BIOLOGICAL TECHNICAL REPORT ADDENDUM

FOR

KELLER CROSSING RESIDENTIAL DEVELOPMENT PROJECT AND OFFSITE IMPROVEMENTS

LOCATED IN THE COMMUNITY OF FRENCH VALLEY, RIVERSIDE COUNTY, CALIFORNIA

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EXECUTIVE SUMMARY

This Biological Technical Report Addendum for the Keller Crossing Residential Development Project has been prepared to analyze potential impacts to special-status biological resources resulting from the addition of a 0.13-acre offsite improvement area to the Keller Crossing Residential Development Project ("the Project"). The addition of the 0.13-acre offsite impact area to the Project would not result in any additional significant impacts to biological resources that were not previously analyzed by the September 2025 Biological Technical Report. No new mitigation is proposed or required, and the Project remains consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

1.0 INTRODUCTION

1.1 Addendum Background and Scope of Work

This document is an addendum to the Biological Technical Report for the Keller Crossing Residential Development Project and Offsite Improvements, dated September 3, 2025 ("2025 BTR"), for a residential development located in the Community of French Valley, Riverside County, California. This addendum provides the results of biological surveys for an approximately 0.13-acre area of additional offsite improvements that was identified after preparation of the 2025 BTR. The 0.13-acre area ("Addendum Offsite Project") evaluated herein consists of grading an earthen channel to convey flows southwesterly from a previously analyzed storm drain outfall. The development footprint associated with grading the proposed earthen channel would avoid a natural drainage course that is located outside of the Addendum Offsite Project area. Flows from the earthen channel would sheet flow into the natural drainage course outside of the Addendum area, and constructing the channel would not impact the existing drainage course outside of the Addendum area.

The 2025 BTR analyzed a total Project area of 227.89 acres, of which approximately 195.93 acres is considered as "the onsite Project" and 31.96 acres consist of offsite infrastructural improvements referenced as "the offsite Project." With the addition of the 0.13-acre area analyzed herein, the Project area totals 228.02 acres, of which the onsite portion remains at 195.93 acres and the offsite portion increases to 32.09 acres.

This addendum identifies and evaluates impacts to biological resources associated with the 0.13-acre Addendum Offsite Project in the context of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), the California Environmental Quality Act (CEQA), and state and federal regulations such as the Endangered Species Act (ESA), Clean Water Act (CWA), Clean Water Code (CWC), and the California Fish and Game Code.

1.2 Project Location

The Addendum Offsite Project comprises approximately 0.13 acre in the Community of French Valley, Riverside County, California [Exhibit 1 – Regional Map] and is located within Section 28 of Township 6 South, Range 2 West, of the Winchester, California United States Geological

Survey (USGS) 7.5′ topographic quadrangle map [Exhibit 2 – Vicinity Map]. The Addendum Offsite Project infrastructural improvement is located south of Keller Road easterly of Keller Flat Court [Exhibit 3, Aerial Map], and is fully located in APN 476-010-009.

1.3 Relationship of the Project to the MSHCP

The 227.89-acre onsite and offsite Project was determined to be consistent with the MSHCP as part of JPR 09-12-14-01, dated February 25, 2010, and amended July 12, 2024. The 0.13-acre Addendum Offsite Project is located entirely in independent Criteria Cell 5275 of the MSHCP Criteria Area Southwest Area Plan Subunit 5 – French Valley/Lower Sedco Hills [Exhibit 4A – MSHCP Overlay Map]. A portion of Addendum Offsite Project is in the Burrowing Owl (*Athene cunicularia*) Survey Area but is not in the MSHCP Criteria Area Plant Species Survey Area (CAPSSA), Narrow Endemic Plant Species Survey Area (NEPSSA), or any other MSHCP survey areas [Exhibit 4B – MSHCP Survey Areas Map]. The 2025 BTR reported that 6.63 acres of the Project area (6.03 onsite and 0.60 offsite) is in Criteria Cell 5275; with the addition of Addendum Offsite Project, the offsite Project area in Cell 5275 increases to 0.73 acre and the Project total increases to 6.75 acres.

