ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

October 28, 2020

Mr. Manny Bediola
Trinity Alliance
10803 Foothill Boulevard, Suite 212
Rancho Cucamonga, CA 91730
Via email: manuel@trinitya7.com

RE: UPDATED Biological Resources Assessment in Support of the Trinity Redevelopment Tract 18305 Project at the Intersection of Vista Grove Street and Hermosa Avenue in the City of Rancho Cucamonga, San Bernardino County, California

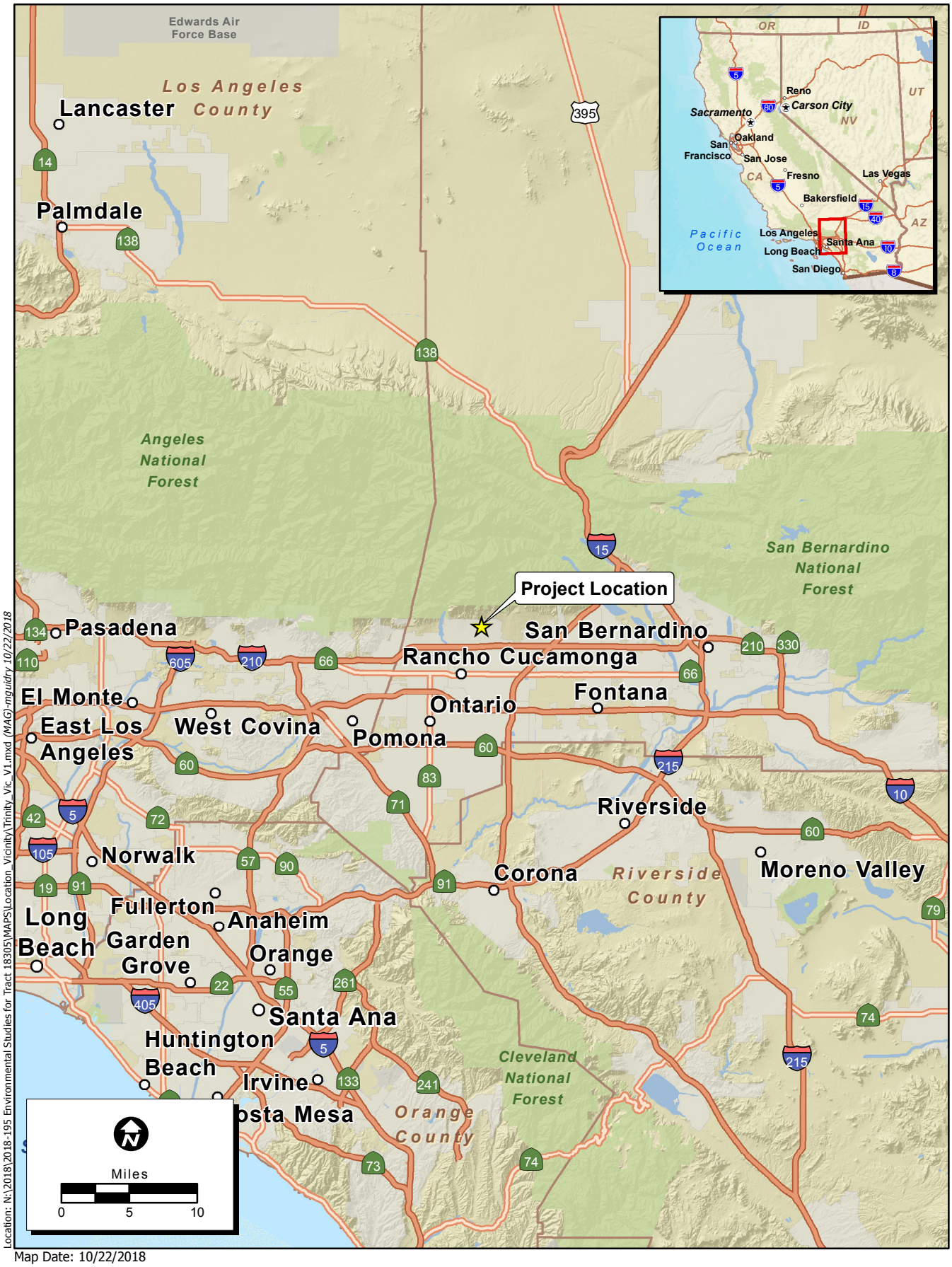
Dear Mr. Bediola:

This letter report provides the results of an updated biological reconnaissance survey of the Trinity Redevelopment Tract 18305 Project (Project) located in Rancho Cucamonga, California. The current survey was conducted by ECORP Consulting, Inc. as an update to a previous biological reconnaissance survey conducted in October 2018, as requested by the City of Rancho Cucamonga. This letter report is intended to be a supplement to the 2018 biological technical report prepared by ECORP (2018), which is included as Attachment A for reference. The Project site consists of ±4.0 acres of undeveloped land immediately southwest of the intersection of Hermosa Avenue and Vista Grove Street (Project site) in the City of Rancho Cucamonga in San Bernardino County, California. The Project site was surveyed to identify any biological resources that could be affected by the proposed Project, pursuant to the terms of the California Environmental Quality Act (CEQA) and for the purposes of identifying any biological constraints that would affect the site plan for the Project. The Project will be subject to county, state, and federal regulations regarding compliance with the federal Endangered Species Act (ESA), California ESA, Migratory Bird Treaty Act (MBTA), and California Fish and Game Code.

Project Location

The Project area is located on an ±4.0-acre parcel located on mostly undeveloped former agricultural land, west of Hermosa Avenue, and south of an unpaved portion of Vista Grove Street in the City of Rancho Cucamonga (Figure 1). The Project site is bounded by a San Bernardino County Flood Control District access road to the north, residential housing to the east and west, and an equine boarding and training facility to the south. In 2018, the Project site consisted of mostly undeveloped former agriculture land with a small house/outbuilding identified onsite. The Project site is currently being temporarily utilized as an extension of the adjacent equestrian boarding and training facility. Surrounding land uses consist mainly of residential and commercial developments. The Project site, as depicted on the United States Geological Survey Cucamonga Peak 7.5-minute topographic quadrangle, lies within Section 23 of Township 1 North, Range 7 West, San Bernardino Baseline and Meridian (Figure 2). The elevation of the Project site is approximately 1,925 feet above mean sea level.

●215 North Fifth Street ● Redlands, California 92374 ● Phone: (909) 307-0046 ● Fax: (909) 307-0056 ●Web: www.ecorpconsulting.com



Location: N:\2018\2018-195 Environmental Studies for Tract 18305\MAPS\Location_Vicinity\Trinity_Vic_V1.mxd (MAG)-mguidry 10/22/2018

