

Memorandum

Date: March 24, 2025

To: Michael Mileski, Mileski Living Trust C/O Synergy Consulting

From: Michael W. Tuma, PhD, Principal Biologist, FirstCarbon Solutions

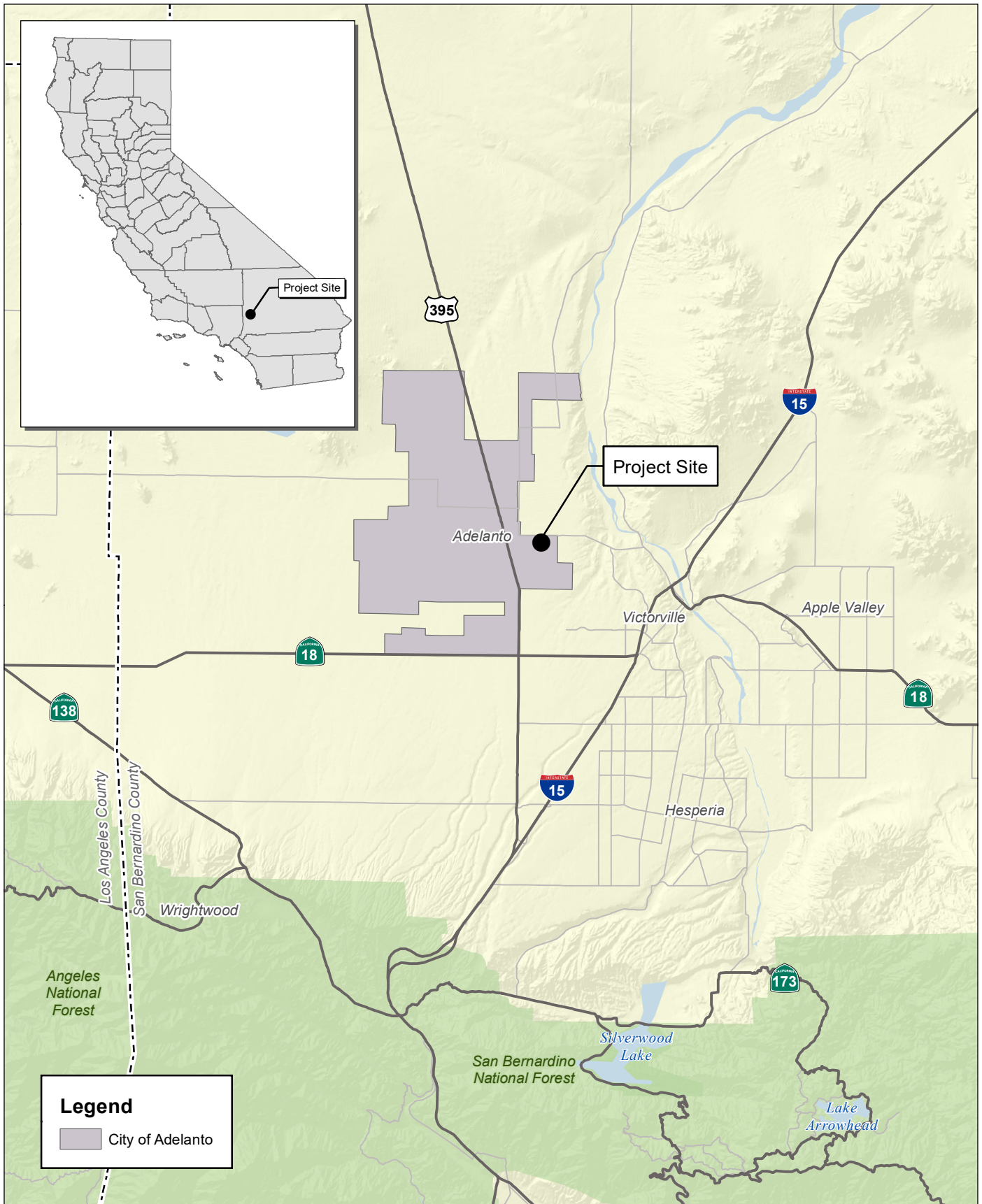
Subject: Joshua Tree Inventory Report for the Proposed Adelanto Gateway Logistics Center Project

INTRODUCTION

At the request of Mileski Living Trust C/O Synergy Consulting, FirstCarbon Solutions (FCS) conducted an inventory of western Joshua trees (*Yucca brevifolia*) at the proposed Adelanto Gateway Logistics Center Project (proposed project) located in the City of Adelanto in San Bernardino County, California. The inventory included a survey of the project site to search for western Joshua trees, record their locations, and perform measurements of their stems. This memorandum also includes a review of permitting needs for the Western Joshua Tree Conservation Act Incidental Take Permit (ITP) process.