2.0 METHODOLOGY

In order to adequately identify biological resources in accordance with the requirements of CEQA, GLA assembled biological data consisting of the following main components:

- Evaluation of aquatic resources (including wetlands and riparian habitat) subject to the jurisdiction of the Corps, Regional Board, and/or CDFW
- Evaluation of MSHCP Riparian/Riverine Areas
- Performance of vegetation mapping
- Performance of habitat assessments to evaluate the presence/absence of special-status species in accordance with the requirements of CEQA and the MSHCP

The focus of the biological surveys was determined through initial site reconnaissance, a review of the California Natural Diversity Database (CNDDB, CDFW 2026), CNPS 9th edition online inventory (CNPS 2026), Natural Resource Conservation Service soil data (NRCS 2021), Information for Planning and Consultation (IPAC) database (USFWS 2026), the RCA MSHCP Information Map (RCA 2026), other pertinent literature, and knowledge of the region. Site-specific general surveys within the Project were conducted on foot in the Addendum Offsite Project.

GLA biologists Zack West and Ann Marsolais conducted a site visit of the 0.13-acre Addendum Offsite Project on February 20, 2026, to identify and analyze actual or potential impacts to sensitive biological resources associated with the Addendum Offsite Project.

For this report, plants were considered special status based on one or more of the following criteria:

- Listing through the federal and/or State ESA; and/or

- CNPS Rare Plant Inventory Rank 1A, 1B, 2A, 2B, 3, or 4.

Wildlife species were considered special status based on one or more of the following criteria:

- Listing through the federal and/or State ESA; and/or
- Designation by the State as a Species of Special Concern (SSC) or Fully Protected (FP) species.

Vegetation communities and habitats were considered special status based on one or more of the following criteria:

- Riparian/riverine habitat; and/or
- Wetland/vernal pool habitat.

2.1 Botanical Resources

A site-specific survey program was designed to accurately document the botanical resources within the onsite and offsite Project, and consisted of five components: (1) a literature search; (2) preparation of a list of target special-status plant species and sensitive vegetation communities that could occur within the Project; (3) a general field reconnaissance survey; (4) vegetation mapping according to Holland (1986); and (5) habitat assessments for special-status plants (including those with MSHCP requirements).

2.1.1 Literature Search

Prior to conducting fieldwork, pertinent literature on the flora of the region was examined. A thorough archival review was conducted using available literature and other historical records. These resources included the following:

- CNPS, Rare Plant Program. Inventory of Rare and Endangered Plants of California (online edition, v-9.5, CNPS 2026);
- CNDDB for the USGS 7.5′ Winchester quadrangle and surrounding quadrangles (CDFW 2026).
- USFWS IPaC database (USFWS 2026).

2.1.2 Vegetation Mapping

The MSHCP utilizes vegetation mapping for the overall Plan area derived from baseline mapping conducted in 1995, with updates provided in 2005 and 2012. The 1995 baseline mapping classified vegetation types according to Holland (1986), the 2005 baseline mapping was conducted by CNPS according to the CNPS Vegetation Alliances of Western Riverside County (2005) in accordance with the National Vegetation Classification System (NVCS), and the 2012 baseline mapping adhered to A Manual of California Vegetation, Second Edition or MCVII (2008), which also aligns with the NVCS. The MSHCP states that the baseline vegetation map is limited by the timeframe within which the data were assembled as well as the precision of those

data, and that the current extent and character of vegetation communities may differ from that depicted on the MSHCP vegetation map.

As presented in the 2025 BTR, vegetation communities for the 227.89-acre Project were mapped according to Holland (1986) in 2021 and 2025 and crosswalked to the MCV in 2025. In 2026, GLA biologists Zack West and Ann Marsolais conducted vegetation mapping of the Addendum Offsite Project characterizing the vegetation as both Holland and MCV community types. Mapping was performed utilizing current aerial photography in the ArcGIS Field Maps mobile app.

2.1.3 Special-Status Plant Species and Habitats Evaluated for the Project

A literature search including the CNPS online inventory (2026) and CNDDB (2026) was conducted to obtain a list of special-status plants with the potential to occur within the Addendum Offsite Project. The Addendum Offsite Project is not in the NEPSSA or CAPSSA survey areas, and thus no evaluation for NEPSSA and CAPSSA plants species was required.