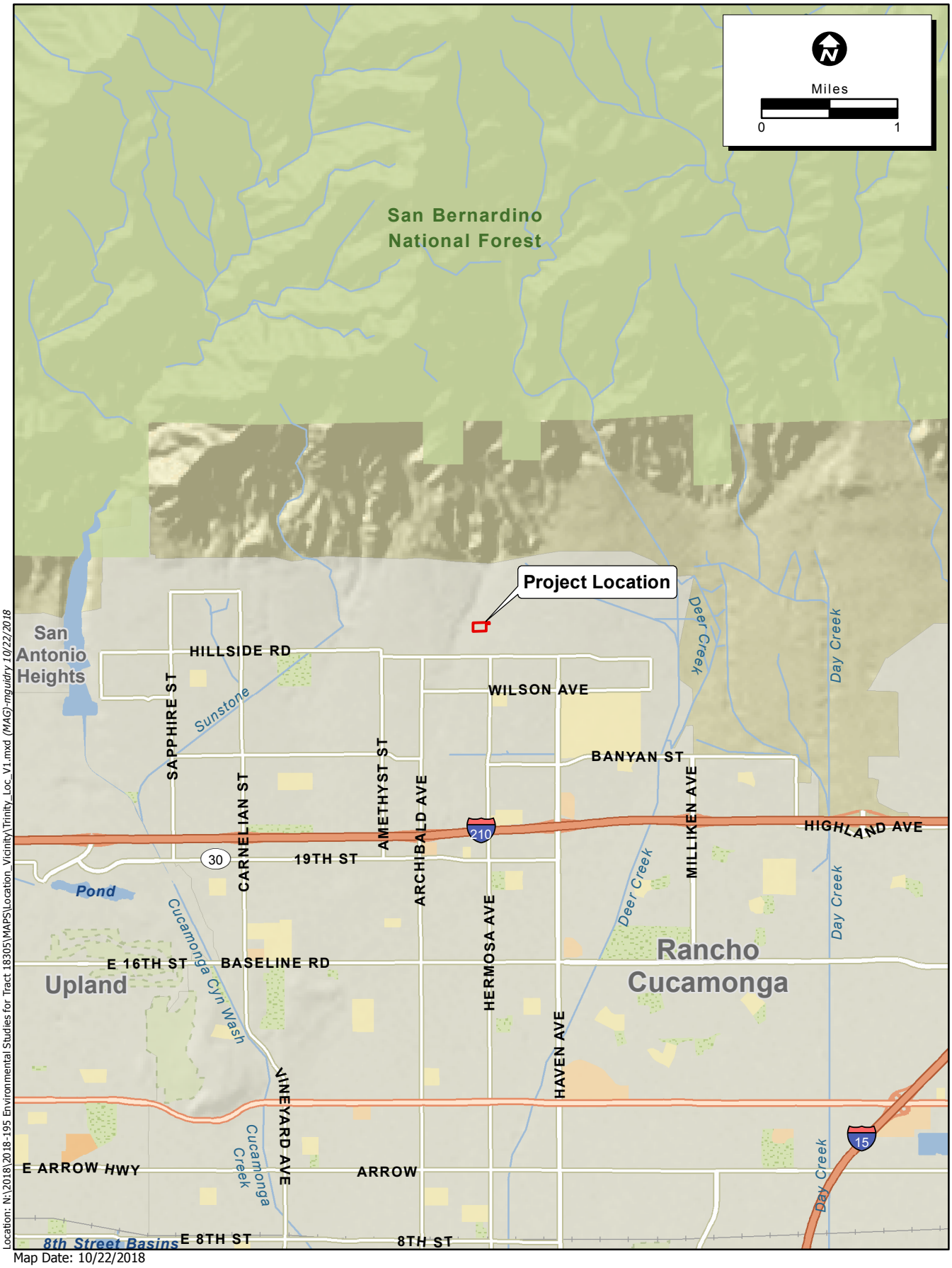
Map Date: 10/22/2018

Service Layer Credits: Sources: Esri, USGS, NOAA

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

Figure 1. Project Vicinity Map

2018-195 Environmental Studies for Tract 18305



Location: N:\2018\2018-195 Environmental Studies for Tract 18305\MAPS\Location_Vicinity\Trinity_Loc_V1.mxd (MAG)-mguidry 10/22/2018

Map Date: 10/22/2018
Source: ESRI

Figure 2. Project Location

2018-195 Environmental Studies for Tract 18305

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

Methods

An updated literature review and database search was conducted using California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB; CDFW 2020) and the California Native Plant Society (CNPS) Electronic Inventory (CNPS 2020) was performed before the survey was conducted to determine if any new special-status plant or wildlife species had been recorded on the property or surrounding area since the last survey.

Following the database searches, a biological reconnaissance survey was conducted by walking along the Project site boundary to determine the vegetation communities and wildlife habitats on the Project site. Inaccessible areas were surveyed using binoculars. The biologist documented the plant and animal species present on the Project site, and the location and condition of the Project site were assessed for the potential to provide habitat for special-status plant and wildlife species. Data were recorded on a Global Positioning System (GPS) unit, field notebooks, and/or maps. Photographs were also taken during the survey to provide a visual representation of the various vegetation communities on the Project site. The Project site was also examined to assess its potential to facilitate wildlife movement or function as a movement corridor for wildlife moving through the region.

In instances where a special-status species was observed, the date, species, location and habitat, and GPS coordinates were recorded. The locations of special-status species observations were recorded using a handheld GPS in NAD 83, Universal Transverse Mercator coordinates, Zone 11S.

Results

The CNDDB and CNPS Electronic Inventory searches were conducted on September 29, 2020. The database searches identified 58 special-status plant species and 45 special-status wildlife species that could occur on and/or near the Project site. A list was generated from the results of the literature review and the Project site was evaluated for suitable habitat that could support any of the special-status plant or wildlife species on the list. Additionally, prior to conducting the survey, the biologists reviewed the results of the previous biological survey and coordinated with the previous biologist who conducted the 2018 initial survey.

ECORP biologist Alexandra Dorough conducted the survey on October 2, 2020. Survey time and weather conditions are provided in Table 1.

Table 1. Weather Conditions During Field Survey

Date	Surveyors	Time		Temperature (°F)		Cloud Cover (%)		Wind Speed (mph)	
		Start	End	Start	End	Start	End	Start	End
10/02/2020	Alexandra Dorough	1045	1130	90	91	0	0	0-1	0-1

The results of the updated biological reconnaissance survey were generally consistent with results of the 2018 survey. However, the site utilization and characteristics have substantially changed. The 2018 survey found that the Project site consisted of mostly undeveloped former agriculture land with a small house/

outbuilding identified onsite. However, the current survey revealed that the Project site is being temporarily utilized as an extension of the adjacent equestrian boarding and training facility. The Project site was bordered by stable fencing with storage bins, compost piles, domestic horses, and vehicles within the fence line. An abandoned boat was observed within the vegetation outside of the fence line. The Project site remains very disturbed with most of the vegetation on the Project site consisting of nonnative grasses and forbs known to persist in disturbed areas, which is consistent with the 2018 survey. There were no special-status species observed or detected during the updated biological reconnaissance survey. Representative site photos from the biological survey are provided in Attachment B.

Discussion

The Project site, consisting mainly of disturbed or developed land currently being used as an equestrian boarding facility, was devoid of native vegetation communities. Minor amounts of trash, including drink containers, pieces of concrete, and scrap wood were found scattered throughout the site and adjacent to the Project site.

The literature review and database searches identified 58 special-status plant species that occur near the Project site; but due to elevational factors, the Project site's history of being heavily disturbed, developed, disced, and the current lack of suitable habitat for special-status plant species on Project site, all of the special-status plant species identified in the literature review were presumed absent from the Project site. Therefore, the removal of ±4.0 acres of disturbed and developed land on the Project site will not contribute to the overall decline of any of the plant species identified in the literature review and database searches. No impacts to special-status plant species are anticipated to result from the development of this Project.

The literature review and database searches identified 45 special-status wildlife species that occur near the Project site; however, based on the condition of the Project site, the Project site's history of being heavily disturbed, developed, disced, and the current lack of suitable habitat for special-status wildlife species on the Project site, all of the special-status wildlife species identified in the literature review were presumed absent from the Project site. Therefore, the removal of ±4.0 acres of disturbed and developed land on the Project site will not contribute to the overall decline of any of the wildlife species identified in the literature review and database searches. No impacts to special-status wildlife species are expected to result from the development of this Project with the current land uses and conditions observed on the Project site. However, if the equestrian facility were to stop utilizing all or portions of the Project site and due to its highly mobile nature, there is potential for burrowing owl (*Athene cunicularia*) to use the site before the start of construction due to the presence of open areas. In order to prevent potential impacts to burrowing owl in the form of injury, mortality from entombing, and loss of habitat to a less than significant level, it is recommended that Mitigation measure BIO-1 be implemented.

The trees on and immediately adjacent to the Project site could provide nesting habitat for nesting birds and raptors protected by the MBTA and California Fish and Game Code. If construction of the proposed Project occurs during the bird breeding season (typically February 1 through August 31), ground-disturbing construction activities could directly affect birds protected by the MBTA and their nests through the removal of habitat on the Project site and indirectly through increased noise, vibrations, and

increased human activity. Impacts to nesting birds would be less than significant with the implementation of Mitigation Measure BIO-2.

No federally or state-listed species are expected to occur on the Project site. Therefore, it is not likely that the Project will need to acquire a mechanism for "take" of federally or state-listed plant or wildlife species.

The following mitigation measures are recommended prior to Project implementation:

BIO-1: **Pre-Construction Burrowing Owl Survey:** A pre-construction survey for burrowing owls shall be completed within the Project site between 14 and 30 days prior to construction activities in accordance with the CDFW *Staff Report on Burrowing Owl Mitigation* (2012). A second pre-construction survey shall be conducted no more than 24 hours prior to the start of construction. If burrowing owls are observed during either of the preconstruction surveys, implementation of additional measures may be necessary to reduce impacts to a level that is less than significant, including seasonal work restrictions, no-work buffers established around active burrows, passive relocation of burrowing owls, and/or a specific mitigation methodology determined in coordination with CDFW.

BIO-2: **Pre-Construction Nesting Bird Survey:** If construction or other Project activities are scheduled to occur during the bird breeding season (February through August for raptors and March through August for most migratory bird species), a pre-construction nesting bird survey shall be conducted by a qualified biologist to ensure that active bird nests will not be disturbed or destroyed. The survey shall be completed no more than three days prior to initial ground disturbance. The nesting bird survey shall include the Project site and adjacent areas where Project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. If an active nest is identified, a qualified biologist shall establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance limit buffer zones until the nest has fledged or has been deemed inactive by the qualified biologist. If appropriate, the pre-construction nesting bird survey can be performed concurrently with the 24-hour pre-construction burrowing owl survey described in BIO-1.

The following best management practices are not mitigation measures pursuant to CEQA but are recommended to further reduce impacts to special-status species that have potential to occur on the property:

- Confine all work activities to a pre-determined work area;
- To prevent inadvertent entrapment of wildlife during the construction phase of a Project, all excavated, steep-walled holes or trenches more than two feet deep should be covered at the close of each working day by plywood or similar materials. If the trenches cannot be closed, one or more escape ramps constructed of earthen fill or wooden planks shall be installed. Before such holes or trenches are filled, they should be thoroughly inspected for trapped animals;
- Wildlife are often attracted to burrow- or den-like structures, such as pipes and may enter stored pipes and become trapped or injured. To prevent wildlife use of these structures, all construction

pipes, culverts, or similar structures with a diameter of four inches or greater should be capped while stored onsite;

- All food-related trash items such as wrappers, cans, bottles, and food scraps should be disposed of in securely closed containers and removed at least once a week from a construction or Project site

If you have any questions regarding the content of this letter report, please contact me at (909) 307-0046.

