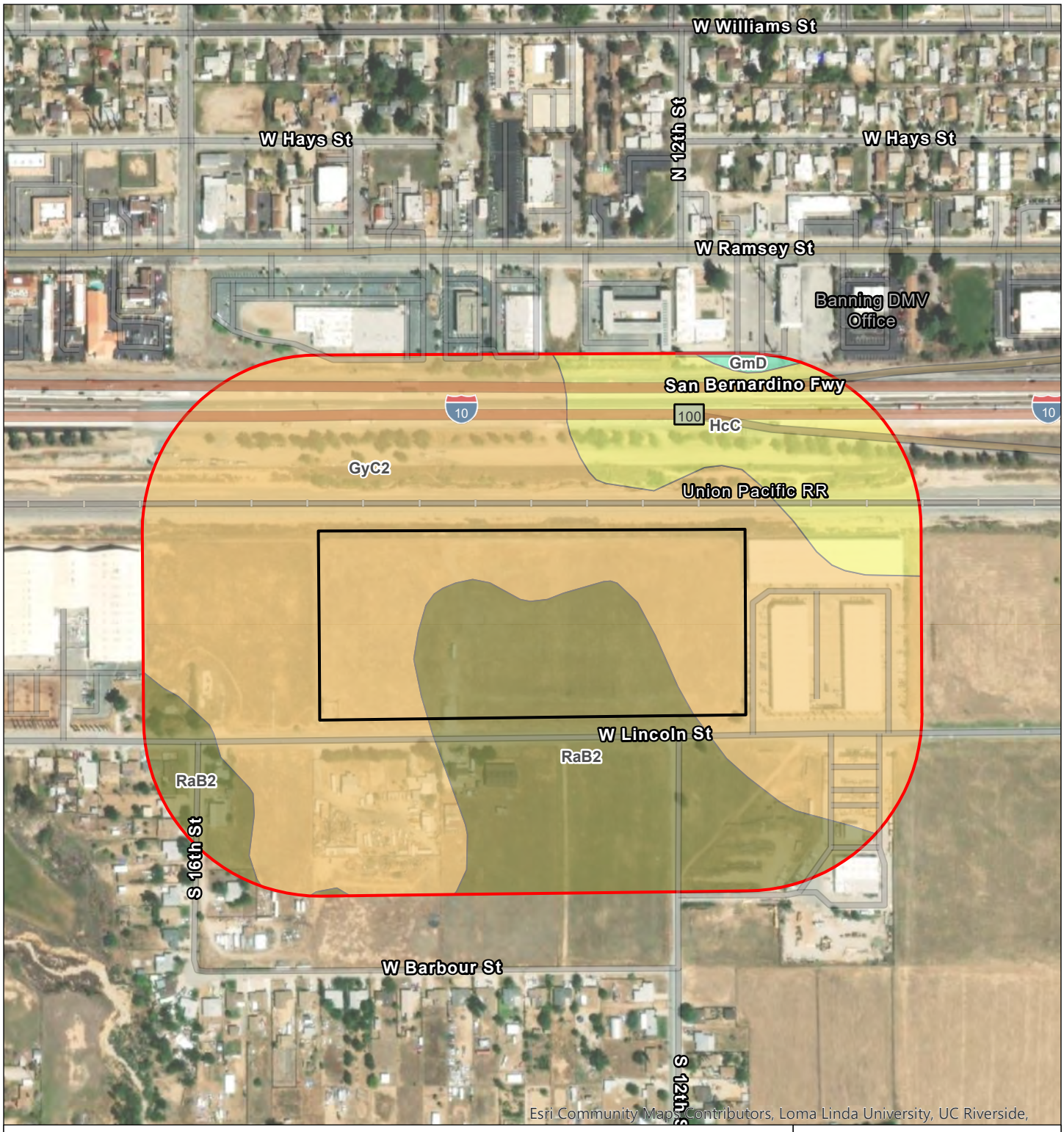


Figure 5. Vegetation Communities and Land Cover Types

Figure 6. RCA MSHCP Vegetation 2012



Project Site

Study Area

Soil Types

- GmD - Gorgonio gravelly loamy fine sand, 2 to 15 percent slopes
- GyC2 - Greenfield sandy loam, 2 to 8 percent slopes, eroded
- HcC - Hanford coarse sandy loam, 2 to 8 percent slopes
- RaB2 - Ramona sandy loam, 2 to 5 percent slopes, eroded

0 200 400 Feet

1 inch = 400 feet

Data Sources:
- ESRI World Imagery 6/9/2020
- NRCS Web Soil Survey accessed Apr 2023

Map Prepared: 4-19-23

Prepared by:

NOREAS
Environmental Engineering and Science

Figure 7. Soils Map

Special-Status Species Occurrences

Map Code	Common Name *(Scientific Name)*
Plants	
P1	California satintail — *Imperata brevifolia*
P2	chaparral sand-verbena — *Abronia villosa var. aurita*
P3	Coachella Valley milk-vetch — *Astragalus lentiginosus var. coachellae*
P4	Coulter's goldfields — *Lasthenia glabrata ssp. coulteri*
P5	Desert Fan Palm Oasis Woodland — *Desert Fan Palm Oasis Woodland*
P6	Horn's milk-vetch — *Astragalus hornii var. hornii*
P7	Jaeger's milk-vetch — *Astragalus pachypus var. jaegeri*
P8	Laguna Mountains jewelflower — *Streptanthus bernardinus*
P9	Latimer's woodland-gilia — *Saltugilia latimeri*
P10	mesa horkelia — *Horkelia cuneata var. puberula*
P11	Mojave tarplant — *Deinandra mohavensis*
P12	mud nama — *Nama stenocarpa*
P13	narrow-leaf sandpaper-plant — *Petalonyx linearis*
P14	Palmer's mariposa-lily — *Calochortus palmeri var. palmeri*
P15	Parish's alumroot — *Heuchera parishii*
P16	Parry's spineflower — *Chorizanthe parryi var. parryi*
P17	Payson's jewelflower — *Caulanthus simulans*
P18	Plummer's mariposa-lily — *Calochortus plummerae*
P19	salt spring checkerbloom — *Sidalcea neomexicana*
P20	San Bernardino aster — *Symphyotrichum defoliatum*
P21	San Bernardino gilia — *Gilia leptantha ssp. leptantha*
P22	San Felipe monardella — *Monardella nana ssp. leptosiphon*
P23	San Jacinto Valley crownscale — *Atriplex coronata var. notatior*
P24	Santa Ana River woollystar — *Eriastrum densifolium ssp. sanctorum*
P25	smooth tarplant — *Centromadia pungens ssp. laevis*
P26	Southern Coast Live Oak Riparian Forest — *Southern Coast Live Oak Riparian Forest*
P27	Southern Cottonwood Willow Riparian Forest — *Southern Cottonwood Willow Riparian Forest*
P28	Southern Mixed Riparian Forest — *Southern Mixed Riparian Forest*
P29	spiny-hair blazing star — *Mentzelia tricuspis*
P30	white-bracted spineflower — *Chorizanthe xanti var. leucotheca*
P31	white rabbit-tobacco — *Pseudognaphalium leucocephalum*
P32	Yucaipa onion — *Allium marvinii*
Invertebrates	
I1	Coachella Valley jerusalem cricket — *Stenopelmatus cahuilaensis*
I2	Crotch bumble bee — *Bombus crotchii*
I3	Dohrn's elegant eucnemid beetle — *Palaeoxenus dohrni*
Mammals	
M1	American badger — *Taxidea taxus*
M2	Dulzura pocket mouse — *Chaetodipus californicus femoralis*
M3	Los Angeles pocket mouse — *Perognathus longimembris brevinasus*
M4	northwestern San Diego pocket mouse — *Chaetodipus fallax fallax*
M5	pallid bat — *Antrozous pallidus*
M6	pallid San Diego pocket mouse — *Chaetodipus fallax pallidus*
M7	Palm Springs pocket mouse — *Perognathus longimembris bangsi*
M8	Palm Springs round-tailed ground squirrel — *Xerospermophilus tereticaudus chlorus*
M9	San Bernardino kangaroo rat — *Dipodomys merriami parvus*
M10	San Diego black-tailed jackrabbit — *Lepus californicus bennettii*
M11	San Diego desert woodrat — *Neotoma lepida intermedia*
M12	southern grasshopper mouse — *Onychomys torridus ramona*
M13	Stephens' kangaroo rat — *Dipodomys stephensi*
M14	Townsend's big-eared bat — *Corynorhinus townsendii*
M15	western yellow bat — *Lasiurus xanthinus*
Birds	
B1	burrowing owl — *Athene cunicularia*
B2	California horned lark — *Eremophila alpestris actia*
B3	coastal cactus wren — *Campylorhynchus brunneicapillus sandiegensis*
B4	coastal California gnatcatcher — *Polioptila californica californica*
B5	Cooper's hawk — *Accipiter cooperii*
B6	ferruginous hawk — *Buteo regalis*
B7	golden eagle — *Aquila chrysaetos*
B8	Le Conte's thrasher — *Toxostoma lecontei*
B9	least Bell's vireo — *Vireo bellii pusillus*
B10	loggerhead shrike — *Lanius ludovicianus*
B11	prairie falcon — *Falco mexicanus*
B12	purple martin — *Progne subis*
B13	southern California rufous-crowned sparrow — *Aimophila ruficeps canescens*
B14	southwestern willow flycatcher — *Empidonax traillii extimus*
B15	tricolored blackbird — *Agelaius tricolor*
B16	western yellow-billed cuckoo — *Coccyzus americanus occidentalis*
B17	white-tailed kite — *Elanus leucurus*
B18	yellow warbler — *Setophaga petechia*
Reptiles	
R1	California glossy snake — *Arizona elegans occidentalis*
R2	Coachella Valley fringe-toed lizard — *Uma inornata*
R3	coast horned lizard — *Phrynosoma blainvillii*
R4	coastal whiptail — *Aspidoscelis tigris stejnegeri*
R5	orange-throated whiptail — *Aspidoscelis hyperythra*
R6	red-diamond rattlesnake — *Crotalus ruber*
R7	Southern California legless lizard — *Anniella stebbinsi*
R8	southern rubber boa — *Charina umbratica*
Amphibians	
A1	southern mountain yellow-legged frog — *Rana muscosa*
A2	western spadefoot — *Spea hammondii*