Based on this information and knowledge of results of botanical surveys for the overall Project area conducted in 2021 and 2025, GLA biologists Zack West and Ann Marsolais conducted a habitat assessment of the Addendum Offsite Project on February 20, 2026, during which it was determined that focused surveys were not warranted.

2.2 Wildlife Resources

Wildlife species were evaluated and detected during the field survey by sight, call, tracks, and scat. Site reconnaissance and habitat assessments were conducted on February 20, 2026, by biologists Zack West and Ann Marsolais in such a manner as to allow inspection of the Addendum Offsite Project by direct observation, including the use of binoculars. Observations of physical evidence and direct sightings of wildlife were recorded in field notes during the visit. Scientific nomenclature and common names for vertebrate species referred to in this report follow the Complete List of Amphibian, Reptile, Bird, and Mammal Species in California (CDFW 2016), Standard Common and Scientific Names for North American Amphibians, Turtles, Reptiles, and Crocodilians 8th Edition, and the American Ornithological Society's Online Check-list of North American Birds (Chesser 2024) for birds.

2.2.2 Special-Status Animal Species Evaluated for the Project

A literature search was conducted to obtain a list of special-status wildlife species with the potential to occur within the Addendum Offsite Project. Species were evaluated based on three factors, including: 1) species identified by the CNDDB, and/or USFWS IPaC as occurring (either currently or historically) on or in the vicinity of the onsite and offsite Project site, 2) species survey areas as identified by the MSHCP; and 3) any other special-status animals that are known to occur within the vicinity of the Addendum Offsite Project, or for which potentially suitable habitat occurs on Addendum Offsite Project.

2.2.4 Habitat Assessments and Focused Surveys for Special-Status Animals Species

Burrowing Owl

A portion of the 0.13-acre Addendum Offsite Project is located in the MSHCP Burrowing Owl Survey Area. As described in the 2025 BTR, focused surveys for the overall 227.89-acre Project were conducted in 2021 and 2025 by GLA biologists in accordance with survey guidelines described in the 2006 MSHCP Burrowing Owl Survey Instructions. The Addendum Offsite Project is adjacent to the area surveyed on foot in 2021 and 2025. Although not directly surveyed in 2021/2025, the Addendum Offsite Project area is in the 500-foot visual survey area relative to the overall Project and was surveyed with binoculars in 2021 and 2025 as required by Step II-B of the Survey Instructions.

Crotch's Bumble Bee

As discussed in the 2025 BTR, focused foraging surveys for the Crotch's bumble bee (*Bombus crotchii*; CBB) were conducted within suitable habitat areas of the 227.89-acre Project site during the 2025 survey period. No CBB were detected in 2025. GLA biologists Zack West and Ann Marsolais evaluated the Addendum Offsite Project on February 20, 2026, for suitable habitat, including floral resources.

2.3 Jurisdictional Waters and MSHCP Riparian/Riverine Areas and Vernal Pools

Prior to beginning the field surveys, a color aerial photograph and the previously cited USGS topographic map were examined to determine the locations of potential areas of Corps/CDFW jurisdiction. No potential jurisdictional areas were identified within the Addendum Offsite Project, which was confirmed in the field on February 20, 2026, by GLA biologists Zack West and Ann Marsolais. Thus, no jurisdictional delineation was performed.

GLA biologists Zack West and Ann Marsolais also evaluated the Addendum Offsite Project on February 20, 2026, for MSHCP riparian/riverine areas and vernal pool/seasonal pool habitat, including features with the potential to support fairy shrimp. To assess for vernal/seasonal pools (including fairy shrimp habitat), GLA biologists evaluated the topography of the site including whether the site contained depressional features/topography with the potential to become inundated; whether the site contained soils associated with vernal/seasonal pools; and whether the site supported plants that suggested areas of localized ponding.

3.0 REGULATORY SETTING

The proposed Project is subject to State and federal laws and regulations associated with a number of regulatory programs. These programs often overlap and were developed to protect natural resources, including State- and federally-listed plants and animals; aquatic resources including rivers and creeks, ephemeral streambeds, wetlands, and areas of riparian habitat; special-status species which are not listed as threatened or endangered by the State or federal governments; and special-status vegetation communities.