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

SIGNED:  October 28, 2020

Kristen M. Wasz
Inland Empire Biology Manager
Senior Biologist
ECORP Consulting, Inc.
215 N 5th St.
Redlands, CA 92374

Date

Attachments:

Attachment A: 2018 Biological Technical Report for the Trinity Redevelopment Tract 18305
Attachment B: Representative Site Photos

Literature Cited

CDFW. 2020. RareFind California Department of Fish and Game Natural Diversity Database (CNDDB). California. Sacramento, CA, California Department of Fish and Wildlife, Biogeographic Data Branch.

CNPS, Rare Plant Program. 2020. Inventory of Rare and Endangered Plants (online edition, v8-03 0.39). California Native Plant Society, Sacramento, CA. Website http://www.rareplants.cnps.org. Accessed: September 2020.

ECORP Consulting, Inc. 2018. *Biological Technical Report for the Trinity Redevelopment Tract 18305, City of Rancho Cucamonga, CA*.

[USFWS] United States Fish and Wildlife Service 1918. Migratory Bird Treaty Act. Section 16 of the U.S. Code (703-712), as amended 1989.

ATTACHMENT A

2018 Biological Technical Report for the Trinity Redevelopment Tract 18305

Biological Technical Report

Trinity Redevelopment Tract 18305, City of Rancho Cucamonga

San Bernardino County, California

Prepared For:

Trinity Redevelopment
10803 Foothill Blvd, Suite 212
Rancho Cucamonga, CA 91730

Prepared By:

Phillip Wasz

Senior Biologist
ECORP Consulting, Inc.
215 North 5th Street
Redlands, California 92374

Under the direction of Principal Biologist:

Donald R. Mitchell

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

ECORP Consulting, Inc. has assisted public and private land owners with environmental regulation compliance since 1987. We offer full service capability, from initial baseline environmental studies through environmental planning review, permitting negotiation, liaison to obtain legal agreements, mitigation design, construction monitoring, and compliance reporting.

Citation: ECORP Consulting, Inc. 2018. Biological Technical Report for the Cactus Trail Improvements Project, City of Rialto. San Bernardino County, California. Prepared for KOA Corporation.

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF APPENDICES

1.0 INTRODUCTION

ECORP Consulting, Inc. (ECORP) conducted a biological reconnaissance survey for Trinity Redevelopment Tract 18305 Project (Project). The Project site consists of approximately 4.0 acres of undeveloped land immediately southwest of the intersection of Hermosa Avenue and Vista Grove Street (Project site) in the City of Rancho Cucamonga, San Bernardino County, California. The Project site was surveyed to identify any biological resources that could be affected by the proposed Project, pursuant to the terms of the California Environmental Quality Act (CEQA) and for the purposes of identifying any biological constraints that would affect the site plan for the Project. The Project will be subject to county, state, and federal regulations regarding compliance with the federal Endangered Species Act (ESA), California ESA, Migratory Bird Treaty Act (MBTA), and California Fish and Game Code.

1.1 Location and Setting

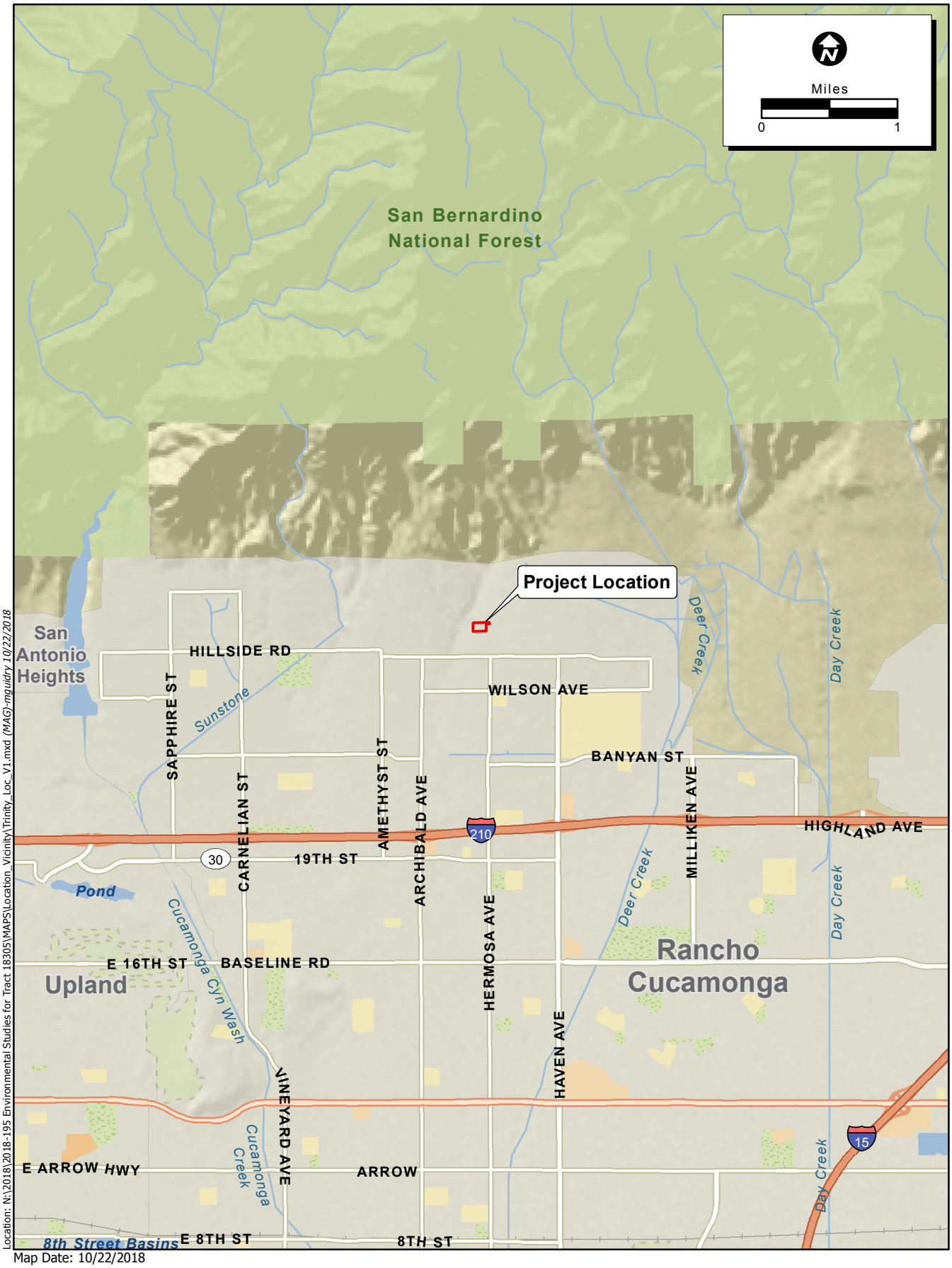
The Project area is located on an approximately 4.0-acre parcel located on mostly undeveloped former agricultural land, west of Hermosa Avenue, and south of an unnamed, unpaved road in the City of Rancho Cucamonga (Figure 1). The Project site is bounded by a San Bernardino County Flood Control District (SBCFCD) access road to the north, residential housing to the east and west, and an equine boarding and training facility to the south. The Project site contains one structure, a small house, located in the southeast corner. Surrounding land uses consist mainly of residential and commercial developments. The Project site, as depicted on the United States Geological Survey (USGS) Cucamonga Peak 7.5-minute topographic quadrangle, lies within Section 23 of Township 1 North, Range 7 West, San Bernardino Baseline and Meridian (Figure 2). The elevation of the Project site is approximately 1,925 feet above mean sea level.

1.2 Project Description and Purpose

Trinity Redevelopment proposes to subdivide the existing 4.0-acre parcel into six single-family residential lots. The development will include extending Vista Grove Street west, across Hermosa Ave, for approximately 380 feet, which will turn south into a cul-de-sac surrounded by the proposed single-family residences. Construction of the Vista Grove Street extension will result in removal of the SBFCD access gate, which will be replaced just to the west of the road extension. A 15-foot wide equestrian trail easement will be created along the eastern and southern boundaries of the Project site, connecting to the existing equestrian trail west of the Project site. Access to the equestrian trail will come from the southwest corner of the new Hermosa Avenue and Vista Grove Street intersection.

1.0 SPECIAL-STATUS SPECIES REGULATIONS

The biological reconnaissance survey was conducted to identify potential issues and ensure compliance with state and federal regulations regarding listed, protected, and sensitive species. The Project will be subject to the regulations detailed below.