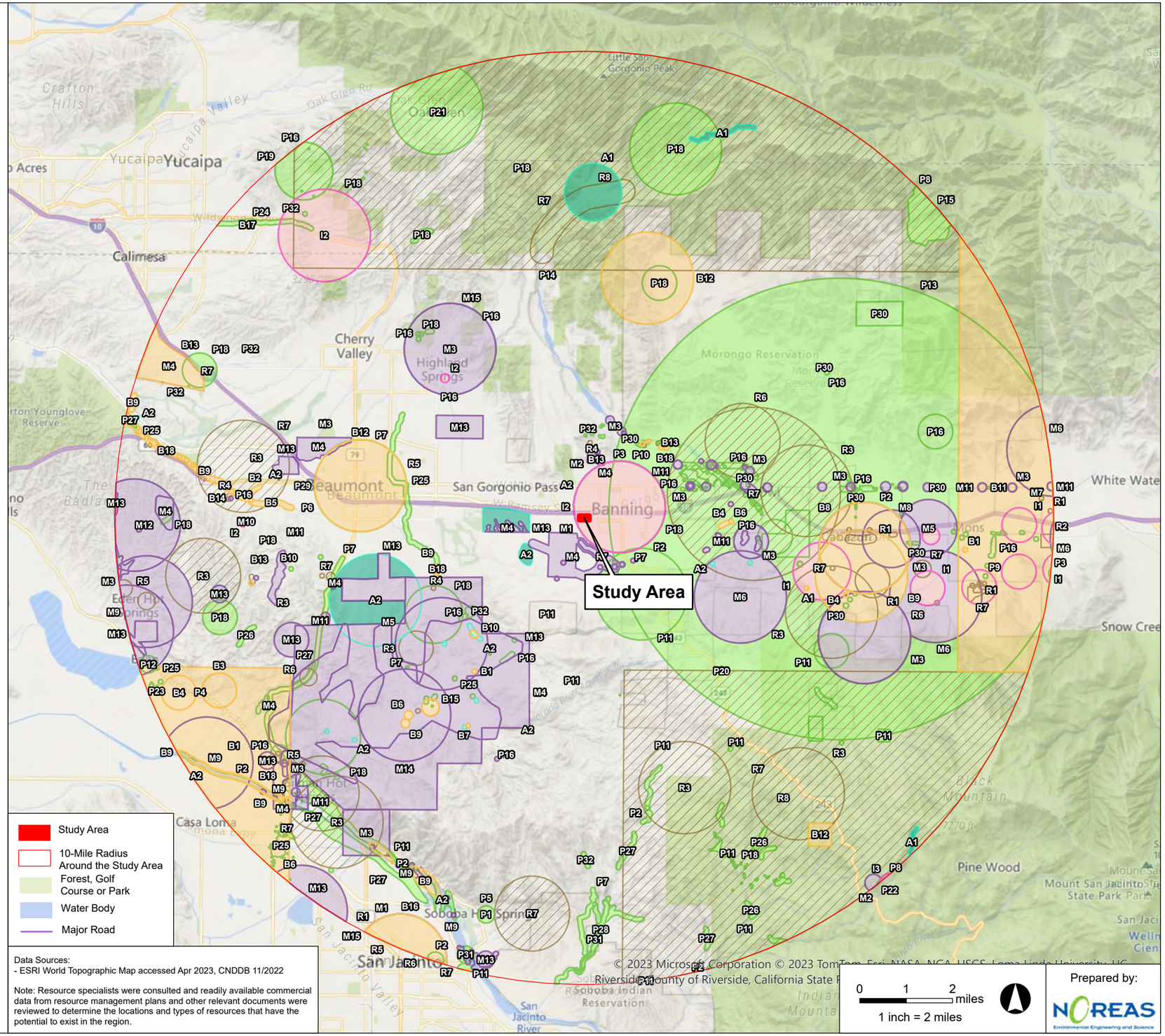


Figure 8. Literature Review

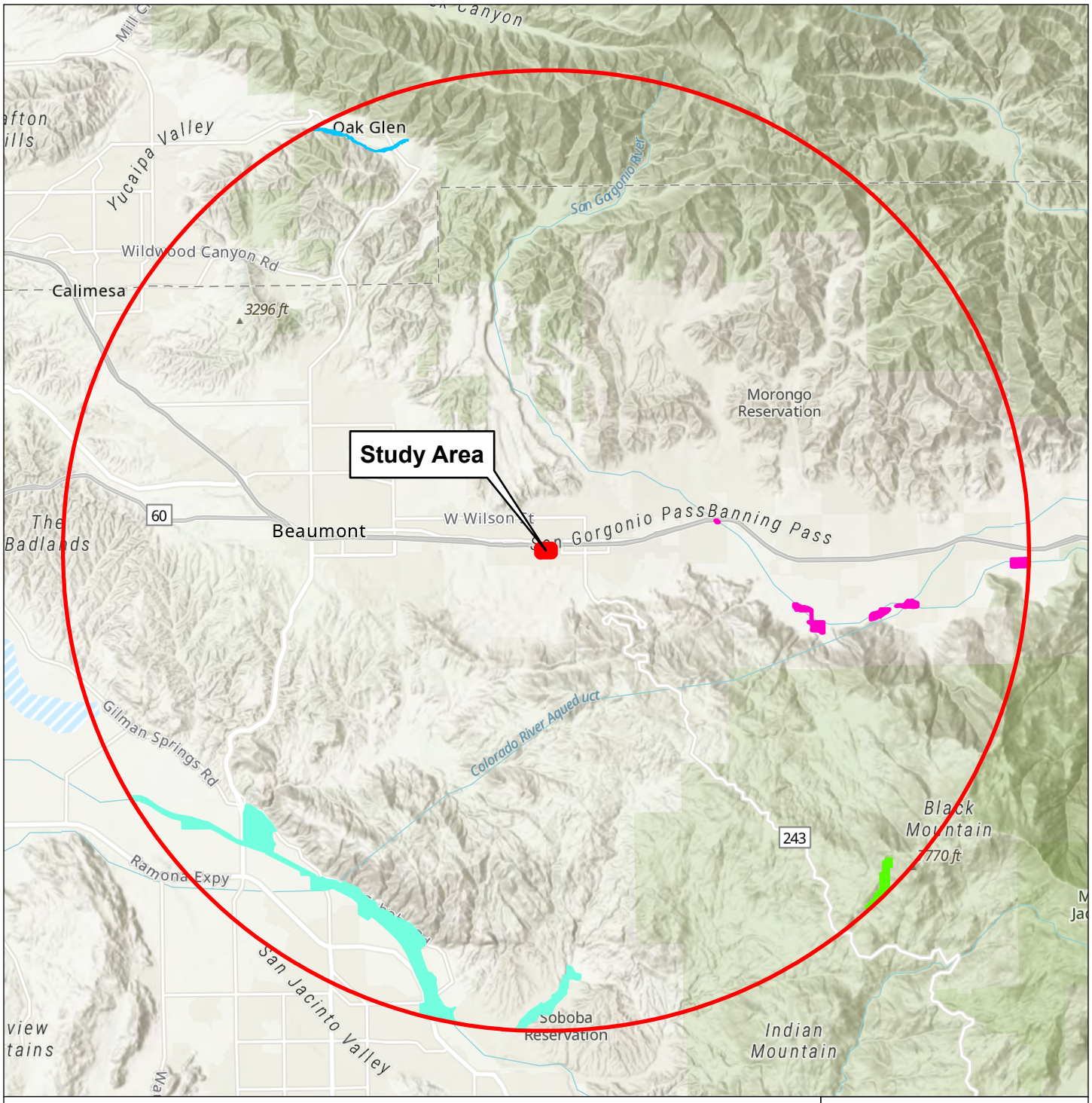


Figure 9. Critical Habitat

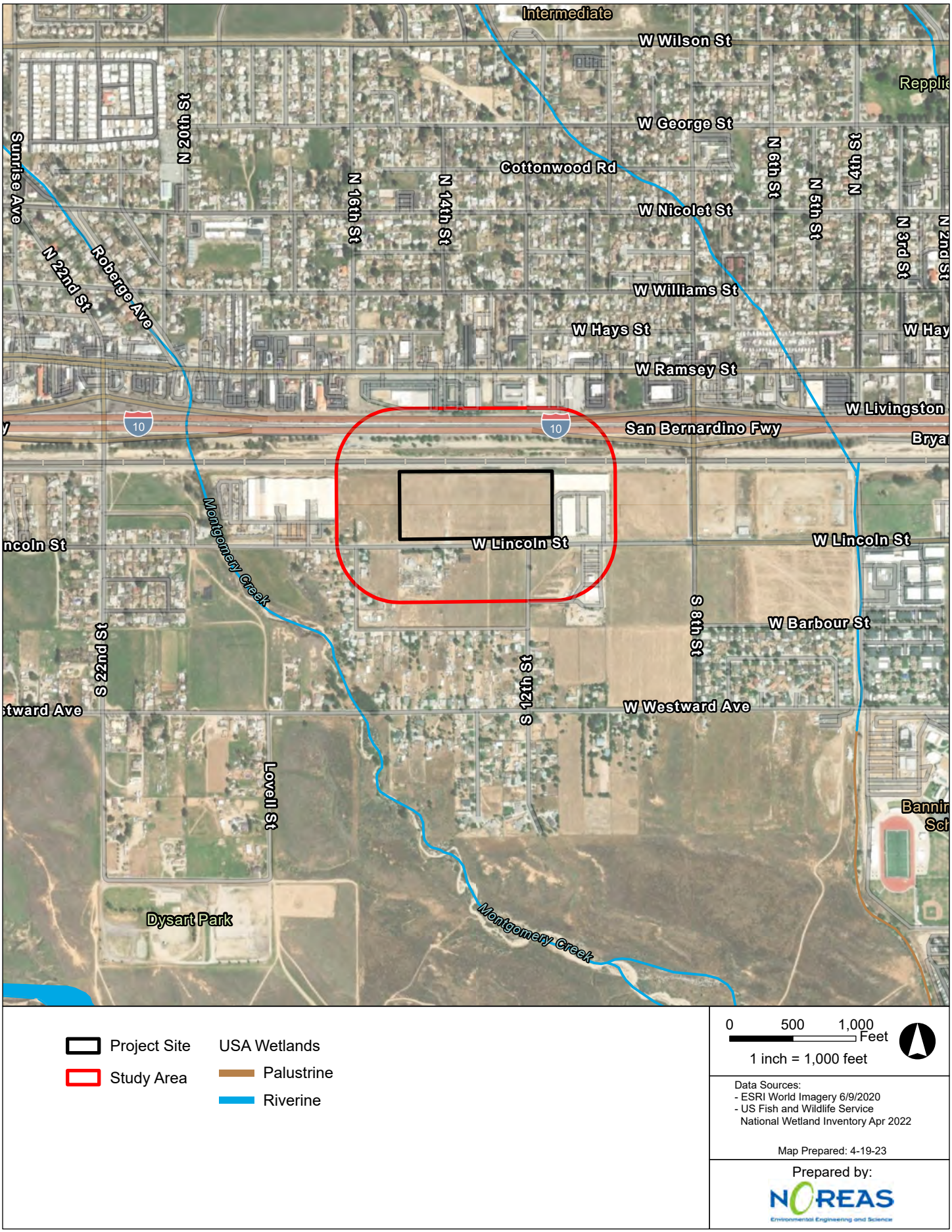


Figure 10. National Wetland Inventory

APPENDICES

Appendix A Site Plan

CONCEPTUAL SITEPLAN

BROWN STRAUSS STEEL / BANNING CALIFORNIA

1210 & 1431 WEST LINCOLN STREET

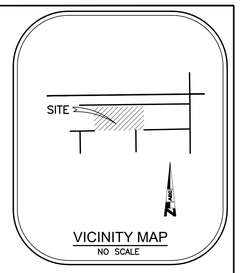
LEGEND

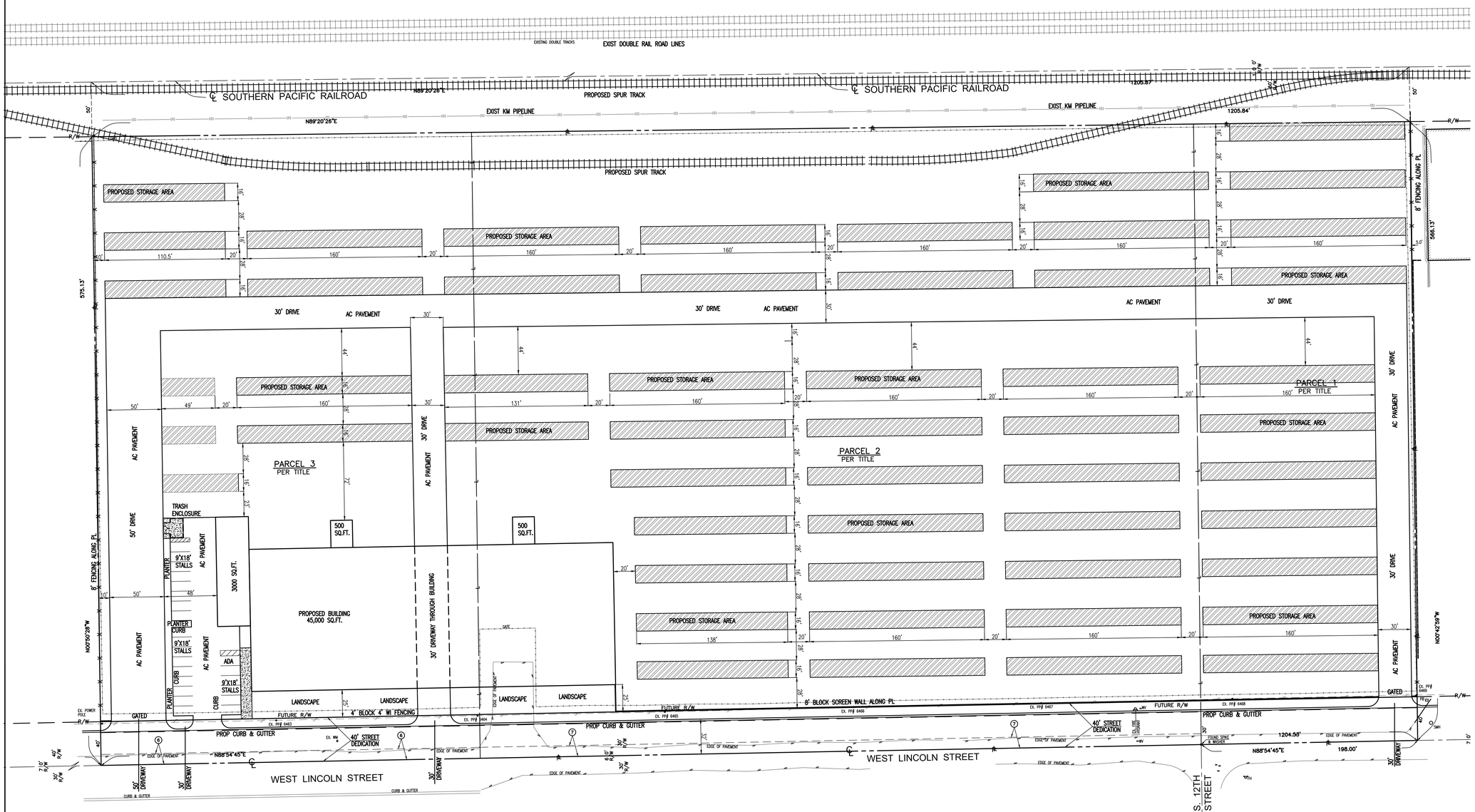
FIRE HYDRANT	AC	—	ASPHALT PAVEMENT
EDGE PAVEMENT	EG	—	EDGE OF GUTTER
WATER VALVE	EP	—	EDGE OF PAVEMENT
METER, PULL BOX	FC	—	FINISHED CONCRETE
SIGN	FL	—	FLOW LINE
CONCRETE	FH	—	FIRE HYDRANT
BLOCK WALL	GM	—	GAS METER
LIGHT STANDARD	GP	—	GUARD POST
TRAFFIC SIGNAL	L	—	LOT LINE
STREET LIGHT	NG	—	NATURAL GROUND
WROUGHT IRON FENCE	PB	—	PULL BOX
WOOD FENCE	PL	—	PROPERTY LINE
EX. CHAINLINK FENCE	EX. PP	—	POWER POLE
	R/W	—	RIGHT OF WAY
	SMH	—	SEWER MANHOLE
	TC	—	TOP OF CURB
	EX. WM	—	WATER METER
	WV	—	WATER VALVE

GRAPHIC SCALE

40 30 20 10 0 20 40 80 120

(IN FEET)
1 INCH = 40 FT.





LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED BANNING IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL 1:

THE WESTERLY 198.00 FEET OF BLOCK 273 OF LANDS OF THE BANNING LAND COMPANY, IN THE CITY OF BANNING, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 9, PAGE 44 OF MAPS, SAN BERNARDINO COUNTY RECORDS.

EXCEPT THAT PORTION IN THE RIGHT OF WAY OF THE SOUTHERN PACIFIC RAILROAD COMPANY, ACQUIRED BY UNITED STATES CONGRESSIONAL GRANT.

PARCEL 2:

BLOCK 274 OF LANDS OF THE BANNING LAND COMPANY, IN THE CITY OF BANNING, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 9, PAGE 44 OF MAPS, SAN BERNARDINO COUNTY RECORDS.

EXCEPT THAT PORTION IN THE RIGHT OF WAY OF THE SOUTHERN PACIFIC RAILROAD COMPANY, ACQUIRED BY UNITED STATES CONGRESSIONAL GRANT.

PARCEL 3:

THE EAST ONE-HALF LOT OF 285 IN BANNING, AS SHOWN BY A CERTAIN MAP ENTITLED 'AMENDED MAP OF BANNING LAND CO., AS PER MAP RECORDED IN BOOK 9, PAGE 44 OF MAPS, RECORDS OF SAN BERNARDINO, CALIFORNIA.

EXCEPTING THEREFROM THAT PORTION IN THE RIGHT OF WAY ACQUIRED BY THE UNITED STATES CONGRESSIONAL GRANT.

APN: 540-180-020, 540-180-022, AND 540-180-026

BROWN STRAUSS STEEL

LOT SIZE: 15.3787 AC / 687,683 SF
EXISTING IMPERVIOUS AREA: 0 SF
PROPOSED USE: BROWN STRAUSS STEEL
PROPOSED BUILDINGS: 44,00 SF
PROPOSED PAVEMENT:
PROPOSED STEEL STORAGE:
TOTAL SITE IMPREVIOUS:
OPEN SPACE:
TOTAL SITE
STORM WATER TREATMENT:

BASIS OF BEARINGS

THE BASIS OF BEARINGS USED ON THIS SURVEY IS THE CENTERLINE OF WEST LINCOLN STREET BEARING NORTH 88°54'45" EAST AS SHOWN ON RECORD OF SURVEY BOOK 122 PAGE 60 RECORDS OF SAID COUNTY.

GENERAL NOTES

1. SURVEYOR HAS RELIED UPON INFORMATION SUPPLIED IN THE CURRENT TITLE REPORT BY FIDELITY NATIONAL TITLE COMPANY REPORT NO. 011-30090448-BAM DATED JULY 26, 2022 TO DISCLOSE RECORD EASEMENTS THAT BURDEN OR BENEFIT THIS PROPERTY.
2. ASSESSORS PARCEL NUMBERS FOR THIS PROPERTY ARE 540-180-020, 540-180-022 AND 540-180-026.
3. THE SURVEYED PROPERTY IS A VACANT LOT. THERE WERE ZERO (0) EXISTING BUILDINGS AT TIME OF FIELD SURVEY.