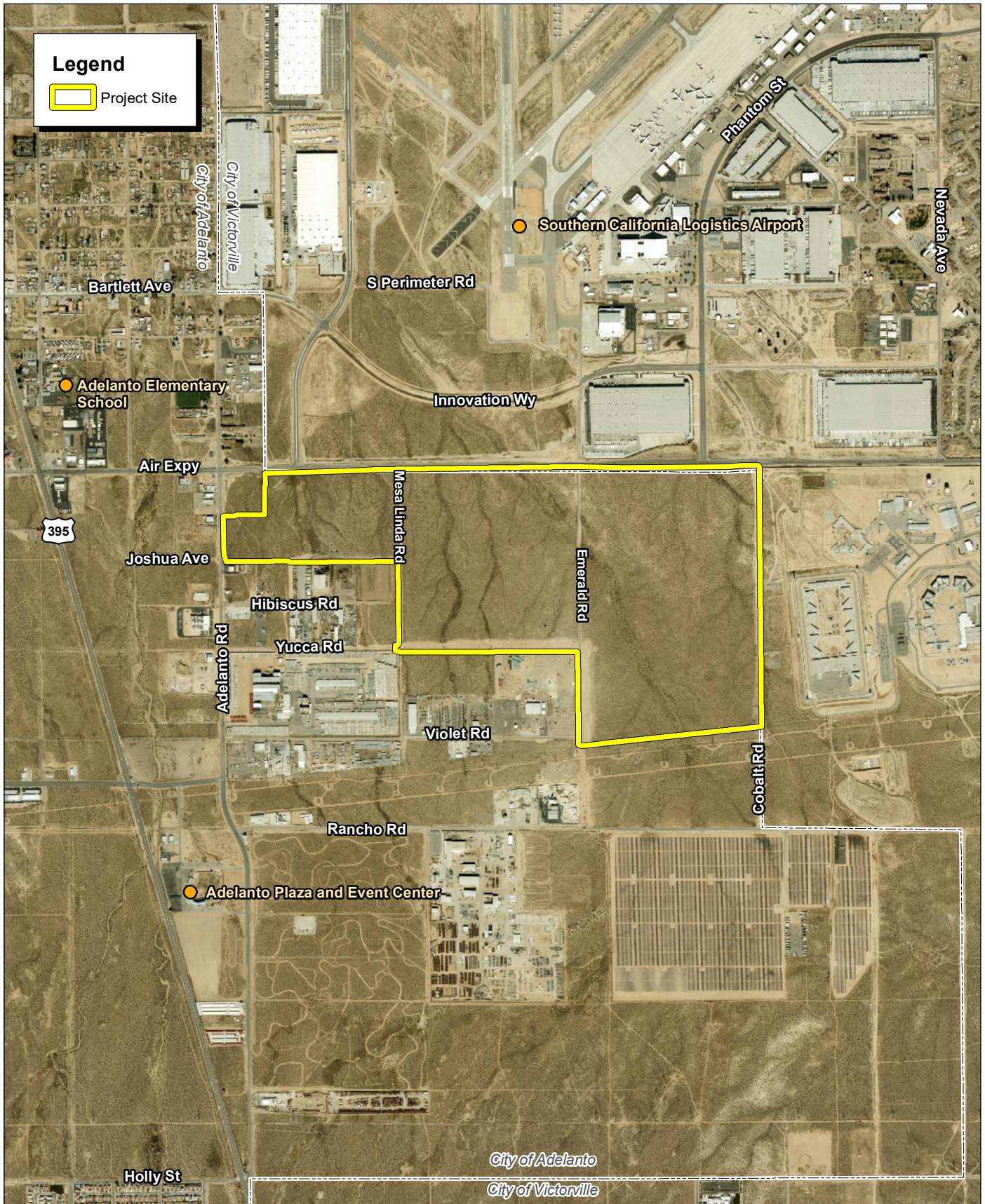
PROJECT LOCATION AND DESCRIPTION

The approximately 487.20-acre project site is located in the City of Adelanto, in San Bernardino County, California (Exhibit 1). The project site is centered around 34.568588° latitude and -117.387749° longitude. The location of the project site within the Mojave Desert region is shown on Exhibit 1, and the project site boundaries on a recent high-resolution aerial image are shown on Exhibit 2. The project site is located on the *Adelanto, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map, Township 6 North, Range 5 West, Section 34 (Exhibit 3). The project site comprises Assessor's Parcel Numbers (APNs): 0459-451-52 through -62 and 0459-841-01 through -19.