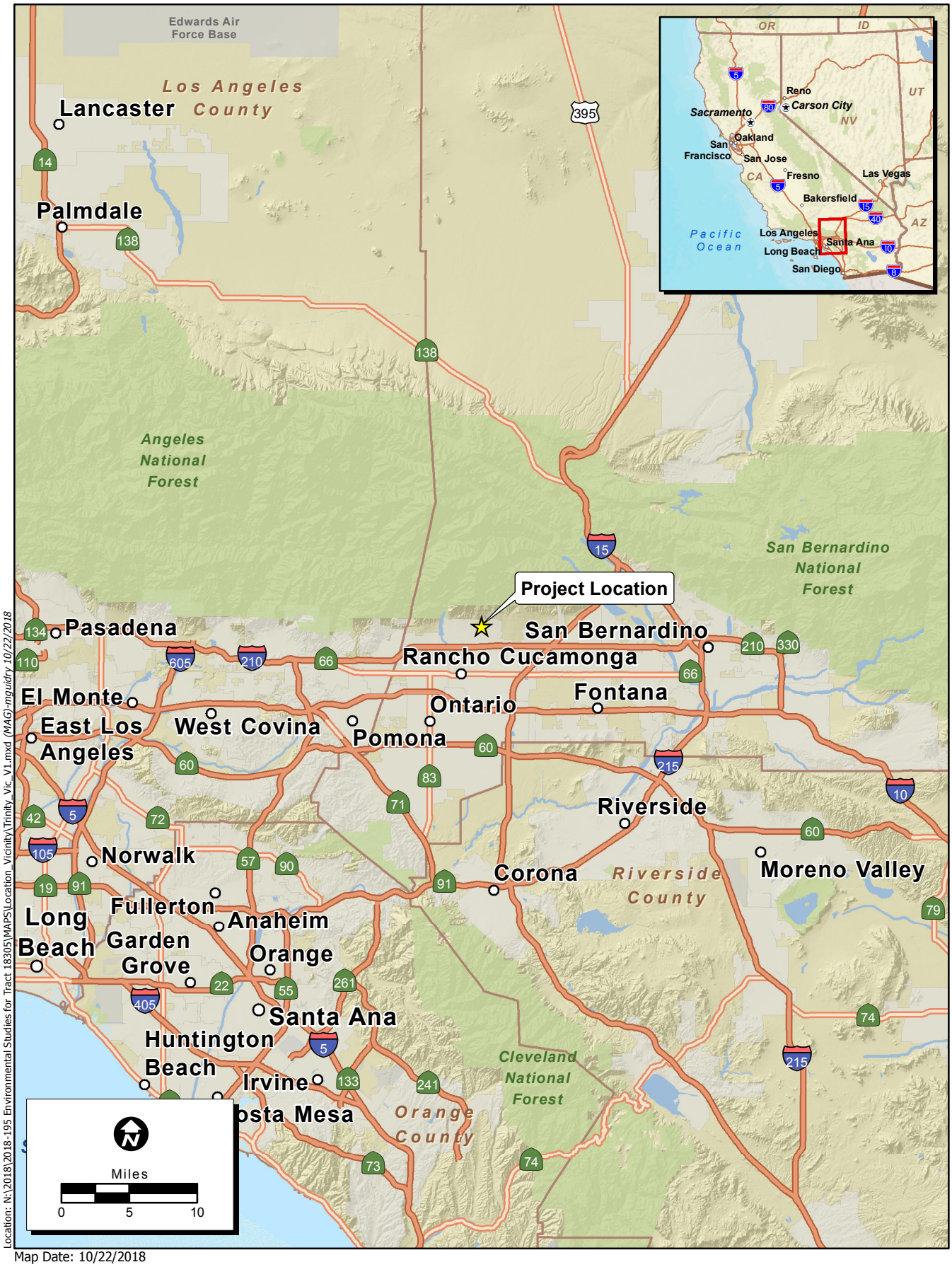
Location: N:\2018\2018-195 Environmental Studies for Tract 18305\MAPS\Location_Vicinity\Trinity_Loc_V1.mxd (MAG)-mguidry 10/22/2018

Map Date: 10/22/2018
Source: ESRI

Figure 1. Project Location

2018-195 Environmental Studies for Tract 18305

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS



Location: N:\2018\2018-195 Environmental Studies for Tract 18305\MAPS\Location_Vicinity\Trinity_Vic_V1.mxd (MAG)-mguidry 10/22/2018

Map Date: 10/22/2018

Service Layer Credits: Sources: Esri, USGS, NOAA

Figure 2. Project Vicinity Map

2018-195 Environmental Studies for Tract 18305

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

1.1 Federal Regulations

1.1.1 The Federal Endangered Species Act

The ESA protects plants and animals that are listed as endangered or threatened by the United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service. Section 9 of the ESA prohibits the taking of endangered wildlife, where taking is defined as "*harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct*" (50 Code of Federal Regulations [CFR] 17.3). For plants, this statute governs removing, possessing, maliciously damaging, or destroying any endangered plant on federal land and removing, cutting, digging up, damaging, or destroying any endangered plant on non-federal land in knowing violation of state law (16 U.S. Code 1538). Under Section 7 of the ESA, federal agencies are required to consult with the USFWS if their actions, including permit approvals or funding, could adversely affect a listed (or proposed) species (including plants) or its critical habitat. Through consultation and the issuance of a biological opinion, the USFWS may issue an incidental take statement allowing take of the species that is incidental to an otherwise authorized activity provided the activity will not jeopardize the continued existence of the species. Section 10 of the ESA provides for issuance of incidental take permits where no other federal actions are necessary provided a habitat conservation plan (HCP) is developed.

1.1.2 Migratory Bird Treaty Act

The MBTA implements international treaties between the United States and other nations devised to protect migratory birds, any of their parts, eggs, and nests from activities including hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit (USFWS 1918). As authorized by the MBTA, the USFWS issues permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (rehabilitation, education, migratory game bird propagation, and salvage), take of depredating birds, taxidermy, and waterfowl sale and disposal. The regulations governing migratory bird permits can be found in 50 CFR Part 13 General Permit Procedures and 50 CFR Part 21 Migratory Bird Permits. The State of California has incorporated the protection of birds of prey in Sections 3800, 3513, and 3503.5 of the California Fish and Game Code.

1.1.3 Federal Clean Water Act

The federal Clean Water Act's (CWA) purpose is to "*restore and maintain the chemical, physical, and biological integrity of the nation's waters.*" Section 404 of the CWA prohibits the discharge of dredged or fill material into Waters of the United States (U.S.) without a permit from the U.S. Army Corps of Engineers (USACE). The definition of Waters of the U.S. includes rivers, streams, estuaries, the territorial seas, ponds, lakes, and wetlands. Wetlands are defined as those areas "*that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions*" (33 CFR 328.3 7b). The U.S. Environmental Protection Agency acts as a cooperating agency to set policy, guidance and criteria for use in evaluation permit applications and also reviews USACE permit applications.

The USACE regulates "fill" or dredging of fill material within its jurisdictional features. "Fill material" means any material used for the primary purpose of replacing an aquatic area with dry land or changing the

bottom elevation of a water body. Substantial impacts to wetlands may require an individual permit. Projects that only minimally affect wetlands may meet the conditions of one of the existing Nationwide Permits. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions; this certification or waiver is issued by the State Water Quality Control Board, administered by each of nine California Regional Water Quality Control Boards.

1.2 State and Local Regulations

1.2.1 California Endangered Species Act

The California ESA generally parallels the main provisions of the ESA but, unlike its federal counterpart, the California ESA applies the take prohibitions to species proposed for listing (called "candidates" by the state). Section 2080 of the California Fish and Game Code prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or in the regulations. Take is defined in Section 86 of the California Fish and Game Code as "*hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill*." The California ESA allows for take incidental to otherwise lawful development projects. State lead agencies are required to consult with California Department of Fish and Wildlife (CDFW) to ensure that any action they undertake is not likely to jeopardize the continued existence of any endangered or threatened species or result in destruction or adverse modification of essential habitat.

1.2.2 Fully Protected Species

The State of California first began to designate species as "fully protected" prior to the creation of the federal and California ESAs. Lists of fully protected species were initially developed to provide protection to those animals that were rare or faced possible extinction, and included fish, amphibians and reptiles, birds, and mammals. Most fully protected species have since been listed as threatened or endangered under federal and/or California ESAs. The regulations that implement the Fully Protected Species Statute (California Fish and Game Code § 4700) provide that fully protected species may not be taken or possessed at any time. Furthermore, CDFW prohibits any state agency from issuing incidental take permits for fully protected species, except for necessary scientific research.

1.2.3 Native Plant Protection Act

The Native Plant Protection Act (NPPA) of 1977 (California Fish and Game Code §§ 1900-1913) was created with the intent to "*preserve, protect and enhance rare and endangered plants in this State*." The NPPA is administered by CDFW. The Fish and Wildlife Commission has the authority to designate native plants as "endangered" or "rare" and to protect endangered and rare plants from take. The California ESA of 1984 (California Fish and Game Code § 2050-2116) provided further protection for rare and endangered plant species, but the NPPA remains part of the California Fish and Game Code.

1.2.4 California Fish and Game Code

Streambed Alteration Agreement

Section 1602 of the California Fish and Game Code requires that a Notification of Lake or Streambed Alteration be submitted to CDFW for "*any activity that may substantially divert or obstruct the natural flow*

or substantially change the bed, channel, or bank of any river, stream, or lake." The CDFW reviews the proposed actions and, if necessary, submits to the Applicant a proposal for measures to protect affected fish and wildlife resources. The final proposal that is mutually agreed upon by CDFW and the Applicant is the Streambed Alteration Agreement (SAA). Often, projects that require an SAA also require a permit from the USACE under Section 404 of the CWA. In these instances, the conditions of the Section 404 permit and the SAA may overlap.