4. THIS PLAN AND/OR DATA FILES INCLUDING ALL CONTENTS HEREIN ARE FOR THE SOLE USES AND PARTIES INDICATED HEREON INCLUDING THEIR SUCCESSORS AND ASSIGNS. ANY DEVIATION OR MISUSES OF THIS PLAN AND/OR DATA FILES WITHOUT PRIOR WRITTEN AGREEMENTS BY ANACAL ENGINEERING IS PROHIBITED AND IS THE RESPONSIBILITY OF THE PARTIES USING SAID DRAWING AND/OR DATA FILES, UPON THE REUSE OF THIS PLAN AND/OR DATA FILES ANACAL ENGINEERING RELINQUISHES ALL RESPONSIBILITIES OF THE ACCURACY AND GENERAL CONTENT OF SAID PLAN AND/OR DATA FILES CONTAINED HEREIN.

UTILITIES INFORMATION

ELECTRICITY
CITY OF BANNING
P.O. BOX 985
BANNING, CA 92220
(951) 922-3185

GAS
SOUTHERN CALIFORNIA GAS COMPANY
60 E. RAMSEY STREET
BANNING, CA 92220
(800) 427-2200

WASTE DISPOSAL
WASTE MANAGEMENT
(800) 423-9986

SEWER AND WATER SERVICES
CITY OF BANNING
P.O. BOX 985
BANNING, CA 92220
(951) 922-3185

THE EXISTENCE AND APPROXIMATE LOCATION OF UNDERGROUND UTILITIES OR STRUCTURES SHOWN ON THESE PLANS WERE DETERMINED BY A SEARCH OF THE AVAILABLE PUBLIC RECORDS AND ABOVE GROUND OBSERVANCE. THE SURVEYOR MAKES NO GUARANTEE THAT THE UNDERGROUND UTILITIES SHOWN COMPRISE ALL UTILITIES IN THE AREA, EITHER IN SERVICE OR ABANDONED. THE SURVEYOR FURTHER DOES NOT WARRANT THAT THE UNDERGROUND UTILITIES SHOWN ARE IN THE EXACT LOCATION INDICATED ALTHOUGH HE/SHE DOES CERTIFY THAT THEY ARE LOCATED AS ACCURATELY AS POSSIBLE FROM INFORMATION AVAILABLE. THE SURVEYOR HAS NOT PHYSICALLY LOCATED THE UNDERGROUND UTILITIES.

FLOOD ZONE INFORMATION

ZONE: 'X'
AREA OF MINIMAL FLOOD HAZARD

PANEL NO. 06065C 0817G

DATED: AUGUST 28, 2008

NO FIELD SURVEYING WAS PERFORMED TO DETERMINE THIS ZONE AND AN ELEVATION CERTIFICATE MAY BE NEEDED TO VERIFY THIS DETERMINATION OR AEX. PPLY FOR VARIANCE FROM THE FEDERAL EMERGENCY MANAGEMENT AGENCY.

EASEMENT NOTES

THE FOLLOWING ITEMS WERE FOUND IN TITLE REPORT NO. 011-30090448-BAM DATED JULY 26, 2022 BY FIDELITY NATIONAL TITLE COMPANY:

(3) COVENANTS, CONDITIONS, RESTRICTIONS AND EASEMENTS BUT OMITTING ANY COVENANTS OR RESTRICTIONS, AS SET FORTH IN THE DOCUMENT RECORDED IN BOOK 37, PAGE 234, DEEDS. THE EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD AND IS NOT PLOTTED HEREON.

(4) AN EASEMENT FOR INGRESS, EGRESS, CONSTRUCTION AND MAINTENANCE OF IRRIGATION DITCHES, PIPES OR FLUMES PURPOSES TO BANNING LAND COMPANY AND BANNING WATER COMPANY. THE EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD AND IS NOT PLOTTED HEREON.

(5) AN EASEMENT FOR DITCHES, PIPES OR FLUMES PURPOSES TO BANNING LAND COMPANY AND BANNING WATER COMPANY. RECORDED FEBRUARY 19, 1889 IN BOOK 92, PAGE 175, DEEDS. THE EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD AND IS NOT PLOTTED HEREON.

(6) AN EASEMENT FOR UTILITIES PURPOSES TO CITY OF BANNING, RECORDED MAY 12, 1958 AS INSTRUMENT NO. 34017, OFFICIAL RECORDS. EASEMENT LIES WITHIN SURVEYED PROPERTY AND IS PLOTTED HEREON.

(7) AN EASEMENT FOR TELEPHONE LINES, CONSISTING OF POLES, NECESSARY GUYS AND ANCHORS PURPOSES TO CITY OF BANNING, RECORDED MAY 12, 1958 AS INSTRUMENT NO. 34023, OFFICIAL RECORDS. EASEMENT LIES WITHIN SURVEYED PROPERTY AND IS PLOTTED HEREON.