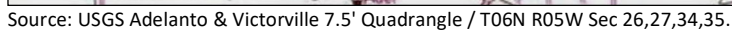
Source: Census 2000 Data, The California Spatial Information Library (CaSIL).





Source: ESRI Aerial Imagery. BLUE Engineering & Consulting, Inc.





The project site is situated in an area characterized by urban development, including the Federal Correctional Complex to the east of the site and several corporate businesses, including a trucking company, concrete company, and a diesel engine repair shop to the south. Additionally, a cannabis store, open land, and Adelanto Road are located to the west of the site and Air Expressway, the DHL Supply Chain, and the Southern California Logistics Airport are located to the north. However, undeveloped land is also present to the west, north, and east of the project site. Significant landmarks in the project vicinity include U.S. Route 395 located approximately 0.45 mile west and the Southern California Logistics Airport located approximately 0.34 mile north of the project site.

The proposed project would consist of an industrial distribution facility comprised of industrial warehouses and office space.

CONSERVATION STATUS OF WESTERN JOSHUA TREES

The California Game and Fish Commission received a petition from the Center for Biological Diversity to list the western Joshua tree under the California Endangered Species Act (CESA) on October 21, 2019. The Commission voted to accept the petition for consideration on September 22, 2020, thereby elevating the conservation status of the species to a Candidate for listing under CESA. As a Candidate species, it is afforded the same protections as species that are listed under CESA, including prohibitions of take. Project applicants are required under CESA to obtain an ITP from the California Department of Fish and Wildlife (CDFW) for impacts to western Joshua trees and their seedbanks.

Subsequently (in July 2023), the Western Joshua Tree Conservation Act (WJTCA) was signed into law, which prohibits unpermitted killing or removal of Joshua trees and establishes a fund to acquire and manage suitable habitat for the species. Project applicants are required to obtain an ITP through CDFW and, on a per-Joshua tree basis, pay an in lieu mitigation fee to the fund under the WJTCA. In lieu mitigation fees are assessed based on the height of the western Joshua trees and the area where they occur. Project applicants that obtain an ITP through the WJTCA are not required to obtain an ITP through CESA.

METHODS

FCS Biologists performed a survey of the project site to search for western Joshua trees. Survey transects were spaced at 10 meters, allowing for visual coverage of 100 percent of the project site. The Biologists collected tree measurement data and assessments of maturity and asexual reproduction. The location of each individual Joshua tree was recorded using ArcGIS Collector. The approximate height and canopy width of each tree was recorded using the Arboreal–Tree Height app. Each Joshua tree was assessed for clonal or asexual reproduction via rhizomes, branch sprouts, or basal sprouts, and each stem emerging from the ground was counted and measured.