Migratory Birds

The CDFW enforces the protection of nongame native birds in §§ 3503, 3503.5, and 3800 of the California Fish and Game Code. Section 3513 of the California Fish and Game Code prohibits the possession or take of birds listed under the MBTA. These sections mandate the protection of California nongame native birds' nests and make it unlawful to take these birds. All raptor species are protected from "take" pursuant to California Fish and Game Code § 3503.5 and are also protected at the federal level by the MBTA of 1918.

1.2.5 CEQA Significance Criteria

Section 15064.7 of the CEQA Guidelines encourages local agencies to develop and publish the thresholds the agency uses in determining the significance of environmental effects caused by projects under its review. However, agencies may also rely upon the guidance provided by the expanded Initial Study checklist contained in Appendix G of the CEQA Guidelines. Appendix G provides examples of impacts that would normally be considered significant. Based on these examples, impacts to biological resources would normally be considered significant if the project would:

- have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
- have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS;
- have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, and coastal) through direct removal, filling, hydrological interruption, or other means;
- interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and
- conflict with the provisions of an adopted HCP, Natural Community Conservation Plan (NCCP), or other approved local, regional or state HCP.

An evaluation of whether an impact on biological resources would be substantial must consider both the resource itself and how that resource fits into a regional or local context. Substantial impacts would be

those that would diminish, or result in the loss of, an important biological resource, or those that would obviously conflict with local, state, or federal resource conservation plans, goals, or regulations. Impacts are sometimes locally important but not significant according to CEQA. The reason for this is that although the impacts would result in an adverse alteration of existing conditions, they would not substantially diminish, or result in the permanent loss of an important resource on a population-wide or region-wide basis.

2.0 METHODS

2.1 Literature Review

Prior to conducting the biological reconnaissance survey, an ECORP biologist performed literature review and database searches using the CDFW's California Natural Diversity Database (CNDDB; CDFW 2018a) and the California Native Plant Society's (CNPS) Electronic Inventory (CNPSEI; CNPS 2018) to determine the special-status plant and wildlife species that have been documented near the Project site. ECORP searched CNDDB and CNPSEI records within the Project site boundaries as depicted on USGS 7.5-minute Cucamonga Peak topographic quadrangle, plus the surrounding eight topographic quadrangles, including Mount San Antonio, Telegraph Peak, Cajon, Mount Baldy, Devore, Ontario, Guasti, and Fontana. The CNDDB and CNPSEI contain records of reported occurrences of federally or state-listed endangered, threatened, proposed endangered or threatened species, California Species of Special Concern (SSC), and/or other special-status species or habitat that may occur within or near the Project. Additional information was gathered from the following sources and includes, but is not limited to:

- Natural Resources Conservation Service *Web Soil Survey* (NRCS 2018);
- *State and Federally Listed Endangered and Threatened Animals of California* (CDFW 2018b);
- *Special Animals List* (CDFW 2018c);
- *The Jepson Manual* (Hickman 1993);
- *The Manual of California Vegetation*, 2nd Edition (Sawyer et al. 2009); and
- various online websites (e.g., Calflora 2018).

Using this information and observations in the field, a list of special-status plant and animal species that have potential to occur on or near the Project site was generated. For the purposes of this assessment, special-status species are defined as plants or animals that:

- have been designated as either rare, threatened, or endangered by CDFW, CNPS, or the USFWS, and/or are protected under either the federal or California ESAs;
- are candidate species being considered or proposed for listing under these same acts;
- are fully protected by the California Fish and Game Code, §§ 3511, 4700, 5050, or 5515; and/or
- are of expressed concern to resource and regulatory agencies or local jurisdictions.

Special-status species reported for the region in the literature review or for which suitable habitat occurs on the site were assessed for their potential to occur within the Project site based on the following guidelines:

Present: The species was observed on site during a site visit or focused survey.

High: Habitat (including soils and elevation factors) for the species occurs on site and a known occurrence has been recorded within five miles of the site.

Moderate: Either habitat (including soils and elevation factors) for the species occurs on site and a known occurrence has been reported in the database, but not within five miles of the site, or a known occurrence occurs within five miles of the site and marginal or limited amounts of habitat occurs on site.

Low: Limited habitat for the species occurs on site and a known occurrence has been reported in the database, but not within five miles of the site, or suitable habitat strongly associated with the species occurs on site, but no records were found in the database search.

Presumed Absent: Focused surveys were conducted, and the species was not found, or species was found in the database search but habitat (including soils and elevation factors) is not present on site, or the known geographic range of the species does not include the survey area.

Note that location information on some special-status species may be of questionable accuracy or unavailable. Therefore, the environmental factors associated with a species' occurrence requirements may be considered sufficient reason to give a species a positive potential for occurrence. In addition, just because a record of a species does not exist in the databases does not mean it does not occur. In many cases, records may not be present in the databases because an area has not been surveyed for that species.

A desktop review of the Natural Resources Conservation Service's Web Soil Survey (NRCS 2018) and the corresponding USGS topographic maps was also conducted to determine if there were any blue line streams or drainages that might potentially fall under the jurisdiction of either federal or state agencies were present on the Project site.

2.2 Field Survey

2.2.1 Biological Reconnaissance Survey

The biological reconnaissance survey was conducted by walking the entire Project site to determine the vegetation communities and wildlife habitats on the Project site. The biologist documented the plant and animal species present on the Project site, and the location and condition of the Project site were assessed for the potential to provide habitat for special-status plant and wildlife species. Data were recorded on a Global Positioning System (GPS) unit, field notebooks, and/or maps. Photographs were also taken during the survey to provide a visual representation of the various vegetation communities on the Project site. The Project site was also examined to assess its potential to facilitate wildlife movement or function as a movement corridor for wildlife moving through the region.

Plant and wildlife species, including any special-status species, that were observed during the survey were recorded. Plant nomenclature follows that of *The Jepson Manual: Vascular Plants of California* (Baldwin et

al. 2012). Wildlife nomenclature follows the Society for the Study of Amphibians and Reptiles (SSAR; SSAR 2018), *Check-list of North American Birds* (American Ornithologist's Union [AOU] 2016), and the *Revised Checklist of North American Mammals North of Mexico* (Bradley et al. 2014).

In instances where a special-status species was observed, the date, species, location and habitat, and GPS coordinates were recorded. The locations of special-status species observations were recorded using a handheld GPS in NAD 83, Universal Transverse Mercator coordinates, Zone 11S.

2.2.2 Preliminary Jurisdictional Delineation

A desktop review was conducted to identify potential streams and hydric soils on the property. This entailed examination of the NRCS Soil Mapper, National Wetland Inventory (NWI) mapping, and the USGS topographic mapping of the Project site to aid in identifying potential biological constraints to the Project due to jurisdictional streams. A preliminary jurisdictional delineation of the site was conducted in the field. The property was walked to look for signs of Ordinary High-Water Mark (OHWM) as defined by the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (Arid West Region Supplement) (USACE 2008). The boundaries of potential Waters of the U.S. and Waters of the State were identified through aerial photograph interpretation and standard field methods including identification of water sources and examination of topography. Boundaries of potential jurisdictional areas were not formally delineated.

3.0 RESULTS

Summarized below are the results of the literature review and field surveys, including site characteristics, vegetation communities, plants, wildlife, special-status species, and special-status habitats (including any potential wildlife corridors).

3.1 Literature Review

3.1.1 Special-Status Plants and Wildlife

The CNDDB and CNPSEI searches were conducted on October 9, 2018. The database searches identified 55 special-status plant species and 40 special-status wildlife species that could occur on and/or near the Project site. A list was generated from the results of the literature review and the Project site was evaluated for suitable habitat that could support any of the special-status plant or wildlife species on the list.

3.1.2 U.S. Fish and Wildlife Service Designated Critical Habitat

The Project site is not located within any USFWS-designated critical habitat. The closest designated critical habitat is for San Bernardino kangaroo rat (*Dipodomys merriami parvus*) and is located approximately 1.5 miles east of the Project site.

3.1.3 Jurisdictional Drainages

The desktop review of the NRCS, NWI, and the USGS topographic map did not identify any potentially jurisdictional features, hydric soils, or wetlands present on the Project site.

3.2 Biological Reconnaissance Survey

The biological reconnaissance survey was conducted on October 10, 2018, by ECORP senior wildlife biologist, Phillip Wasz. Mr. Wasz has more than eight years of experience conducting surveys and habitat assessments for the special-status plant and wildlife species of San Bernardino County, including burrowing owl (*Athene cunicularia*) and San Bernardino kangaroo rat. Summarized below are the results of the biological reconnaissance survey, including site characteristics, vegetation communities, plants, wildlife, special-status species, and special-status habitats (including any potential wildlife corridors). Weather conditions during the survey are summarized in Table 1.

Table 1. Weather Conditions During the Survey

Date	Time		Temperature (˚F)		Cloud Cover (%)		Wind Speed (mph)	
	Start	end	Min	Max	min	max	min	max
10/10/18	1030	1230	65	7	50	35	2	5

3.2.1 Property Characteristics

The Project site consists of approximately 4.0 acres of mostly undeveloped former agriculture land immediately southwest of the intersection of Hermosa Avenue and Vista Grove Street. One structure, a small house, was identified on the Project site. The Project site was bounded by residential properties to the east and west, an existing SBCFCD access road to the north, and an equestrian boarding and training facility to the south. The Project site was very disturbed, with most of the vegetation on the Project site consisting of non-native grasses and forbs known to persist in disturbed areas. The soil on the Project site consisted of Soboba Gravely Loamy Sand. Representative site photographs are presented in Appendix A.