(8) AN EASEMENT FOR PIPE LINES AND CONDUITS PURPOSES TO THE CITY OF BANNING, RECORDED JULY 7, 1958 AS INSTRUMENT NO. 48052, OFFICIAL RECORDS. THE EXACT LOCATION AND EXTENT OF SAID EASEMENT IS NOT DISCLOSED OF RECORD AND IS NOT PLOTTED HEREON.

SITE PLAN KEY NOTES

1 – STORAGE RACKS
2 – PROPOSED RAILROAD SPUR TRACK
3 – FUEL STORAGE AREA
4 – PROPOSED CHAIN LINK FENCING
5 – PROPOSE AC PAVEMENT / HEAVY-TRUCKS
6 – PROPOSED AC PAVEMENT / LIGHT-AUTOS
7 – PROPOSED AC / FORKLIFT PAVEMENT SECTION
8 – PROPOSED 30' DRIVEWAY
9 – PROPOSED 24' DRIVEWAY
10 – PROPOSED CONCRETE WALK
11 – PROPOSED PUBLIC STREET-AC/CURB & GUTTER, SIDEWALK
12 – PROPOSED MONUMENT SIGN
13 – PROPOSED SITE SIGNAGE

ANACAL ENGINEERING COMPANY
CIVIL ENGINEERING & LAND SURVEYING
1211 NORTH TUSTIN AVENUE ~ ANAHEIM, CALIFORNIA 92807
PHONE: (714) 774-1763 FAX: (714) 774-4690
E-MAIL ADDRESS: anacal@anacalengineering.com
WEB SITE: anacalengineering.com

9/6/22 | 1" = 40' | G. A. G. | D. C. Q.

CONCEPTUAL SITEPLAN
1210 & 1431 WEST LINCOLN STREET
BANNING, CALIFORNIA

JOB NO. 22-130C-SP

Appendix B Plant Species Observed Within the Study Area

Scientific Name	Common Name
Asteraceae (Aster family)	
Ambrosia dumosa	Western ragweed
Baccharis neglecta	Roosevelt weed
Baccharis sarothroides	Desert broom
*Gnaphalium spp.**	Cudweed
*Lactuca serriola **	Prickly lettuce
*Lasthenia gracilis**	Needle goldfields
*Matricaria discoidea**	Pineapple weed
*Oncosiphon piluliferum**	Stinknet
Symphyotrichum chilense	California aster
***Anacardiaceae* (Cashew family)**	
*Schinus molle**	Peruvian pepper
Arecaceae (Palm family)	
Syagrus romanzoffiana	Queen palm
*Washingtonia Robusta**	Mexican fan palm
Boraginaceae (Forget-me-not family)	
Amsinckia menziesii	Fiddleneck
Brassicaceae (Mustard family)	
*Brassica nigra**	Black mustard
*Brassica Tournefortii**	Sahara mustard
Pectocarya heterocarpa	Chuckwalla combseed
Plagiobothrys nothofulvus	Rusty popocornflower
*Sisymbrium irio **	London rocket
Cupressaceae (Cypress family)	
*Juniperus horizontalis**	Creeping juniper
Euphorbiaceae (Spurge family)	
*Croton setigerus**	Dove weed
Geraniaceae (Geranium family)	
*Erodium cicutarium**	Redstem stork's bill
Fabaceae (Pea family)	
Lupinus bicolor	Miniature lupine
*Medicago polymorpha **	Burr medic
Parkinsonia florida	Blue palo verde
Malvaceae (Mallow family)	
*Malva parviflora**	Cheeseweed
Pinaceae (Pine family)	

Scientific Name	Common Name
*Pinus sp.**	Pine
Polemoniaceae (Phlox family)	
Gilia spp.	Gilia species
Poaceae (Grass family)	
*Avena fatua **	Wild oat
*Bromus diandrus **	Ripgut brome
*Bromus madritensis subsp. Rubens **	Red brome
*Festuca arundinacea **	Tall fescue
*Festuca myuros **	Annual fescue
*Hordeum murinum **	Wall barley
*Poa bulbosa **	Bulbous bluegrass

Nomenclature follows the Jepson Manual, Second Edition (Baldwin et al 2011).
* = naturalized, non- native plant species.

Appendix C Wildlife Species Observed Within the Study Area

Scientific name	Common name
Birds	
Agelaius phoeniceus	Red-winged blackbird
Accipiter cooperii	Cooper's hawk
Buteo jamaicensis	Red-Tailed hawk
Cathartes aura	Turkey vulture
Corvus corax	Common Raven
Calypte anna	Anna's hummingbird
Corvus brachyrhynchos	American crow
Sturnus vulgaris	European Starling
Carpodacus mexicanus	House Finch
Charadrius vociferus	Killdeer
Hirundo rustica	Barn swallow
Sturnella neglecta	Western Meadowlark
Passerculus sandwichensis	Savanna sparrow
Petrochelidon pyrrhonota	Cliff swallow
Columba livia	Rock Pigeon
Euphagus cyanocephalus	Brewer's Blackbird
Zonotrichia leucophrys	White-crowned sparrow
Falco sparverius	American kestrel
Mimus polyglottos	Northern mockingbird
Sayornis saya	Say's phoebe
Melospiza melodia	Song sparrow
Passer domesticus	House Sparrow
Sayornis nigricans	Black phoebe
Spinus psaltria	Lesser goldfinch
Sturnella neglecta	Western meadowlark
Tyrannus vociferans	Cassin's kingbird
Quiscalus quiscula	Common Grackle
Zenaida macroura	Mourning Dove
Mammals	
Otospermophilus beecheyi	California ground squirrel
Sylvilagus audubonii	Desert cottontail

Appendix D Special-Status Species and Their Potential to Occur Within the Project Site

Potential for occurrence	Common name (Scientific name)	Federal listing status	State listing status	CNPS list	Number of records within 10 miles	Year(s) sighted
A	Chaparral sand-verbena *(Abronia villosa var. aurita)*	None	None	1B.1	8	1944-2014
A	Coachella Valley milk-vetch *(Astragalus lentiginosus var. coachellae)*	Endangered	None	1B.2	2	1904-1987
A	Jaeger's milk-vetch *(Astragalus pachypus var. jaegeri)*	None	None	1B.1	6	1897-1990
A	Mesa horkelia *(Horkelia cuneata var. puberula)*	None	None	1B.1	1	1921
A	Plummer's mariposa-lily *(Calochortus plummerae)*	None	None	4.2	20	1982-2010
A	Western spadefoot *(Spea hammondii)*	None	None	-	19	1923-2017
A	American badger *(Taxidea taxus)*	None	None	-	2	1893-1908
A	Los Angeles pocket mouse *(Perognathus longimembris brevinasus)*	None	None	-	28	1908-2017
A	Crotch bumble bee *(Bombus crotchii)*	None	None	-	4	1952-2020
A	Northwestern San Diego pocket mouse *(Chaetodipus fallax fallax)*	None	None	-	15	1993-2016
A	Narrow-leaf sandpaper-plant *(Petalonyx linearis)*	None	None	2B.3	1	1879-1879
A	Payson's jewelflower *(Caulanthus simulans)*	None	None	4.2	1	1968-1968
A	Southern California legless lizard *(Anniella stebbinsi)*	None	None	-	13	1893-2018
A	Stephens' kangaroo rat *(Dipodomys stephensi)*	Threatened	Threatened	-	16	1963-2018
A	Dulzura pocket mouse *(Chaetodipus californicus femoralis)*	None	None	-	2	1993-1995
A	Southern California rufous-crowned sparrow *(Aimophila ruficeps canescens)*	None	None	-	7	2002-2017
A	Coastal whiptail *(Aspidoscelis tigris stejnegeri)*	None	None	-	4	2004-2016
A	Yucaipa onion / Marvin's onion *(Allium marvinii)*	None	None	1B.2	7	2005-2020
A	White-bracted spineflower *(Chorizanthe xanti var. leucotheca)*	None	None	1B.2	15	1994-2018
A	Parry's spineflower *(Chorizanthe parryi var. parryi)*	None	None	1B.1	23	1969-2018
A	Mojave tarplant *(Deinandra mohavensis)*	None	Endangered	1B.3	18	1994-2019
A	San Diego desert woodrat *(Neotoma lepida intermedia)*	None	None	-	12	1994-2017
A	Yellow warbler *(Setophaga petechia)*	None	None	-	4	2014-2016
A	Pallid San Diego pocket mouse *(Chaetodipus fallax pallidus)*	None	None	-	6	1938-2000
A	Coastal California gnatcatcher *(Polioptila californica californica)*	Threatened	None	-	5	1999-2016

Potential for occurrence	Common name (Scientific name)	Federal listing status	State listing status	CNPS list	Number of records within 10 miles	Year(s) sighted
A	Red-diamond rattlesnake *(Crotalus ruber)*	None	None	-	5	1964-XXXX
A	Pallid bat *(Antrozous pallidus)*	None	None	-	2	1964-2011
A	Ferruginous hawk *(Buteo regalis)*	None	None	-	3	1991-2016
A	Smooth tarplant *(Centromadia pungens ssp. laevis)*	None	None	1B.1	10	1999
A	Least Bell's vireo *(Vireo bellii pusillus)*	Endangered	Endangered	-	7	1908-2016
A	Loggerhead shrike *(Lanius ludovicianus)*	None	None	-	2	2003-2006
A	Southern rubber boa *(Charina umbratica)*	None	Threatened	-	16	1967-2020
A	Western yellow bat *(Lasiurus xanthinus)*	None	None	-	2	1988-1989
A	Coast horned lizard *(Phrynosoma blainvillii)*	None	None	-	14	1908-2006
A	Horn's milk-vetch *(Astragalus hornii var. hornii)*	None	None	1B.1	1	1889-1889
A	Spiny-hair blazing star *(Mentzelia tricuspis)*	None	None	2B.1	1	1886-1886
A	Orange-throated whiptail *(Aspidoscelis hyperythra)*	None	None	-	6	1912-1994
A	Purple martin *(Progne subis)*	None	None	-	3	1897-1984
HP	Burrowing owl *(Athene cunicularia)*	None	None	-	5	2005-2015
A	San Bernardino aster *(Symphyotrichum defoliatum)*	None	None	1B.2	1	1999
A	Coachella Valley jerusalem cricket *(Stenopelmatus cahuilaensis)*	None	None	-	4	2009
A	Townsend's big-eared bat *(Corynorhinus townsendii)*	None	None	-	1	1997
A	Tricolored blackbird *(Agelaius tricolor)*	None	Threatened	-	1	2015
A	Palm Springs round-tailed ground squirrel *(Xerospermophilus tereticaudus chlorus)*	None	None	-	1	1938
A	Le Conte's thrasher *(Toxostoma lecontei)*	None	None	-	1	1916
A	Golden eagle *(Aquila chrysaetos)*	None	None	-	1	2008
A	Southern mountain yellow-legged frog *(Rana muscosa)*	Endangered	Endangered	-	4	1908-2012
A	Palmer's mariposa-lily *(Calochortus palmeri var. palmeri)*	None	None	1B.2	1	2016
A	Southern Cottonwood Willow Riparian Forest *(Southern Cottonwood Willow Riparian Forest)*	None	None	-	10	1980-1991
A	California glossy snake *(Arizona elegans occidentalis)*	None	None	-	9	1893-2015
A	Cooper's hawk *(Accipiter cooperii)*	None	None	-	1	2004
A	Southern Coast Live Oak Riparian Forest *(Southern Coast Live Oak Riparian Forest)*	None	None	-	8	1980
A	California horned lark *(Eremophila alpestris actia)*	None	None	-	1	2003