RESULTS

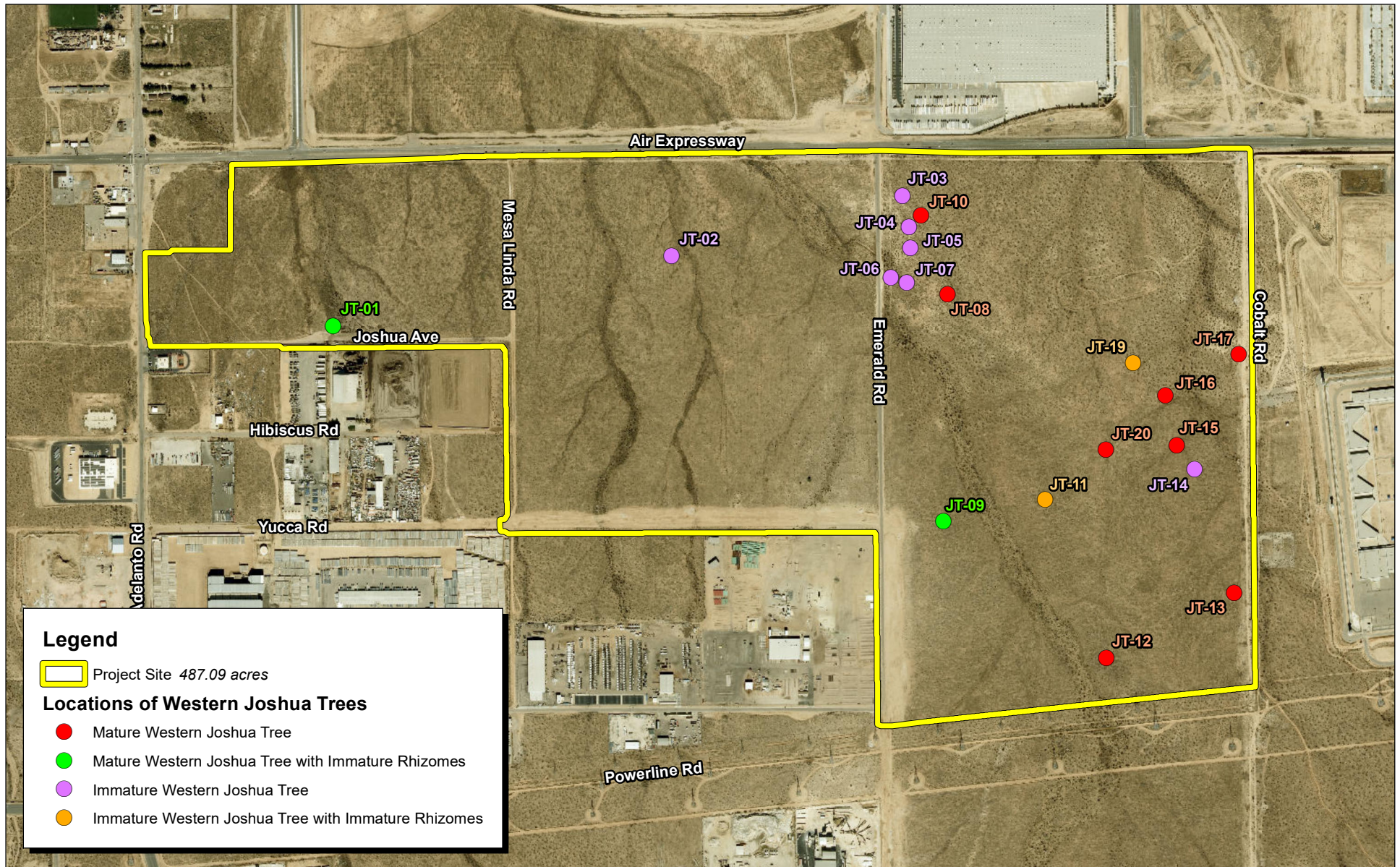
The FCS Biologist recorded a total of 19 live, genetically distinct western Joshua trees on the project site (Exhibit 4). Four of the western Joshua trees (JT-01, JT-09, JT-11, and JT-19) exhibit clonal growth, with 1 to 6 rhizomes per individual. Seven western Joshua trees (JT-02, JT-03, JT-04, JT-05, JT-06, JT-07, and JT-14) on the project site are immature single-trunk specimens; and two (JT-11 and JT-19) are immature specimens with immature rhizomes. Eight western Joshua trees (JT-08, JT-10, JT-12, JT-13, JT-15, JT-16, JT-17, and JT-20) are mature, single-trunk specimens; and two (JT-01 and JT-09) are mature specimens with immature rhizomes. A total of 36 stems, comprising trunks and rhizomes, were recorded on-site. Twenty western Joshua tree stems (trunks and rhizomes) are less than 1 meter in height (Size Class A); 14 stems are between 1 and 5 meters in height (Size Class B); and two stems are greater than 5 meters in height (Size Class C). Attributes of the western Joshua trees recorded on-site are provided in Attachment A. Photographs of the western Joshua trees recorded on-site are presented in Attachment B.

RECOMMENDATIONS FOR PERMITTING

The project applicant would be required to obtain an ITP from CDFW through the WJTCA process. The project site is located in the reduced fee area as defined in California Fish and Game Code Section 1927.3 (d), which specifies the following fees for take of western Joshua trees:

- A. One thousand dollars (\$1,000) for each western Joshua tree 5 meters or greater in height.
- B. Two hundred dollars (\$200) for each western Joshua tree 1 meter or greater but less than 5 meters in height.
- C. One hundred fifty dollars (\$150) for each western Joshua tree less than 1 meter in height.