On historic aerial photographs from 1938, the Project site is shown to be a citrus grove, and no structures are visible within the vicinity of the Project site. The 1959 photographs show a house, a shed, and three large rectangular agricultural buildings on the Project site. Rows of citrus trees are also visible surrounding the structures within the Project site. Aerial photographs from 1966 show that the citrus trees within the Project site have been removed but the three rectangular agricultural buildings are still present on the property. Project site conditions remain unchanged in 1980 aerial photographs, but the 1995 aerial photograph shows that the large agricultural buildings have been removed, and the only remaining structures are the house and shed. These conditions remain unchanged in aerial photographs from 2002, 2005, 2009, 2010, and 2012 (NETROnline 2018).

3.2.2 Vegetation Communities

No native vegetation communities were present on the Project site. The Project site was generally classified as disturbed and developed. No special-status habitats or vegetation communities were observed on or near the Project site.

Disturbed

Areas devoid or mostly devoid of native vegetation and containing no buildings or other development were classified as disturbed. Other than the area associated with the small house in the southeast corner of the Project site, most of the Project site was classified as disturbed. The disturbed designation indicates a location that may be actively maintained to be free of vegetation or that has been compacted or disked to such a degree that native vegetation is very sparse.

Developed

Developed areas within the Project site included the small house in the southeast corner and the associated dirt road/driveway leading to the building.

3.2.3 Plants

Plant species observed on the Project site were typical of the disturbed and developed land present on the Project site. Plant species identified within the disturbed habitat on the Project site included mustard (*Brassica nigra*), Russian thistle (*Salsola tragus*), cheatgrass (*Bromus tectorum*), and jimsonweed (*Datura wrightii*). A row of eucalyptus (*Eucalyptus Sp.*) is present along the northern border of the Project site. Tree of heaven (*Ailanthus altissima*) and oleander (*Nerium oleander*) are also present on the Project site. A full list of plant species observed on or immediately adjacent to the Project site is included in Appendix B.

3.2.4 Wildlife

Due to its disturbed/developed nature, the Project site did not provide much habitat for wildlife species. However, some common wildlife species were observed during the survey, including house finch (*Haemorhous mexicanus*), acorn woodpecker (*Melanerpes formicivorus*), pocket gopher (*Thomomys bottae*), and mourning dove (*Zenaida macroura*). A complete list of wildlife species observed on or immediately adjacent to the Project site is included in Appendix C.

3.2.5 Potential for Special-Status Plant and Wildlife Species to Occur on the Project Site

The literature review and database searches identified 55 special-status plant species and 40 special-status wildlife species that could occur on or near the Project site. However, due to the Project site's history of being heavily disturbed and developed and the current lack of suitable habitat for special-status plant and wildlife species, many of the species are presumed absent from the Project site. Additionally, with the San Gabriel Mountains approximately 1.5 miles north of the Project site, many of the species that appeared in the literature review were outside of the elevation range of the Project site and were thus presumed absent.

Special-Status Plants

Although 55 special-status plant species appeared in the literature search, due to the Project site's long history of being heavily disturbed and/or developed, and the current lack of suitable habitat for the special-status plant species identified in the literature review and database searches, all 55 species are presumed to be absent from the Project site. Plant species with a CNPS Rare Plant Rank 3 or 4 were eliminated from the analysis because these rankings are considered a review list and a watch list,

respectively. Descriptions of the CNPS designations are found in Table 2 and a list of the 55 special-status plant species identified in the literature review is presented below.

Table 2. CNPS Status Designations

List Designation	Meaning
1A	Plants Presumed Extirpated in California and Either Rare or Extinct Elsewhere
1B	Plants Rare, Threatened, or Endangered in California and Elsewhere
2A	Plants Presumed Extirpated in California, But Common Elsewhere
2B	Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
3	Plants about which we need more information; a review list
4	Plants of limited distribution; a watch list
List 1B, 2, and 4 extension meanings:	
.1	Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2	Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

Note: According to CNPS (Skinner and Pavlik 1994), plants on Lists 1B and 2 meet definitions for listing as threatened or endangered under Section 1901, Chapter 10 of the California FGC (CDFW 1984). This interpretation is inconsistent with other definitions.

Plant Species Presumed Absent

The following species are presumed absent from the Project site due to the lack of suitable habitat, soil type, and/or elevation range at the Project site:

- singlewhorl burrobrush (*Ambrosia monogyra*) CNPS 2B.2
- San Gabriel manzanita (*Arctostaphylos glandulosa* ssp. *gabrielensis*) CNPS 1B.2
- marsh sandwort (*Arenaria paludicola*) CNPS 1B.1, State Listed Endangered and Federally Listed Endangered
- Mojave milkweed (*Asclepias nyctaginifolia*) CNPS 2B.1
- San Antonio milk-vetch (*Astragalus lentiginosus* var. *antonius*) CNPS 1B.3
- Big Bear Valley woollypod (*Astragalus leucolobus*) CNPS 1B.2
- Nevin's barberry (*Berberis nevinii*) CNPS 1B.1, State Listed Endangered and Federally Listed Endangered
- scalloped moonwort (*Botrychium crenulatum*) CNPS 2B.2
- Mingan moonwort (*Botrychium minganense*) CNPS 2B.2
- slender mariposa lily (*Calochortus clavatus* var. *gracilis*) CNPS 1B.2
- Palmer's mariposa lily (*Calochortus palmeri* var. *palmeri*) CNPS 1B.2
- lucky morning-glory (*Calystegia felix*) CNPS 1B.1
- western sedge (*Carex occidentalis*) CNPS 2B.3
- smooth tarplant (*Centromadia pungens* ssp. *laevis*) CNPS 1B.1
- salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*) CNPS 1B.2, State Listed Endangered and Federally Listed Endangered

- Parry's spineflower (*Chorizanthe parryi* var. *parryi*) CNPS 1B.1
- white-bracted spineflower (*Chorizanthe xanti* var. *leucotheca*) CNPS 1B.2
- California sawgrass (*Cladium californicum*) CNPS 2B.2
- slender-horned spineflower (*Dodecahema leptoceras*) CNPS 1B.1, State Listed Endangered and Federally Listed Endangered
- many-stemmed dudleya (*Dudleya multicaulis*) CNPS 1B.2
- Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum)* CNPS 1B.1, State Listed Endangered and Federally Listed Endangered
- southern alpine buckwheat (*Eriogonum kennedyi* var. *alpigenum*) CNPS 1B.3
- Johnston's buckwheat (*Eriogonum microthecum* var. *johnstonii*) CNPS 1B.3
- Los Angeles sunflower (*Helianthus nuttallii* ssp. *parishii*) CNPS 1A
- Parish's alumroot (*Heuchera parishii*) CNPS 1B.3
- mesa horkelia (*Horkelia cuneata* var. *puberula*) CNPS 1B.1
- knotted rush (*Juncus nodosus*) CNPS 2B.3
- short-sepaled lewisia (*Lewisia brachycalyx*) CNPS 2B.2
- lemon lily (*Lilium parryi*) CNPS 1B.2
- San Gabriel linanthus (*Linanthus concinnus*) CNPS 1B.2
- Peirson's lupine (*Lupinus peirsonii*) CNPS 1B.3
- Parish's desert-thorn (*Lycium parishii*) CNPS 2B.3
- Parish's bush-mallow (*Malacothamnus parishii*) CNPS 1A
- Jokerst's monardella (*Monardella australis* ssp. *jokerstii*) CNPS 1B.1
- Hall's monardella (*Monardella macrantha* ssp. *hallii*) CNPS 1B.3
- Pringle's monardella (*Monardella pringlei*) CNPS 1A
- prostrate vernal pool navarretia (*Navarretia prostrata*) CNPS 1B.1
- Robbins' nemacladus (*Nemacladus secundiflorus* var. *robbinsii*)) CNPS 1B.2
- short-joint beavertail (*Opuntia basilaris* var. *brachyclada*) CNPS 1B.2
- woolly mountain-parsley (*Oreonana vestita*) CNPS 1B.3
- Rock Creek broomrape (*Orobanche valida* ssp. *valida*) CNPS 1B.2
- rock-loving oxytrope (*Oxytropis oreophila* var. *oreophila)* CNPS 2B.3
- San Bernardino grass-of-Parnassus (*Parnassia cirrata* var. *cirrata*) CNPS 1B.3
- Brand's star phacelia (*Phacelia stellaris*) CNPS 1B.1
- white rabbit-tobacco (*Pseudognaphalium leucocephalum*) CNPS 2B.2
- Sanford's arrowhead (*Sagittaria sanfordii*) CNPS 1B.2
- black bog-rush (*Schoenus nigricans*) CNPS 2B.2
- chaparral ragwort (*Senecio aphanactis*) CNPS 2B.2
- salt spring checkerbloom (*Sidalcea neomexicana)* CNPS 2B.2
- prairie wedge grass (*Sphenopholis obtusata)* CNPS 2B.2
- San Bernardino aster (*Symphyotrichum defoliatum*) CNPS 1B.2
- Greata's aster (*Symphyotrichum greatae*) CNPS 1B.3
- rigid fringepod (*Thysanocarpus rigidus*) CNPS 1B.2
- grey-leaved violet (*Viola pinetorum* ssp. *grisea*) CNPS 1B.2
- golden violet (*Viola purpurea* ssp. *aurea*) CNPS 2B.2

Special-Status Wildlife

Although 40 special-status animal species appeared in the literature search, due to the Project site's long history of being heavily disturbed and/or developed, and the current lack of suitable habitat for the special-status wildlife species identified in the literature review and database searches, all 40 species are presumed to be absent from the Project site.