Potential for occurrence	Common name (Scientific name)	Federal listing status	State listing status	CNPS list	Number of records within 10 miles	Year(s) sighted
A	San Diego black-tailed jackrabbit *(Lepus californicus bennettii)*	None	None	-	3	2003-2004
A	Southwestern willow flycatcher *(Empidonax traillii extimus)*	Endangered	Endangered	-	2	2004
A	Prairie falcon *(Falco mexicanus)*	None	None	-	3	1977-1983
A	Southern Mixed Riparian Forest *(Southern Mixed Riparian Forest)*	None	None	-	1	1980
A	White rabbit-tobacco *(Pseudognaphalium leucocephalum)*	None	None	2B.2	2	2003-2004
A	Coastal cactus wren *(Campylorhynchus brunneicapillus sandiegensis)*	None	None	-	1	2001
A	San Bernardino kangaroo rat *(Dipodomys merriami parvus)*	Endangered	Candidate Endangered	-	8	1937-2015
A	San Bernardino gilia *(Gilia leptantha ssp. leptantha)*	None	None	1B.3	1	1931
A	Santa Ana River woollystar *(Eriastrum densifolium ssp. sanctorum)*	Endangered	Endangered	1B.1	1	1923
A	California satintail *(Imperata brevifolia)*	None	None	2B.1	1	1988
A	Desert Fan Palm Oasis Woodland *(Desert Fan Palm Oasis Woodland)*	None	None	-	1	1977
A	Latimer's woodland-gilia *(Saltugilia latimeri)*	None	None	1B.2	1	2015
A	Southern grasshopper mouse *(Onychomys torridus ramona)*	None	None	-	1	1938
A	Salt spring checkerbloom *(Sidalcea neomexicana)*	None	None	2B.2	1	1891
A	Coulter's goldfields *(Lasthenia glabrata ssp. coulteri)*	None	None	1B.1	2	2008-2010
A	Laguna Mountains jewelflower *(Streptanthus bernardinus)*	None	None	4.3	2	1982
A	Parish's alumroot *(Heuchera parishii)*	None	None	1B.3	1	1988
A	Western yellow-billed cuckoo *(Coccyzus americanus occidentalis)*	Threatened	Endangered	-	1	1893
A	White-tailed kite *(Elanus leucurus)*	None	None	-	1	2006
A	Mud nama *(Nama stenocarpa)*	None	None	2B.2	1	2010
A	Coachella Valley fringe-toed lizard *(Uma inornata)*	Threatened	Endangered	-	1	1975
A	San Jacinto Valley crownscale *(Atriplex coronata var. notatior)*	Endangered	None	1B.1	1	2004

Potential for occurrence	Common name (Scientific name)	Federal listing status	State listing status	CNPS list	Number of records within 10 miles	Year(s) sighted
A	Palm Springs pocket mouse *(Perognathus longimembris bangsi)*	None	None	-	1	2017
A	Dohrn's elegant eucnemid beetle *(Palaeoxenus dohrni)*	None	None	-	1	2017
A	San Felipe monardella *(Monardella nana ssp. leptosiphon)*	None	None	1B.2	1	1969

CNPS List Definitions

List 1A: Plants presumed extinct in California

List 1B.1: Plants rare, threatened, or endangered in California and elsewhere; seriously threatened in California

List 1B.2: Plants rare, threatened, or endangered in California and elsewhere, fairly threatened in California

List 1B.3: Plants rare, threatened, or endangered in California and elsewhere, not very threatened in California

List 2.1: Plants rare, threatened, or endangered in California, but more common elsewhere; seriously threatened in California

List 2.2: Plants rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in California

Potential for Occurrence Definitions

Absent [A] – Species distribution is restricted by substantive habitat requirements, which do not occur – or are negligible within the Project Site, and no further survey or study is obligatory to determine likely presence or absence of this species.

Habitat Present [HP] – Species distribution is restricted by substantive habitat requirements, which occur within the Project Site, and further survey or study may be necessary to determine likely presence or absence of species.

Present [P] – Species or species sign were observed within the Project's permanent disturbance footprint, or historically has been documented within the Project Site

Critical Habitat [CH] – The Project Site is located within a USFWS-designated critical habitat unit

.

Appendix E Burrowing Owl Survey Report

BROWN AND STRAUSS INDUSTRIAL PROJECT

July 2023

BURROWING OWL SURVEY

Beaumont United States Geological Survey
7.5-MinuteTopographic Quadrangle Map

Prepared By

NOREAS
Environmental Engineering and Science

16361 Scientific Way, Irvine, CA 92618
(949) 467-9100

TABLE OF CONTENTS

Section **Page**

1.0 SUMMARY / INTRODUCTION 1-1

2.0 BURROWING OWL BACKGROUND 2-1

3.0 METHODS 3-1

4.0 BURROWING OWL SURVEY RESULTS 4-1

5.0 RECOMMENDED MEASURES TO AVOID AND MINIMIZED IMPACTS TO NESTING BIRDS 5-1

6.0 REFERENCES 6-1

FIGURES

Figure 1 Regional Location 1-2

Figure 2 Site Vicinity 1-3

Figure 3 Results 4-5

1.0 SUMMARY / INTRODUCTION

Brown Strauss, Inc. (Brown and Strauss) is proposing to develop the Brown and Strauss Industrial Project (hereafter referred to as the Project). The Project Site is located within the City of Banning, Riverside County, California (Figures 1 and 2), north of West Lincoln Street and west of South 8th Street (Assessor's Parcel Numbers [APNs] 540-180-020, 540-180-022 and540-180-026). This report provides the methods, assumptions, and results of focused surveys for Burrowing Owl (*Athene cunicularia*). The Project Site can be found on the Beaumont United States Geological Survey (USGS) 7.5-MinuteTopographic Quadrangle Map (USGS 1984).

The Project occurs at an approximate elevation of 2,400 ft. above mean sea level (msl). Land use in the vicinity of the Project includes commercial, agriculture, residential and industrial endeavors. For the purposes of this report, the "study area" includes the Project's proposed ground disturbance footprint (Project Site), plus a 500-foot buffer where practical (Figures 1 and 2). The Project Site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), Pass Area Plan. According to the Regional Conservation Authority (RCA) MSHCP Information Map, Project limits are within a Burrowing Owl study area. Agricultural and other commercial development activities were historically operated within Project limits. There is also evidence of recent disking throughout the Project Site.

No Burrowing Owls were detected nesting, foraging, or dispersing within the study area during the 2022 and 2023 surveys. Numerous – albeit low quality potential burrows, and burrow complexes were detected (Figure 3). The burrows observed lacked evidence of owl sign (i.e., tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, and nest burrow decoration materials). With that said, the lack of Burrowing Owls within the study area is likely a result of the depauperate landscape, and the presence of owl predators. Although the Project has potential to impact lands that could be utilized by Burrowing Owls as habitat, surveys for the species are negative. Therefore, there is no presumption that the Project would result in the loss of individual Burrowing Owls, or that it would adversely affect local - or regional populations, of them.

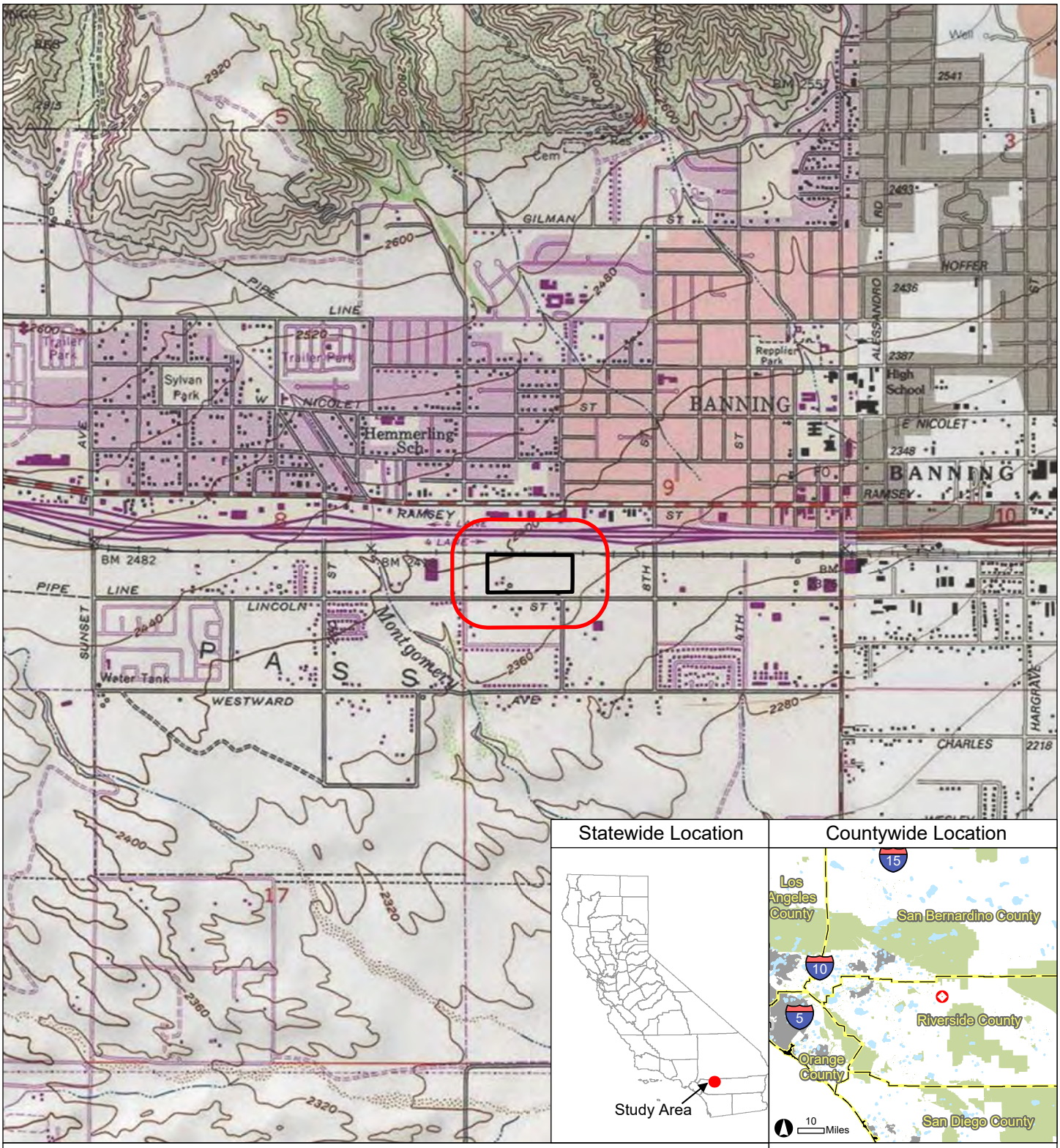


Figure 1. Regional Location

Project Site (14.77 acres)

Study Area (72.77 acres)

0 200 400 Feet

1 inch = 400 feet

Data Sources:
- ESRI World Imagery 6/9/2020

Map Prepared: 4-19-23

Prepared by:

NOREAS
Environmental Engineering and Science

Figure 2. Site Vicinity

2.0 BURROWING OWL BACKGROUND

The Burrowing Owl has been designated by the California Department of Fish and Wildlife (CDFW) as a species of special concern. "State Species of Special Concern" status applies to animals not listed for protection under the federal Endangered Species Act or the California Endangered Species Act. The designation denotes that a species is declining at a rate that could result in State listing or that a species has historically occurred in low numbers and known threats to their persistence currently exist. The designation is intended to result in "special consideration" for these animals during the environmental review and discretionary permitting processes. In addition, the designation is also intended to focus research and management attention on poorly-known, potentially at-risk species by stimulating the collection of additional information on their biology, distribution, and status.