These in lieu mitigation fees would be paid to the Western Joshua Tree Mitigation Fund. For the proposed project, FCS estimates that the in lieu mitigation fee would be \$7,800 for take of western Joshua trees on the project site. Prior to CDFW assessing the in lieu mitigation fees, the project applicant would be required to submit an ITP application form. The application form would require data collected by a Certified Arborist or a Biologist with expertise in western Joshua tree data recording. Although CDFW would process the ITP applications “as expeditiously as possible,” FCS estimates that the approval process could take as long as 6–12 months. When the application is approved, CDFW will invoice the project applicant with instructions for mailing a check for the in lieu mitigation fee to the corresponding CDFW Regional Office.



Source: ESRI Aerial Imagery. BLUE Engineering & Consulting, Inc.



Exhibit 4 Locations of Western Joshua Trees on the Project Site

Attachment A:

Western Joshua Tree Inventory

Western Joshua Tree Inventory and Attribute Table for the Adelanto Gateway Logistics Center Project

Tree ID	Latitude	Longitude	Size Class	Stem Length	Additional Notes
JT-01	34.568704	117.396082	A	1.14	Immature main trunk with 6 live immature rhizomes
JT-01a	34.568704	117.396082	A	0.27	Immature rhizome stem
JT-01b	34.568704	117.396082	A	0.22	Immature rhizome stem
JT-01c	34.568704	117.396082	A	0.28	Immature rhizome stem
JT-01d	34.568704	117.396082	A	0.23	Immature rhizome stem
JT-01e	34.568704	117.396082	A	0.85	Immature rhizome stem
JT-01f	34.568704	117.396082	A	0.23	Immature rhizome stem
JT-02	34.570037	117.387973	B	1.57	Immature single trunk
JT-03	34.571204	117.382437	B	2	Immature single trunk
JT-04	34.570589	117.382295	B	2.1	Immature single trunk
JT-05	34.570179	117.382265	B	2.4	Immature main trunk with 1 dead immature rhizome
JT-06	34.56981	117.382731	B	2.2	Immature single trunk
JT-07	34.569493	117.382352	A	0.57	Immature single trunk, most leaves yellowed
JT-08	34.569257	117.381383	B	3.1	Mature single trunk
JT-09	34.564748	117.381516	B	2.3	Mature main trunk with 5 live immature rhizomes
JT-09a	34.564748	117.381516	A	0.13	Immature rhizome stem
JT-09b	34.564748	117.381516	A	0.1	Immature rhizome stem
JT-09c	34.564748	117.381516	A	0.11	Immature rhizome stem
JT-09d	34.564748	117.381516	A	0.1	Immature rhizome stem
JT-09e	34.564748	117.381516	A	0.12	Immature rhizome stem
JT-10	34.570809	117.381998	B	3	Mature single trunk
JT-11	34.565166	117.379079	B	2.2	Immature main trunk with 4 live immature rhizomes
JT-11a	34.565166	117.379079	A	0.84	Immature rhizome stem
JT-11b	34.565166	117.379079	A	0.13	Immature rhizome stem
JT-11c	34.565166	117.379079	A	0.12	Immature rhizome stem
JT-11d	34.565166	117.379079	A	0.17	Immature rhizome stem

Tree ID	Latitude	Longitude	Size Class	Stem Length	Additional Notes
JT-12	34.562037	117.37764	C	6.1	Mature single trunk
JT-13	34.563303	117.37457	B	2.4	Mature single trunk
JT-14	34.565755	117.375499	B	2.3	Immature single trunk
JT-15	34.566222	117.375928	B	4.1	Dead main trunk with 1 live mature rhizome
JT-16	34.567214	117.376177	C	6.3	Mature single trunk
JT-17	34.568024	117.374424	B	3.6	Mature single trunk
JT-19	34.567871	117.376953	A	0.6	Immature main trunk with 2 live immature rhizomes
JT-19a	34.567871	117.376953	A	0.45	Immature rhizome stem
JT-19b	34.567871	117.376953	A	0.16	Immature rhizome stem
JT-20	34.566152	117.377622	B	3.4	Mature single trunk

Attachment B:

Western Joshua Tree Photographs



Photograph 1: Western Joshua tree JT-01 with rhizome stems 01a, 01b, 01c, 01d, 01e, and 01f