3.1 Endangered Species Acts

3.1.1 California Endangered Species Act

California's ESA (CESA) defines an endangered species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease." The State defines a threatened species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985, is a threatened species." Candidate species are defined as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list." Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the Federal ESA (FESA), the CESA does not list invertebrate species.

Article 3, Sections 2080 through 2085 of the CESA addresses the taking of threatened, endangered, or candidate species by stating, "No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided." Under the CESA, "take" is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Exceptions authorized by the state to allow "take" require permits or memoranda of understanding and can be authorized for endangered species, threatened species, or candidate species for scientific, educational, or management purposes, and for take incidental to otherwise lawful activities. Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

3.1.2 Federal Endangered Species Act

The FESA of 1973 defines an endangered species as "any species that is in danger of extinction throughout all or a significant portion of its range." A threatened species is defined as "any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to "take" any listed species. "Take" is defined in Section 3(18) of FESA as follows: "...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Further, the USFWS, through regulation, has interpreted the terms "harm" and "harass" to include certain types of habitat modification that result in injury to, or death of species as forms of "take." These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a federal agency for an action that could affect a federally listed plant and

animal species, the property owner and agency are required to consult with USFWS. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants.

3.1.3 State and Federal Take Authorizations

Federal or State authorizations of impacts to or incidental take of a listed species by a private individual or other private entity would be granted in one of the following ways:

- Section 7 of the FESA stipulates that any federal action that may affect a species listed as threatened or endangered requires a formal consultation with USFWS to ensure that the action is not likely to jeopardize the continued existence of the listed species or result in destruction or adverse modification of designated critical habitat. 16 U.S.C. 1536(a)(2).

- In 1982, the FESA was amended to give private landowners the ability to develop a Habitat Conservation Plan (HCP) pursuant to Section 10(a) of the FESA. Upon development of an HCP, the USFWS can issue incidental take permits for listed species where the HCP specifies at minimum, the following: (1) the level of impact that will result from the taking, (2) steps that will minimize and mitigate the impacts, (3) funding necessary to implement the plan, (4) alternative actions to the taking considered by the applicant and the reasons why such alternatives were not chosen, and (5) such other measures that the Secretary of the Interior may require as being necessary or appropriate for the plan.

- In certain circumstances, Section 2080.1 of the California Fish and Game Code allows CDFW to adopt the federal incidental take statement or the 10(a) permit as its own based on its findings that the federal permit adequately protects the species under State law.

3.1.4 Take Authorizations Pursuant to the MSHCP

The Western Riverside County MSHCP was adopted on June 17, 2003, and an Implementing Agreement was executed between the federal and State wildlife agencies and participating entities. The MSHCP is a comprehensive habitat conservation-planning program for western Riverside County. The intent of the MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. As such, the MSHCP is intended to streamline review of individual projects with respect to the species and habitats addressed in the MSHCP, and to provide for an overall Conservation Area that would be of greater benefit to biological resources than would result from a piecemeal regulatory approach. The MSHCP provides coverage (including take authorization for listed species) for special-status plant and animal species, as well as mitigation for impacts to sensitive species pursuant to Section 10(a) of the FESA.

Through agreements with USFWS and CDFW, the MSHCP designates 146 special-status animal and plant species that receive some level of coverage under the plan. Of the 146 "Covered Species" designated under the MSHCP, the majority of these species have no additional survey/conservation requirements. In addition, through project participation with the MSHCP, the MSHCP provides mitigation for project-specific impacts to Covered Species such that impacts are considered reduced

to below a level of significance pursuant to CEQA. As noted above, project-specific survey requirements exist for species designated as "Covered Species not yet adequately conserved". These include Narrow Endemic Plant Species, as identified by the NEPSSA; Criteria Area Plant Species identified by the CAPSSA; animal species as identified by survey area; and plant and animal species associated with riparian/riverine areas and vernal pool habitats (*Volume I, Section 6.1.2* of the MSHCP document).