Burrowing Owls prefer open, dry annual or perennial grasslands, agricultural and rangelands, deserts, and scrublands characterized by low-growing vegetation. Burrowing Owls also prefer areas inhabited by small mammals as they predominately depend on mammal burrows (particularly ground squirrels) for subterranean nesting. Owls can be found at elevations ranging from 200 ft. below sea level to 9,000 ft. above (CDFG 1995). Burrowing Owls commonly perch on fence posts or on mounds outside their burrows. Northern populations of Burrowing Owls are usually migratory, while more southern populations may move short distances or not at all (Haug et al. 1993, Botelho 1996). Little is known about the winter ranges of migratory populations, although migratory Burrowing Owls are believed to mix with resident populations in California during the winter months (Coulombe 1971, Haug et al. 1993).

Burrowing Owls tend to be resident where food sources are stable and available year-round (Rosenberg et al. 1998). Typically, they disperse or migrate south in areas when food becomes seasonally scarce. Burrowing Owls tend to be opportunistic feeders. Large arthropods, mainly beetles and grasshoppers, comprise a substantial portion of their diet (Rosenberg et al. 1998). Small mammals, especially mice, rats, gophers, and ground squirrels, are also important food items. Other prey animals include reptiles and amphibians, scorpions, young cottontail rabbits, bats, and birds such as sparrows and Horned Larks. Consumption of insects increases during the breeding season. Burrowing Owls hover while hunting; after catching their prey they return to perches on fence posts or the ground. Burrowing Owls are primarily active at dusk and dawn, but, if necessary, will hunt at any time of day (CBOC 1993, CDFG 1995; Rosenberg et al. 1998).

The breeding season for Burrowing Owls is March to late August; the season tends to last later in the northern part of the range (CBOC 1993, CDFG 1995, Klute et al. 2003). Clutch size (number of birds hatched at the same time) ranges from 1 to 12 and averages about 7 (Ehrlich 1988). The incubation period is 28–30 days (Ehrlich 1988). The female performs all the incubation and brooding (sitting on eggs to hatch them by the warmth of the body) and is believed to remain continually in the burrow while the male does all the hunting (Rosenberg et al. 1998). The young fledge (take their first flight out of the nest) at 44 days but remain near the burrow and join the adults in foraging flights at dusk (Ehrlich 1988). The maximum life span recorded for a banded bird in the wild is approximately 8.5 years (Rosenberg et al. 1998).

In resident populations, nest site fidelity is common, with many adults nesting each year in their previous year's burrow; young from the previous year often establish nest sites near (<900 ft) their natal sites (Trulio 1997,Rosenberg et al. 1998). Burrowing Owls in migratory populations also often nest in the same burrow, particularly if the previous year's breeding was successful (Belthoff and King 1997). Other birds in the same population may move to burrows near their previous year's burrow. The species is

threatened primarily by loss, degradation, and fragmentation of habitat, although they do readily inhabit anthropogenic landscapes such as agricultural fields, golf courses, and airport grasslands (Korfanta et al. 2005).

3.0 METHODS

Prior to beginning field surveys, resource specialists were consulted and available information from resource management plans and relevant documents were reviewed to determine the locations and types of resources that have the potential to exist within and adjacent to the study area. Resources were evaluated within several miles of the Project. The materials reviewed included, but were not limited to, the following:

- U.S. Fish and Wildlife Service (USFWS) Critical Habitat Mapper and File Data (USFWS 2023a);
- USFWS Carlsbad Field Office Species List for Riverside County (USFWS 2023b);
- California Natural Diversity Database maintained by the CDFW (CDFW 2023);
- 1993 California Burrowing Owl Consortium (CBOC)Burrowing Owl Survey Protocol and Mitigation Guidelines;
- 2021 California Department of Fish and Game (CDFG) Staff Report on Burrowing Owl Mitigation;
- Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP 2003); and
- Aerial Photographs (Microsoft Corporation 2023).

A Burrowing Owl habitat suitability assessment and burrow survey was conducted on November 30, 2022 in accordance with the *March 29, 2006 Western Riverside County MSHCP Burrowing Owl Survey Instructions*. Natural and non-natural substrates were examined for potential burrow sites and complexes. Potential burrows encountered were examined for shape, size, molted feathers, whitewash, cast pellets and/or prey remains. Disturbance characteristics and other animal sign encountered within the study area were documented, to the greatest extent practical.

Since suitable habitat was observed for Burrowing Owls within the study area, four (4) additional surveys were performed (details are presented within *TABLE NO. 1 - SUMMARY OF SURVEY CONDITIONS FOR SURVEYS*). A hand-held, global positioning system (GPS) unit with sub meter accuracy was used to survey predetermined transects that were prepared within a Geographic Information System prior to the start of owl surveys (Figure 3). Survey transects were spaced at appropriate intervals to allow for complete visual coverage of the Project Site, and study area. Where necessary, transect spacing was reduced or expanded in the field - to account for differences in terrain, vegetation density, visibility, health and safety, and access (i.e., private property) considerations. Where access was limited, observations were made from the nearest appropriate vantage points by means of public rights-of-way with the use of binoculars and spotting scopes. The presence of a species was based on direct observations of individual(s), sign, and/or vocalization. Avian scientific nomenclature and common names follows Sibley (2000).

Field surveys were conducted when weather conditions were conducive to observing birds. Surveys were not performed during rain, extreme temperatures, high winds (> 25 miles per hour), or dense fog. Targeted owl surveys were conducted on 12 and 27 March, 05 and 25 April 2023. Surveys were performed from approximately 1 hour before sunrise to 2 hours after sunrise, and from approximately 2 hours before sunset to 1 hours after sunset - when weather conditions were conducive to observing owls outside of burrows.

4.0 BURROWING OWL SURVEY RESULTS

The majority of the study area consists of heavily disturbed ruderal vegetation, with no substantial native stands of vegetation. Agricultural, commercial development, and residential activities were historically operated within Project limits. There is also evidence of recent disking, trash from illegal dumping throughout the Project Site, and an active railroad paralleling the Project's northern border.

No Burrowing Owls were observed nesting, foraging, or dispersing within the study area during the 2022 and 2023 surveys. Nonetheless, potential burrows and burrow complexes – albeit low quality, were detected (Figure 3). The burrows observed lacked evidence of owl tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, or nest burrow decoration materials. The presence of several burrows and burrow complexes >11 centimeters (cm) in diameter (height and width), and >150 cm in depth warranted recording and reporting; even though the aforementioned burrows lacked owl sign, or owls. Survey conditions during the field events are presented in Table No. 1.

TABLE NO. 1 - SUMMARY OF SURVEY CONDITIONS FOR SURVEYS

Survey Dates	Surveyors	Survey Type	Time[1] Start/End	Temperature °Fahrenheit Start/End	Wind Speed (MPH)	Start/End Cloud Cover (%)	Date of last precipitation prior to survey
11/30/22	Lincoln Hulse	Burrow Survey and Crepuscular BUOW	0700-1600	55/70	0-05	Clear/Clear	09/09/22
3/12/23	Jill Coumoutso	Burrow Survey and Crepuscular BUOW	0600-1100	52/63	0-05	Cloudy/Cloudy	03/01/22
3/27/23	Jill Coumoutso	Crepuscular BUOW	0530-1200	49/62	0-10	Clear/Clear	03/01/23
4/05/23	Jill Coumoutso	Crepuscular BUOW	0530-1200	50/68	0-05	Clear/Clear	03/01/23
4/25/23	Jill Coumoutso	Crepuscular BUOW	0530-1200	53/60	0-05	Cloudy/Clear	03/01/23
BUOW = Burrowing Owl **MPH = Miles Per Hour**							

The lack of Burrowing Owls within the study area is likely a result of the depauperate landscape, active rail road paralleling the Project's northern boundary, and the presence of owl predators (e.g., Red-Tailed Hawk [*Buteo jamaicensis*] and Cooper's hawk [*Accipiter cooperii*]). Although the Project has potential to impact lands that could be utilized by Burrowing Owls as habitat – under the appropriate suite of environmental conditions, surveys for the species are negative. Therefore, there is no presumption that the Project would result in the loss of individual Burrowing Owls, or that it would adversely affect local - or regional, populations of them.

[1] While targeted owl surveys were limited to approximately 1 hour before sunrise to 2 hours after sunrise and 2 hours before sunset to 1 hour after sunset; the start and end times presented within this table details all time spent within the study area on any given day - which include setup, reporting and demobilization activities.

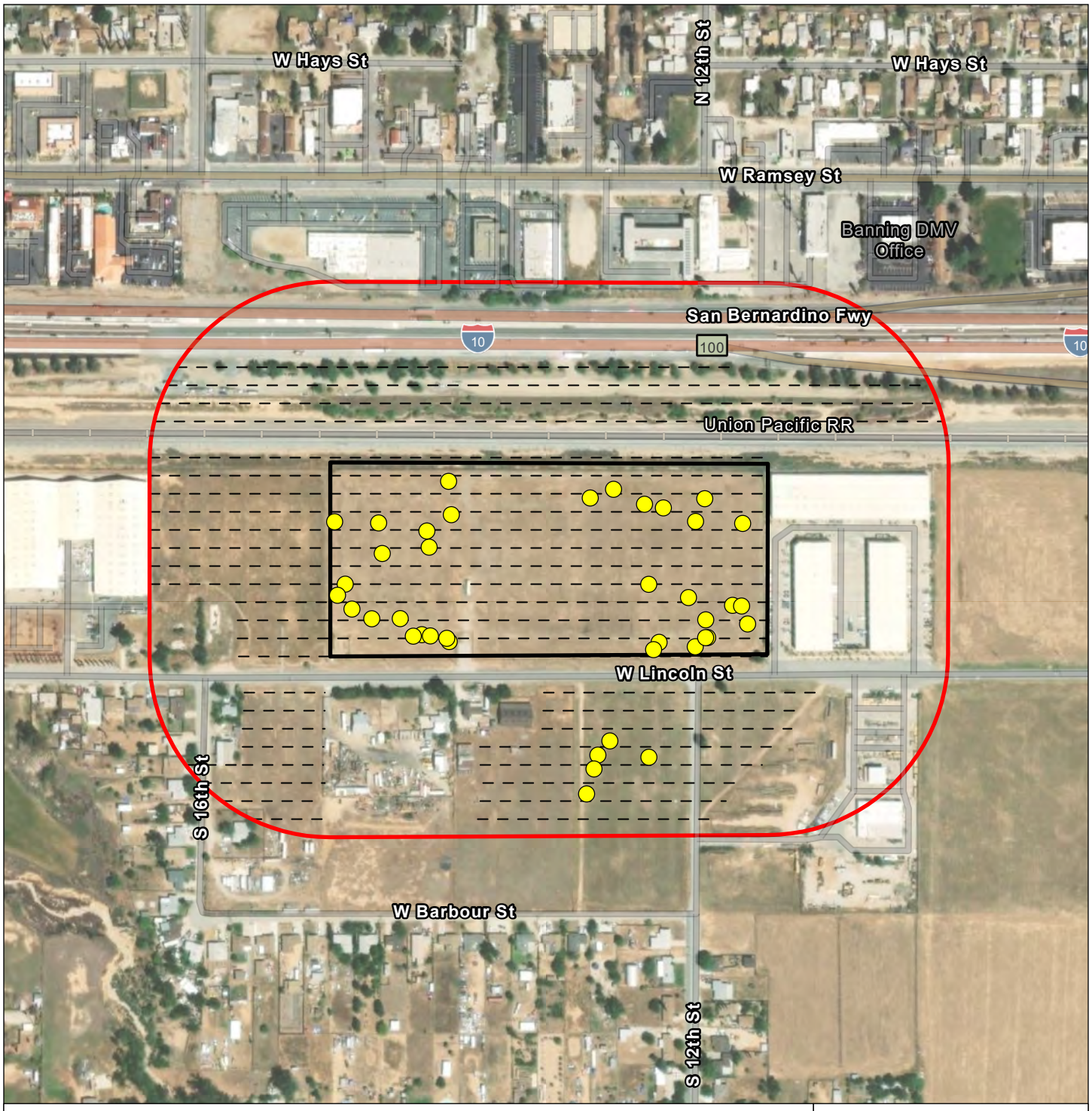
Representative photographs of the study area are provided below, and wildlife detected during the surveys are provided within Table No. 2.