Photograph 2: Western Joshua tree JT-02



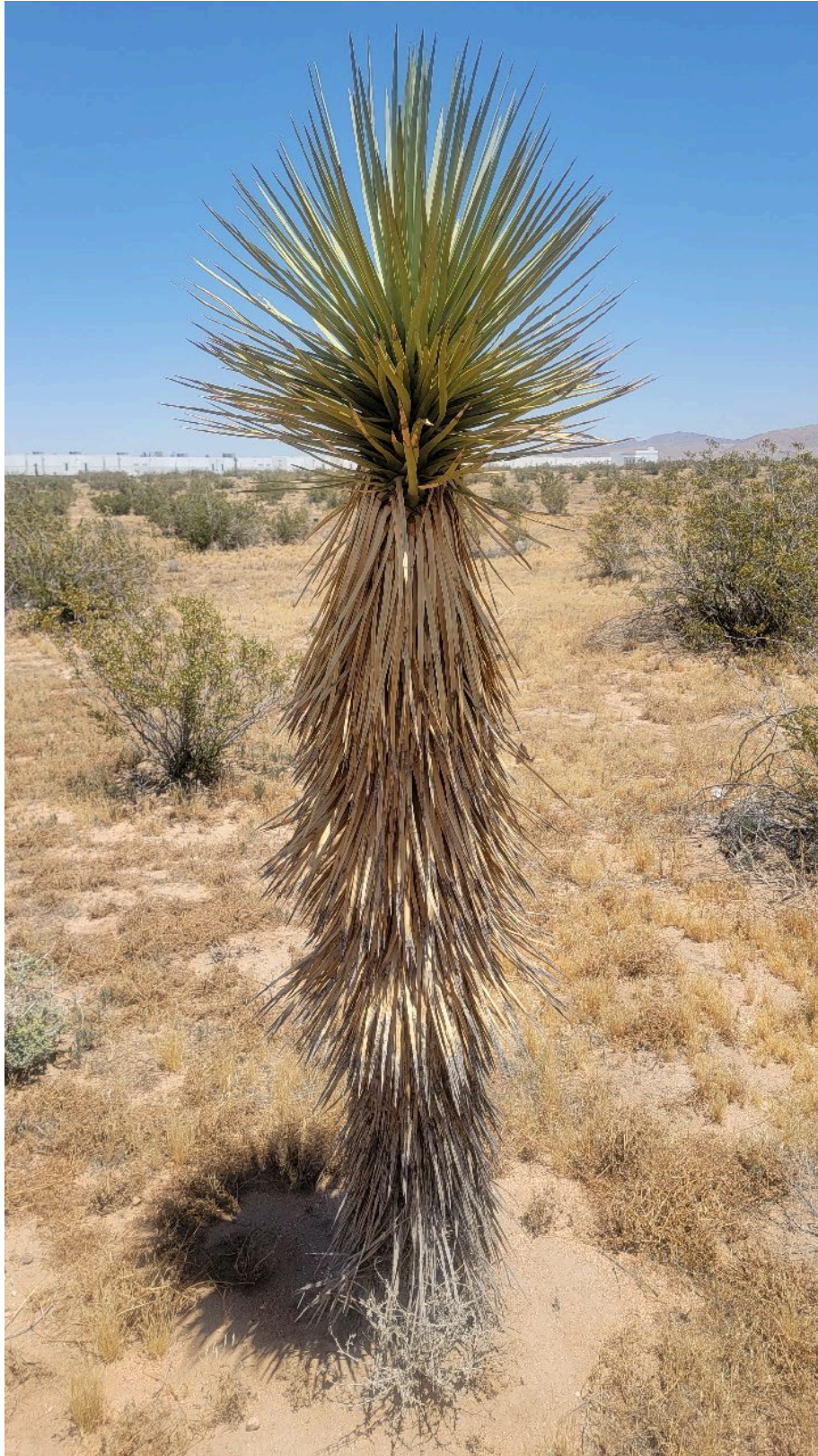
Photograph 3: Western Joshua tree JT-03



Photograph 4: Western Joshua tree JT-04



Photograph 5: Western Joshua tree JT-05



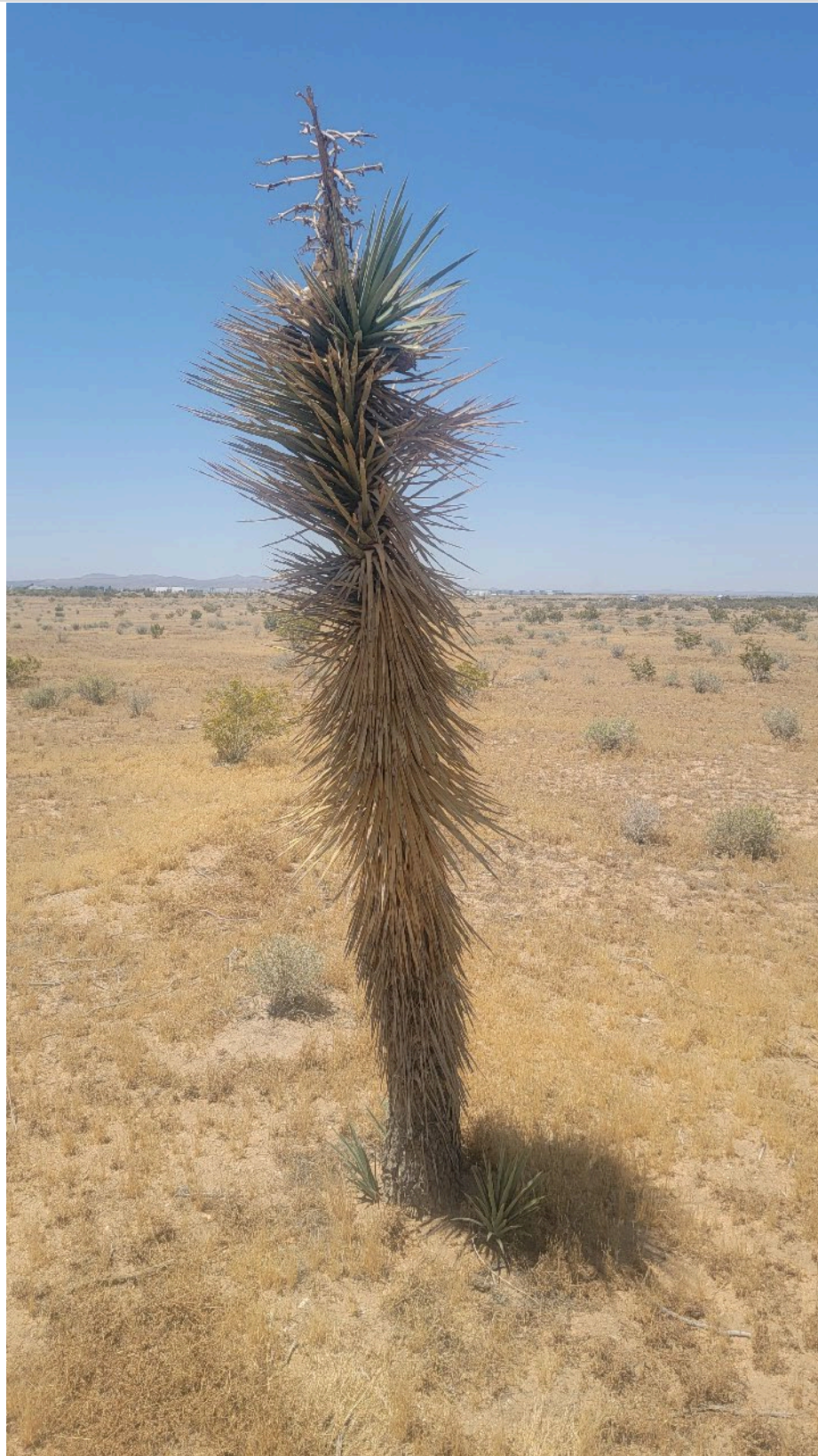
Photograph 6: Western Joshua tree JT-06



Photograph 7: Western Joshua tree JT-07



Photograph 8: Western Joshua tree JT-08



Photograph 9: Joshua Tree JT-09 with rhizome stems 09a, 09b, 09c, 09d, and 09e



Photograph 10: Western Joshua tree JT-10



Photograph 11: Western Joshua tree JT-11 with rhizome stems 11a, 11b, 11c, and 11d



Photograph 12: Western Joshua tree JT-12



Photograph 13: Western Joshua tree JT-13



Photograph 14: Western Joshua tree JT-14



Photograph 15: Western Joshua tree JT-15



Photograph 16: Western Joshua tree JT-16



Photograph 17: Western Joshua tree JT-17



Photograph 18: Western Joshua tree JT-19



Photograph 19: Western Joshua tree JT-20

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