Wildlife Species Presumed Absent

The following species are presumed absent from the Project due to the lack of suitable habitat on the Project site:

- tricolored blackbird (*Agelaius tricolor*) CDFW SSC
- arroyo toad (*Anaxyrus californicus*) CDFW SSC, Federally Listed Endangered
- southern California legless lizard (*Anniella stebbinsi*) CDFW SSC
- pallid bat (*Antrozous pallidus*) CDFW SSC
- California glossy snake (*Arizona elegans occidentalis*) CDFW SSC
- long-eared owl (*Asio otus*) CDFW SSC
- coastal whiptail (*Aspidoscelis tigris stejnegeri*) CDFW SSC
- burrowing owl (*Athene cunicularia*) CDFW SSC
- Swainson's hawk (*Buteo swainsoni*) State Listed Threatened
- Santa Ana sucker (*Catostomus santaanae*) Federally Listed Threatened
- northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*) CDFW SSC
- pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*) CDFW SSC
- black swift (*Cypseloides niger*) CDFW SSC
- San Bernardino kangaroo rat (*Dipodomys merriami parvus*) Federally Listed Endangered, CDFW SSC
- Stephens' kangaroo rat (*Dipodomys stephensi*) Federally Listed Endangered, State Listed Threatened
- southwestern willow flycatcher (*Empidonax traillii extimus*) Federally Listed Endangered, State Listed Endangered
- western mastiff bat (*Eumops perotis californicus*) CDFW SSC
- arroyo chub (*Gila orcuttii*) CDFW SSC
- western yellow bat (*Lasiurus xanthinus*) CDFW SSC
- California black rail (*Laterallus jamaicensis coturniculus*) CDFW Fully Protected, State Listed Threatened
- San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) CDFW SSC
- south coast marsh vole (*Microtus californicus stephensi*) CDFW SSC
- San Diego desert woodrat (*Neotoma lepida intermedia*) CDFW SSC
- pocketed free-tailed bat (*Nyctinomops femorosaccus*) CDFW SSC
- big free-tailed bat (*Nyctinomops macrotis*) CDFW SSC
- steelhead - southern California Distinct Population Segment (*Oncorhynchus mykiss irideus* pop. 10) Federally Listed Endangered
- desert bighorn sheep (*Ovis canadensis nelsoni*) CDFW Fully Protected
- Los Angeles pocket mouse (*Perognathus longimembris brevinasus*) CDFW SSC

- coast horned lizard (*Phrynosoma blainvillii*) CDFW SSC
- coastal California gnatcatcher (*Polioptila californica californica*) Federally Listed Threatened, CDFW SSC
- foothill yellow-legged frog (*Rana boylii*) CDFW SSC
- southern mountain yellow-legged frog (*Rana muscosa*) Federally Listed Endangered, State Listed Endangered
- Delhi Sands flower-loving fly (*Rhinichthys osculus* ssp. 3)
- yellow warbler (*Setophaga petechia*) CDFW SSC
- Santa Ana speckled dace (*Rhinichthys osculus* ssp. 3) CDFW SSC
- Mohave tui chub (*Siphateles bicolor mohavensis*) CDFW Fully Protected, Federally Listed Endangered, State Listed Endangered
- Coast Range newt (*Taricha torosa*) CDFW SSC
- American badger (*Taxidea taxus*) CDFW SSC
- two-striped gartersnake (*Thamnophis hammondii*) CDFW SSC
- least Bell's vireo (*Vireo bellii pusillus*) Federally Listed Endangered, State Listed Endangered

3.2.6 Potentially Jurisdictional Drainages

Although a formal jurisdictional delineation was not conducted, no jurisdictional drainages, stream courses, and/or other water features were identified on the Project site. No hydric soils or riparian vegetation were observed within the Project site boundaries. A SBCFCD channel was identified along the west border of the Project site and is likely jurisdictional to the USACE, CDFW, and State Water Resources Control Board (SWRCB). However, no impacts to the channel are anticipated at this time. If impacts to the channel are necessary, consultation with the USACE, CDFW, and SWRCB will be required to determine if additional permits are required.

3.2.7 Raptors and Migratory Birds

Potential nesting habitat for migratory birds and raptors protected by the MBTA and CDFG Code was present on the Project site within the large trees on and adjacent to the Project site. Although the trees were generally identified as being in poor condition (TLC 2018), the trees are still considered suitable for nesting. Raptors typically breed between February and August, and songbirds and other passerines generally nest between March and August.

3.2.8 Wildlife Movement Corridors, Linkages, and Significant Ecological Areas

The concept of habitat corridors addresses the linkage between large blocks of habitat that allow the safe movement of mammals and other wildlife species from one habitat area to another. The definition of a corridor varies, but corridors may include such areas as greenbelts, refuge systems, underpasses, and biogeographic land bridges. In general, a corridor is described as a linear habitat, embedded in a dissimilar matrix, which connects two or more large blocks of habitat. Wildlife movement corridors are critical for the survivorship of ecological systems for several reasons. Corridors can connect water, food, and cover sources, spatially linking these three resources with wildlife in different areas. In addition, wildlife movement between habitat areas provides for the potential of genetic exchange between wildlife species populations, thereby maintaining genetic variability and adaptability to maximize the success of wildlife responses to changing environmental conditions. This is especially critical for small populations

subject to loss of variability from genetic drift and effects of inbreeding. The nature of corridor usage and wildlife movement patterns vary greatly among species.

The Project site was assessed for its ability to function as a wildlife corridor. The Project site was very disturbed and located in an urban setting surrounded by busy streets and residential developments. Additionally, the Project site, lacking substantial shrub or tree cover, was very exposed and did not contain any features that typically are associated with facilitating wildlife movement, including drainages, riverbeds, or other features which could provide cover. Therefore, the Project site would not be considered a linkage or corridor between conserved natural habitat areas that would need to be preserved to facilitate wildlife movement.

4.0 IMPACT ANALYSIS

4.1 Special-Status Species

The Project site, consisting mainly of disturbed or developed land, was devoid of native vegetation communities. Minor amounts of trash, including drink containers, pieces of concrete, and scrap wood were found scattered throughout the site and adjacent to the Project site.

The literature review and database searches identified 55 special-status plant species that occur near the Project site but, due to elevational factors, the Project site's history of being heavily disturbed, developed, disked, and the current lack of suitable habitat for special-status plant species on Project site, all of the special-status plant species identified in the literature review were presumed absent from the Project site. Therefore, the removal of approximately 4.0 acres of disturbed and developed land on the Project site will not contribute to the overall decline of any of the plant species identified in the literature review and database searches. No impacts to special-status plant species are anticipated to result from the development of this Project.

The literature review and database searches identified 40 special-status wildlife species that occur near the Project site, but based on the condition of the Project site, the Project site's history of being heavily disturbed, developed, disked, and the current lack of suitable habitat for special-status wildlife species on the Project site, all of the special-status wildlife species identified in the literature review were presumed absent from the Project site. Therefore, the removal of approximately 4.0 acres of disturbed and developed land on the Project site will not contribute to the overall decline of any of the wildlife species identified in the literature review and database searches. No impacts to special-status wildlife species are anticipated to result from the development of this Project.

The trees on and immediately adjacent to the Project site could provide nesting habitat for nesting birds and raptors protected by the MBTA and California Fish and Game Code. If construction of the proposed Project occurs during the bird breeding season (typically February 1 through August 31), ground-disturbing construction activities could directly affect birds protected by the MBTA and their nests through the removal of habitat on the Project site and indirectly through increased noise, vibrations, and increased human activity. Impacts to nesting birds would be less than significant with the implementation of Mitigation Measure BIO-1.

No federally or state-listed species are expected to occur on the Project site. Therefore, it is not likely that the Project will need to acquire a mechanism for "take" of federally or state-listed plant or wildlife species.

4.2 Sensitive Natural Communities

In general, the Project site consisted of disturbed/developed land that supported mostly non-native grass and forb species. The Project site did not contain any riparian habitat or other sensitive natural communities that would need to be preserved. No impacts to sensitive natural communities are anticipated to result from the development of this Project.

4.3 Federally Protected Wetlands and Waters of the United States

The Project site did not contain any federally protected wetlands or Waters of the United States. The development of the Project site will not result in impacts to federally protected wetlands or Waters of the United States.

4.4 Wildlife Corridors and Nursery Sites

The Project site is located within and adjacent to areas containing existing disturbances (e.g., paved roads and residential, commercial, and industrial developments). The Project site is heavily disturbed and/or developed and contained very little vegetative cover that would facilitate wildlife movement. No migratory wildlife corridors or native wildlife nursery sites were identified within the Project site. No impacts to wildlife corridors or nursery sites are expected to occur during the development of the Project site.