	**Photograph 1.** Facing Southwest.
	**Photograph 2.** Facing East.

	**Photograph 3.** Facing North.
	**Photograph 4.** Potential burrow.

TABLE NO. 2 – WILDLIFE DETECTED DURING FIELD SURVEYS

Scientific name	Common name
Birds	
Agelaius phoeniceus	Red-winged blackbird
Accipiter cooperii	Cooper's hawk
Buteo jamaicensis	Red-Tailed hawk
Cathartes aura	Turkey vulture
Corvus corax	Common Raven
Calypte anna	Anna's hummingbird
Corvus brachyrhynchos	American crow
Sturnus vulgaris	European Starling
Carpodacus mexicanus	House Finch
Charadrius vociferus	Killdeer
Hirundo rustica	Barn swallow
Sturnella neglecta	Western Meadowlark
Passerculus sandwichensis	Savanna sparrow
Petrochelidon pyrrhonota	Cliff swallow
Columba livia	Rock Pigeon
Euphagus cyanocephalus	Brewer's Blackbird
Zonotrichia leucophrys	White-crowned sparrow
Falco sparverius	American kestrel
Mimus polyglottos	Northern mockingbird
Sayornis saya	Say's phoebe
Melospiza melodia	Song sparrow
Passer domesticus	House Sparrow
Sayornis nigricans	Black phoebe
Spinus psaltria	Lesser goldfinch
Sturnella neglecta	Western meadowlark
Tyrannus vociferans	Cassin's kingbird
Quiscalus quiscula	Common Grackle
Zenaida macroura	Mourning Dove
Mammals	
Otospermophilus beecheyi	California ground squirrel
Sylvilagus audubonii	Desert cottontail



Project Site
Study Area
Burrowing Owl Survey Transects
Potential Burrow

0 200 400 Feet

1 inch = 400 feet

Data Sources:
-ESRI World Imagery 6/9/2020

Map Prepared: 7-5-23

Prepared by:
NOREAS
Environmental Engineering and Science

Figure 3. Burrowing Owl Survey Results

5.0 RECOMMENDED MEASURES TO AVOID AND MINIMIZED IMPACTS TO NESTING BIRDS

The following measures are recommended as a means of avoiding, and minimizing adverse impacts to nesting birds that have the potential to occur within the Project Site, and on adjacent lands:

- Due to the presence of potentially suitable habitat, a 30-day pre-construction survey for Burrowing Owls is warranted prior to initial ground-disturbing activities (including vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.). This is an MSHCP requirement, which safeguards that no owls have colonized the Project Site in the days - or weeks, preceding ground-disturbing activities.

    - If Burrowing Owls have colonized the Project Site prior to the initiation of ground-disturbing activities, the Project shall immediately inform the RCA and the appropriate wildlife agencies, to coordinate further regarding the need for a Project specific Burrowing Owl Protection and/or Relocation Plan.

    - If ground-disturbing activities occur, but the Project Site is left undisturbed for more than 30 days, a pre-construction survey will again be warranted to safeguard that Burrowing Owls have not colonized the Project Site since it was last disturbed. If Burrowing Owl is found, the same coordination described above would be necessary

- In order to comply with Section 10 of the Migratory Bird Treaty Act and relevant sections of the California Fish and Game Code, any vegetation clearing within the Project Site should take place outside of the typical avian nesting season (e.g., March 15th until September 1st) – to the maximum extent practical. If work needs to take place between March 15th and September 1st, a pre-activity survey for nesting birds would be warranted prior to the onset of Project activities. To the maximum extent practicable, a buffer zone from occupied nests should be maintained during physical ground disturbing activities. Once nesting has ended, the buffer may be removed.

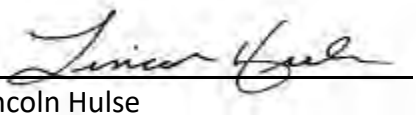
- Limits of grading and construction activities shall be clearly delineated with temporary construction staking, flagging, or similar materials.

- To avoid attracting predators and nuisance species, the Project Site shall be clear of debris, where possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from the Project.

The services performed and documented in this report have been conducted in a manner consistent with the level of care and skill ordinarily exercised by other professional consultants under similar circumstances. No other representations are either expressed or implied and no warranty or guarantee is included or intended in this report. Opinions relating to presence, absence, or potential for occurrence of biological resources are based on limited data and actual conditions may vary from those encountered at the times and locations where the data were obtained despite due professional care.

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

DATE: July 07, 2023

SIGNED: 

Lincoln Hulse

6.0 REFERENCES

Belthoff, J. R., and R. A. King. 1997. Between-year movements and nest burrow use by burrowing owls in southwestern Idaho. Technical Report No. 97-3. Idaho Bureau of Land Management.

Botelho, E. S. 1996. Behavioral ecology and parental care of breeding western burrowing owls (*Speotyto cunicularia hupugaea*) in southern New Mexico, USA. Dissertation, New Mexico State University, Las Cruces.

California Burrowing Owl Consortium (CBOC). 1993. Burrowing Owl Survey Protocol and Mitigation Guidelines. San Francisco CA

California Department of Fish and Game (CDFG). 1995. Staff Report on Burrowing Owl Mitigation. Sacramento CA

_____. 2012. Staff Report on Burrowing Owl Mitigation. Sacramento CA

California Department of Fish and Wildlife (CDFW). 2022. RareFind California Department of Fish and Game Natural Diversity Database (CNDDB) Fontana and Devore USGS 7.5-Minute Quadrangles. Sacramento, CA: California Department of Fish and Game, Biogeographic Data Branch.

Coulombe, H. N. 1971. Behavior and population ecology of the burrowing owl, *Speotyto cunicularia*, in the Imperial Valley of California. Condor 73:162–176.

County of Riverside. 2003. Final Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Riverside, CA: County of Riverside.

County of Riverside. 2006. Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area (E.P. Department, ed), p. 4. Riverside, CA: County of Riverside.

Ehrlich, P. R. 1988. The Birders Handbook: Natural History of North American Birds. Simon and Schuster Inc. New York

Haug, E. A., B. A. Millsap, and M. S. Martell. 1993. The burrowing owl (*Speotyto cunicularia*). In A. Poole and F. Gill (eds.), The Birds of North America, No. 61. Philadelphia, PA: The Academy of Natural Sciences and Washington, DC: The American Ornithologists' Union.

Klute, D. S., L. W. Ayers, M. T. Green, W. H. Howe, S. L. Jones, J. A. Shaffer, S. R. Sheffield, and T. S. Zimmerman. 2003. Status Assessment and Conservation Plan for the Western Burrowing Owl in the United States. U.S. Department of Interior, Fish and Wildlife Service, Biological Technical Publication FWS/BTP-R6001-2003, Washington, D.C.

Korfanta, N.M., D.B. McDonald, and T.C. Glenn. 2005. Burrowing owl (*Athene cunicularia*) population genetics: A comparison of North American forms and migratory habits. *Auk* 122(2): 464-478.

Microsoft Corporation. 2023. Bing Maps Aerial Imagery. Redmond, WA.

Rosenberg, D. K., J. Gervaia, H. Ober, and D. DeSante. 1998. An adaptive management plan for the burrowing owl population at Naval Air Station Lemoore, Lemoore, California.

Sibley, D.A. 2000. The Sibley Guide to Birds. Random House Press, New York, New York. 201 pp.

Trulio, L. 1997. Burrowing owl demography and habitat use at two urban sites in Santa Clara County, California. Journal of Raptor Research 9:84–89.

United States Fish and Wildlife Service (USFWS). 2023. Critical Habitat Portal. USFWS

United States Geological Service (USGS). 1984. 7.5-Minute Quadrangle Beaumont, California.

Appendix F Narrow Endemic Plant Survey Report

BROWN AND STRAUSS INDUSTRIAL PROJECT

July 2023

NARROW ENDEMIC PLANT SURVEY REPORT

Prepared By

16361 Scientific Way, Irvine, CA 92618
(949) 467-9100

TABLE OF CONTENTS

Section **Page**

1.0 INTRODUCTION / SUMMARY 1-1

2.0 METHODS 2-1

3.0 BOTANICAL SURVEY RESULTS 3-1

4.0 REFERENCES 4-1

FIGURES

Figure 1 Regional Location 1-2

Figure 2 Site Vicinity 1-3

Figure 3 Reference Population Map 2-3

APPENDIX A

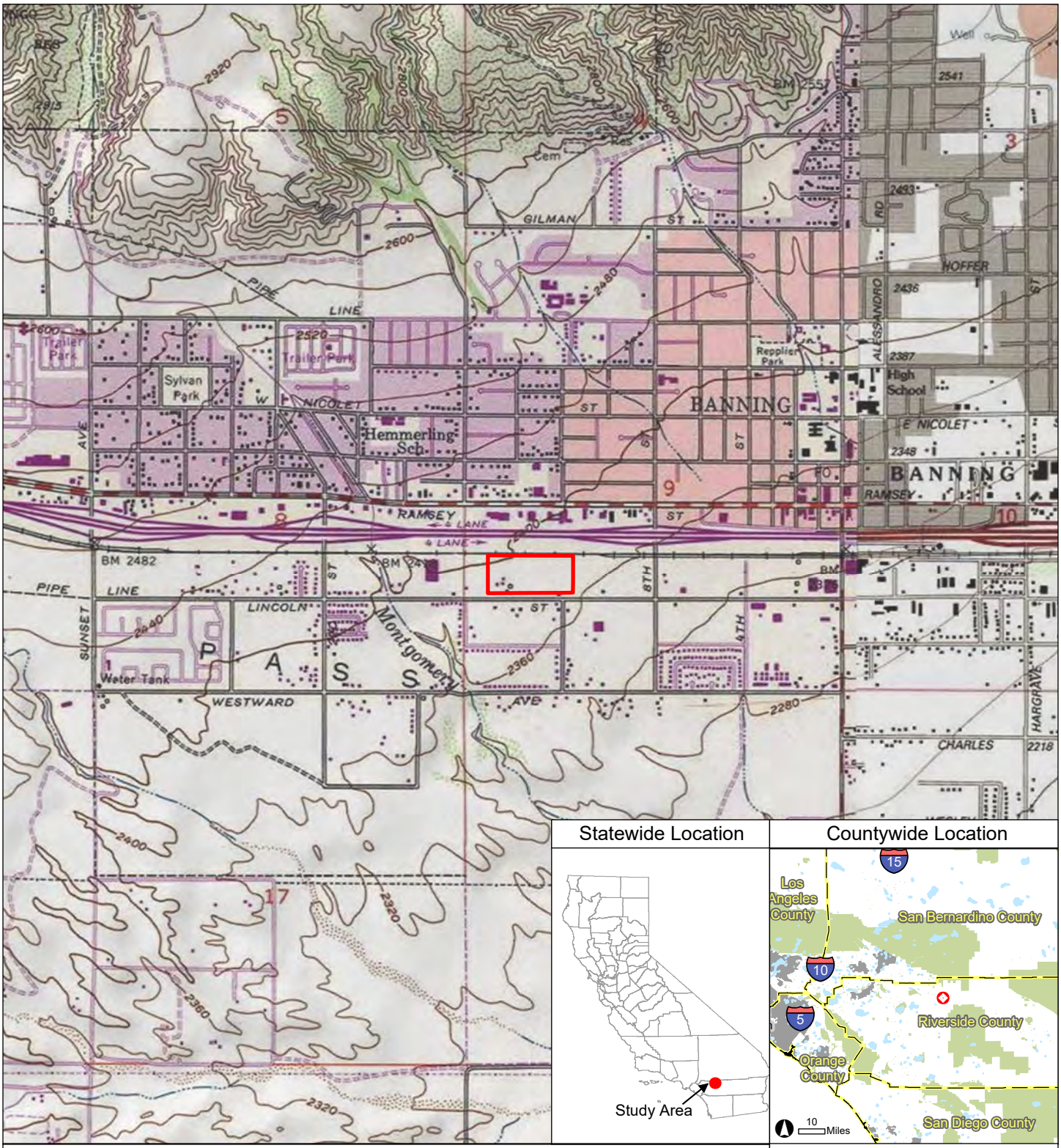
PHOTOGRAPH LOG

1.0 INTRODUCTION / SUMMARY

To support the Brown and Strauss Project (hereafter referred to as the Project), NOREAS Inc. (NOREAS) performed a focused Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), narrow endemic sensitive plant species visual encounter survey. According to the Regional Conservation Authority (RCA) MSHCP Information Map, the Project limits lie partially - or are completely within predetermined survey areas for narrow endemic sensitive plant species (i.e., Marvin's onion [*Allium marvinii*] and Many-stemmed dudleya [*Dudleya multicaulis*]).

The Project Site is located within the City of Banning, Riverside County, California (Figures 1 and 2); north of West Lincoln Street, and west of South 8th Street (Assessor's Parcel Numbers [APNs] 540-180-020, 540-180-022 and 540-180-026). The Project can be found on the Beaumont United States Geological Survey (USGS) 7.5-MinuteTopographic Quadrangle Map (USGS 1984). For the purposes of this report, the "Project Site" includes the Project's proposed ground disturbance footprint (Project Site). This report provides the methods, assumptions, and results of the 2023 targeted plant surveys for Marvin's onion and Many-stemmed dudleya.

In summary, Marvin's onion and Many-stemmed dudleya were not detected during the surveys. Given the extent of anthropogenic disturbance within the Project Site, the habitat quality is extremely low for special status plants. Therefore, there is no presumption that the Project would result in the loss of individual Marvin's onion and Many-stemmed dudleya, nor that it would adversely affect local or regional populations of them.



The Study Area is located in Riverside County on the Beaumont USGS 7.5-minute quadrangle map; San Bernardino Meridian, Township 3 South, Range 1 East, in Section 9
Center coordinate (WGS 1984): 116.891°W 33.923°N

Figure 1. Regional Location

Project Site (14.77 acres)

0 200 400 Feet

1 inch = 400 feet

Data Sources:
- ESRI World Imagery 6/9/2020

Map Prepared: 7-2-23

Prepared by:
NOREAS
Environmental Engineering and Science

Figure 2. Site Vicinity

2.0 METHODS

Prior to beginning field surveys, resource specialists were consulted and available information from resource management plans and relevant documents were reviewed to determine the locations and types of resources that have the potential to exist within and adjacent to the Project Site. Resources were evaluated within several miles of the Project. The primary materials reviewed included, but were not limited to, the following:

- ✓ US Fish and Wildlife Service (USFWS) Critical Habitat Mapper and File Data (USFWS 2023a);
- ✓ USFWS Riverside County Field Office Species List (USFWS 2023b);
- ✓ USFWS National Wetlands Inventory database (USFWS 2023c);
- ✓ California Natural Diversity Database maintained by the California Department of Fish and Wildlife (CDFW) (CDFW 2023);
- ✓ Natural Resource Conservation Service, Soil Survey Geographic Database (SSURGO) (USDA-NRCS 2023a);
- ✓ California Native Plant Society (CNPS) Electronic Inventory (CNPS 2023);
- ✓ MSHCP Transportation and Land Management Agency Geographic Information Services Database (GISD 2023);
- ✓ Regional Conservation Authority GIS Data Mapping Tool (RCA 2032, https://www.wrc-rca.org/rcamaps/);
- ✓ Western Riverside County Multiple Species Habitat Conservation Plan (Dudek 2003); and
- ✓ Aerial Photographs (Microsoft Corporation 2023).

Plants were identified to the lowest taxonomic[1] level sufficient to determine whether the species detected were non-native, native, or special-status. Plants of uncertain identity were subsequently identified from taxonomic keys (Baldwin et al. 2012). Scientific and common species names were recorded according to The Jepson Manual (Baldwin et al. 2012).

Focused botanical surveys were conducted on 14 April and 17 May, 2023. Field survey methods were derived from the standardized guidelines issued by the U.S. Fish and Wildlife Service (USFWS 2000), California Department of Fish and Wildlife (CDFW 2009) and the California Native Plant Society (CNPS 2001). As previously stated, the field surveys were specifically conducted to determine the presence/absence of Marvin's onion and Many-stemmed dudleya, but the surveys were floristic[2] in nature. Surveys were conducted during the appropriate blooming period for Marvin's onion and Many-stemmed dudleya.

An evaluation of reference populations was performed prior to initiating surveys in early April of 2023 to safeguard that survey timing was appropriate[3], and to assess local variations in plant phenology[4] of the target species (Figure 3, Appendix A – Photographs 5 and 6). To that end, a targeted and methodical pedestrian-survey for Marvin's onion and Many-stemmed dudleya was conducted by walking through

[1] Botanical taxonomy is the practice and science of categorization or classification. A taxonomy (or taxonomical classification) is a scheme of classification, especially a hierarchical classification, in which plants are organized into groups or types.

[2] Focused on the distribution, number, types, and relationships of plant species in an area, or multiple areas.

[3] Prior to field surveys, a botanist visited a representative number of reference populations in 2023 to safeguard that survey timing was appropriate and to assess local variations in plant phenology. Reference populations were visited for both species that have a potential to occur.

[4] Phenology is the study of periodic events in biological life cycles and how these are influenced by seasonal and interannual variations in climate, as well as habitat factors.

areas of suitable habitat within Project Site. Survey transects[5] were spaced to allow for complete visual coverage of the Project Site. Transect spacing was reduced or expanded in the field to account for differences in terrain, vegetation density, visual field, health and safety considerations, access issues, and areas of potential habitat to provide adequate visibility.

[5] A transect is a path along which one counts and records occurrences of the objects of study.

Figure 3. Reference Population Map

3.0 BOTANICAL SURVEY RESULTS

Weather conditions during the April and May 2023 surveys included partly cloudy skies, temperatures ranging from 65–72 °F, and winds vacillating from 0 to 05 miles per hour. During the pedestrian surveys it was determined that greater than 99% of the Project Site was comprised of disturbed, and/or non-native land cover types. Marvin's onion and Many-stemmed dudleya was not detected during any of pedestrian based biological surveys which were performed within the Project Site. Representative photographs of the Project Site, Marvin's onion and Many-stemmed dudleya reference populations are provided in Appendix A. Plant species observed during the surveys are listed in Appendix B.

The services performed and documented in this report have been conducted in a manner consistent with the level of care and skill ordinarily exercised by other professional consultants under similar circumstances. No other representations are either expressed or implied and no warranty or guarantee is included or intended in this report. Opinions relating to presence, absence, or potential for occurrence of biological resources are based on limited data and actual conditions may vary from those encountered at the times and locations where the data were obtained despite due professional care.

4.0 REFERENCES

Baldwin, J., D. Goldman, D. Keil, R. Patterson, and T. Rosatti. 2012. The Jepson Manual: Higher Plants of California. Berkeley: University of California Press.

California Department of Fish and Wildlife (CDFW). 2023. RareFind California Department of Fish and Game Natural Diversity Database (CNDDB) Fontana and Devore USGS 7.5-Minute Quadrangles. Sacramento, CA: California Department of Fish and Game, Biogeographic Data Branch.

California Department of Fish and Wildlife (CDFW). 2009. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities

California Native Plant Society (CNPS). 2001. Botanical Survey Guidelines of the California Native Plant Society.

California Native Plant Society (CNPS). 2023. CNPS Electronic Inventory of Rare and Endangered Plants: CNPS.

Holland, R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California (California Department of Fish and Game, The Resources Agency, ed), p. 156. Sacramento, CA.

Microsoft Corporation. 2023. Bing Maps Aerial Imagery. Redmond, WA.

United States Fish and Wildlife Service (USFWS). 2023. Critical Habitat Portal. USFWS

United States Geological Service (USGS). 1984. 7.5-Minute Quadrangle Beaumont, California.

APPENDIX A

PHOTOGRAPH LOG

	**Photograph 1.** Facing Southwest.
	**Photograph 2.** Facing East.

	**Photograph 3.** Facing North.
	**Photograph 4.** Facing West.

	**Photograph 5.** Marvin's onion reference population.
	**Photograph 6.** Many-stemmed dudleya reference population.

APPENDIX B

PLANT SPECIES OBSERVED

Scientific Name	Common Name
Asteraceae (Aster family)	
Ambrosia dumosa	Western ragweed
Baccharis neglecta	Roosevelt weed
Baccharis sarothroides	Desert broom
*Gnaphalium spp.**	Cudweed
*Lactuca serriola **	Prickly lettuce
*Lasthenia gracilis**	Needle goldfields
*Matricaria discoidea**	Pineapple weed
*Oncosiphon piluliferum**	Stinknet
Symphyotrichum chilense	California aster
***Anacardiaceae* (Cashew family)**	
*Schinus molle**	Peruvian pepper
Arecaceae (Palm family)	
Syagrus romanzoffiana	Queen palm
*Washingtonia Robusta**	Mexican fan palm
Boraginaceae (Forget-me-not family)	
Amsinckia menziesii	Fiddleneck
Brassicaceae (Mustard family)	
*Brassica nigra**	Black mustard
*Brassica Tournefortii**	Sahara mustard
Pectocarya heterocarpa	Chuckwalla combseed
Plagiobothrys nothofulvus	Rusty popocornflower
*Sisymbrium irio **	London rocket
Cupressaceae (Cypress family)	
*Juniperus horizontalis**	Creeping juniper
Euphorbiaceae (Spurge family)	
*Croton setigerus**	Dove weed
Geraniaceae (Geranium family)	
*Erodium cicutarium**	Redstem stork's bill
Fabaceae (Pea family)	
Lupinus bicolor	Miniature lupine
*Medicago polymorpha **	Burr medic
Parkinsonia florida	Blue palo verde
Malvaceae (Mallow family)	
*Malva parviflora**	Cheeseweed
Pinaceae (Pine family)	

Scientific Name	Common Name
*Pinus sp.**	Pine
Polemoniaceae (Phlox family)	
Gilia spp.	Gilia species
Poaceae (Grass family)	
*Avena fatua **	Wild oat
*Bromus diandrus **	Ripgut brome
*Bromus madritensis subsp. Rubens **	Red brome
*Festuca arundinacea **	Tall fescue
*Festuca myuros **	Annual fescue
*Hordeum murinum **	Wall barley
*Poa bulbosa **	Bulbous bluegrass

An "*" non-native plant species.

Appendix G Photographic Log

	**Photograph 1.** Facing Southwest.
	**Photograph 2.** Facing East.

	**Photograph 3.** Facing North.
	**Photograph 4.** Facing West.

Appendix H Project GIS Files (provided separately)