4.5 Habitat Conservation Plans and Natural Community Conservation Plans

The Project site is not located within an HCP or NCCP. Development of the Project site will not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional or state HCP.

5.0 RECOMMENDATIONS

The following mitigation measures are recommended prior to Project implementation:

BIO-1 – Pre-construction Nesting Bird Survey: If construction or other Project activities are scheduled to occur during the bird breeding season (February through August for raptors and March through August for most migratory bird species), a pre-construction nesting bird survey shall be conducted by a qualified biologist to ensure that active bird nests will not be disturbed or destroyed. The survey shall be completed no more than three days prior to initial ground disturbance. The nesting bird survey shall include the Project site and adjacent areas where Project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. If an active nest is identified, a qualified biologist shall establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities shall not occur within any disturbance limit buffer zones until the nest has fledged or has been deemed inactive by the qualified biologist.

The following best management practices are not mitigation measures pursuant to CEQA but are recommended to further reduce impacts to special-status species that have potential to occur on the property:

- Confine all work activities to a pre-determined work area;

- To prevent inadvertent entrapment of wildlife during the construction phase of a Project, all excavated, steep-walled holes or trenches more than two feet deep should be covered at the close of each working day by plywood or similar materials. If the trenches cannot be closed, one or more escape ramps constructed of earthen fill or wooden planks shall be installed. Before such holes or trenches are filled, they should be thoroughly inspected for trapped animals;
- Wildlife are often attracted to burrow- or den-like structures, such as pipes and may enter stored pipes and become trapped or injured. To prevent wildlife use of these structures, all construction pipes, culverts, or similar structures with a diameter of four inches or greater should be capped while stored onsite;
- All food-related trash items such as wrappers, cans, bottles, and food scraps should be disposed of in securely closed containers and removed at least once a week from a construction or Project site; and

6.0 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. Field work conducted for this assessment was performed by me or under my direct supervision. I certify that I have not signed a non-disclosure or consultant confidentiality agreement with the Project applicant or the applicant's representative and that I have no financial interest in the Project.

SIGNED: _____ DATE: November 1, 2018

Phillip Wasz
Senior Wildlife Biologist
ECORP Consulting, Inc.

7.0 LITERATURE CITED

[AOU] American Ornithologists' Union. 2016. Checklist of North American Birds, 7th edition with 57th Supplement.

Baldwin, B.G., G.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken, Eds. 2012. The Jepson Manual; Vascular Plants of California, Second Edition. Berkeley, CA, University of California Press.

Bradley, R.D., L.K. Ammerman, R.J. Baker, L.C. Bradley, J.A Cook, R.C. Dowler, C. Jones, D.J Schmidly, F.B. Stangl, Jr., R.A. Van Den Bussche, B. Wursig. 2014. Revised Checklist of North American Mammals North of Mexico. Museum of Texas Tech University.

Calflora. 2018. Information on California plants for education, research and conservation. [Web application]. Berkeley, California: The Calflora Database [a non-profit organization]. Available: http://www.calflora.org/. Accessed: February 2018.

[CDFG] California Department of Fish and Game. 1984. California Endangered Species Act. Fish and Game Code Section 2050-2085.

[CDFW] California Department of Fish and Wildlife. 2018a. RareFind California Department of Fish and Game Natural Diversity Database (CNDDB). California. Sacramento, CA, California Department of Fish and Wildlife, Biogeographic Data Branch.

[CDFW] California Department of Fish and Wildlife. 2018b. State and Federally Listed Endangered and Threatened Animals of California. Sacramento (CA): State of California, the Resources Agency, Department of Fish and Wildlife.

[CDFW] California Department of Fish and Wildlife. 2018c. Special Animals List. Sacramento (CA): State of California, the Resources Agency, Department of Fish and Game. Available: www.dfg.ca.gov/bdb/pdfs/SPAnimals.pdf. Accessed: February 2018

[CNPS] California Native Plant Society, Rare Plant Program. 2018. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society, Sacramento, CA. Website http://www.rareplants.cnps.org. Accessed: February 2018.

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1. U. S. Army Engineer Waterways Experiment Station. Vicksburg, Mississippi.

Hickman, J.C., editor. 1993. The Jepson Manual. Berkeley: University of California Press. 1,400 pp.

[NRCS] Natural Resources Conservation Service. 2018. "Web Soil Survey" from http://websoilsurvey.nrcs.usda.gov. Accessed: February 201

NETROnline. Historic Aerials. 2018. [accessed October 24, 2018]. https://www.historicaerials.com/viewer.

Sawyer, J.O., T. Keeler-Wolf, and J.M. Evens. 2009. A Manual of California Vegetation, 2nd ed. California Native Plant Society, Sacramento, CA. Sibley, D. A. (2003). The Sibley Field Guide to Birds of North America New York.

Skinner, M.W., and B.M. Pavlik, eds. 1994. California Native Plant Society's inventory of rare and endangered vascular plants of California. Fifth edition. Spec. Publ. No. 1, California Native Plant Society, Sacramento, CA, 338 pp.

[SSAR] Society for the Study of Amphibians and Reptiles. 2018. Scientific and Standard English Names of Amphibians and Reptiles of North American North of Mexico, With Comments Regarding Confidence in our Understanding. Eighth Edition. Committee on Standard English and Scientific Names.

[TLC] Tree of Life Consulting. 2018. Everett, L. Arborist Report ECORP Consulting, Inc. Tract # 18305 City of Rancho Cucamonga. Prepared for ECORP Consulting, INC.

[USACE] U.S. Army Corps of Engineers. 2008. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region*. ed. J.S. Wakeley, R.W. Lichvar, and C.V. Noble. ERDC/EL TR-06-16. Vicksburg, MS: U.S. Army Engineer Research and Development Center.

[USFWS] United States Fish and Wildlife Service 1918. Migratory Bird Treaty Act. Section 16 of the U.S. Code (703-712), as amended 1989.

LIST OF APPENDICES

APPENDIX A

Representative Site Photographs

Photograph 1. Access road coming from Hermosa Avenue looking east

Photograph 2. Eastern border of the Project area facing south

Photograph 3. Compacted soil in northeast portion of Project site facing southwest

Photograph 4. Representative site vegetation from southwest corner looking northeast

Photograph 5. Eucalyptus trees along northern boundary facing north

Photograph 6. Old dirt road along northern border of the Project site facing west

APPENDIX B

Plant Species Compendium

SCIENTIFIC NAME	COMMON NAME
ADOXACEAE	**MUSKROOT FAMILY**
Sambucus nigra subsp. Caerulea	Blue elderberry
ANACARDIACEAE	**SUMAC FAMILY**
Malosma laurina	Laurel sumac
APOCYNACEAE	**DOGBANE FAMILY**
Nerium oleander	Oleander
ASTERACEAE	**SUNFLOWER FAMILY**
Centaurea melitensis	Tocalote
Helianthus californicus	California sunflower
Heterotheca grandiflora	Telegraph weed
BRASSICACEAE	**MUSTARD FAMILY**
Brassica nigra	Black mustard
CHENOPODIACEAE	**GOOSEFOOT FAMILY**
Salsola tragus	Russian thistle
GERANIACEAE	**GERANIUM FAMILY**
Erodium cicutarium	Red stemmed filaree
MYRTACEAE	**MYRTLE FAMILY**
Eucalyptu ssp.	Gum tree
POACEAE	**GRASS FAMILY**
Bromus diandrus	Ripgut grass
Bromus madritensis	Foxtail brome
Bromus tectorum	Cheatgrass
POLYGONACEAE	**BUCKWHEAT FAMILY**
Eriogonum fasciculatum	California buckwheat
SIMAROUBACEAE	**SIMAROUBA FAMILY**
Ailanthus altissima	Tree of heaven
SOLANACEAE	**NIGHTSHADE FAMILY**
Datura wrightii	Jimsonweed

Wildlife Species Compendium

SCIENTIFIC NAME	COMMON NAME
REPTILIA	**REPTILES**
Iguanidae	**Iguanids**
Uta stansburiana	Side-blotched lizard
AVES	**BIRDS**
Columbidae	**Pigeons and Doves**
Zenaida macroura	Mourning dove
Trochilidae	**Hummingbirds**
Calypte anna	Anna's hummingbird
Picidae	**Woodpeckers & Allies**
Melanerpes formicivorus	Acorn woodpecker
Corvidae	**Jays and Crows**
Aphelocoma californica	California scrub-jay
Mimidae	**Mockingbirds and Thrashers**
Mimus polyglottos	Northern mockingbird
Parulidae	**Wood warblers**
Setophaga coronata (Previously Dendroica coronata)	Yellow-rumped warbler
Fringillidae	**Finches**
Haemorhous mexicanus (Previously Carpodacus mexicanus)	House finch
MAMMALIA	**MAMMALS**
Geomyidae	**Pocket gophers**
Thomomys bottae	Botta's pocket gopher

ATTACHMENT B

Representative Site Photos

Photo 1. Horse stables along northern Project boundary, facing southwest

Photo 2. Fallen tree and disturbed vegetation along northern Project boundary, facing west

Photo 3. Fencing and abandoned boat among dry vegetation outside northern fence line, facing south

Photo 4. Fencing for horse stables along northern boundary, facing southwest

Photo 5. Western project boundary along horse trail, facing east

Photo 6. Vista Grove Street, along northern boundary of Project site, facing west