For projects that have a federal nexus such as through federal CWA 404 permitting, take authorization for federally listed covered species would occur under Section 7 (not Section 10) of FESA; USFWS would provide an MSHCP consistency review of the proposed project, resulting in a Biological Opinion (BO). The BO would require no more compensation than what is required to be consistent with the MSHCP.

3.2 California Environmental Quality Act

3.2.1 CEQA Guidelines Section 15380

CEQA requires evaluation of a project's impacts on biological resources and provides guidelines and thresholds for use by lead agencies for evaluating the significance of proposed impacts. Sections 5.1.1 and 5.1.2 below set forth these thresholds and guidelines. Furthermore, pursuant to the CEQA Guidelines Section 15380, CEQA provides protection for non-listed species that could potentially meet the criteria for state listing. For plants, CDFW recognizes that plants with a California Rare Plant Rank (CRPR) of 1A, 1B, 2A, or 2B in the CNPS *Inventory of Rare and Endangered Plants in California* may meet the criteria for listing and should be considered under CEQA. CDFW also recommends protection of regionally important plants, such as locally rare species, disjunct populations of more common plants, or plants with a CRPR of 3 or 4.

3.2.2 Special-Status Plants, Wildlife and Vegetation Communities Evaluated Under CEQA

Federally Designated Special-Status Species

Within recent years, the USFWS instituted changes in the listing status of candidate species. Former C1 (candidate) species are now referred to simply as candidate species and represent the only candidates for listing. Former C2 species (for which the USFWS had insufficient evidence to warrant listing) and C3 species (either extinct, no longer a valid taxon, or more abundant than was formerly believed) are no longer considered as candidate species. Therefore, these species are no longer maintained in list form by the USFWS, nor are they formally protected. This term is employed in this document but carries no official protections. All references to federally protected species in this report (whether listed, proposed for listing, or candidate) include the most current published status or candidate category to which each species has been assigned by USFWS.

For this report the following acronyms are used for federal special-status species:

- FE Federally listed as Endangered
- FT Federally listed as Threatened
- FPE Federally proposed for listing as Endangered
- FPT Federally proposed for listing as Threatened
- FC Federal Candidate Species (former C1 species)

State-Designated Special-Status Species

Some mammals and birds are protected by the State as Fully Protected (FP) Mammals or Fully Protected Birds, as described in the California Fish and Game Code, Sections 4700 and 3511, respectively. California SSC are designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. This list is primarily a working document for the CDFW's CNDDB project. Informally listed taxa are not protected but warrant consideration in the preparation of biotic assessments. For some species, the CNDDB is only concerned with specific portions of the life history, such as roosts, rookeries, or nest sites.

For this report the following acronyms are used for State special-status species:

- SE State-listed as Endangered
- ST State-listed as Threatened
- SR State-listed as Rare
- SCE State Candidate for listing as Endangered
- SCT State Candidate for listing as Threatened
- FP State Fully Protected
- SP State Protected
- SSC State Species of Special Concern

California Rare Plant Ranks

The California Native Plant Society (CNPS) is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in California. In a collaborative effort with CDFW's CNDDB project, the CNPS Ninth Edition Inventory of Rare and Endangered Plants of California categorizes plants of interest into six California Rare Plant Ranks (CRPR) based on their geographic distribution and potential threats to existing populations. The CNPS Inventory is used by CDFW as the candidate species list for plants that may be listed as state threatened and endangered. The six categories of rarity are summarized in Table 3-1.

Table 3-1. CNPS Ranks 1, 2, 3, and 4, and Threat Code Extensions

CNPS Rank	Comments
Rank 1A – Plants Presumed Extirpated in California and Either Rare or Extinct Elsewhere	Thought to be extinct in California based on a lack of observation or detection for many years.

CNPS Rank	Comments
Rank 1B – Plants Rare, Threatened, or Endangered in California and Elsewhere	Species, which are generally rare throughout their range that are also judged to be vulnerable to other threats such as declining habitat.
Rank 2A – Plants presumed Extirpated in California, But Common Elsewhere	Species that are presumed extinct in California but more common outside of California
Rank 2B – Plants Rare, Threatened or Endangered in California, But More Common Elsewhere	Species that are rare in California but more common outside of California
Rank 3 – Plants About Which More Information Is Needed (A Review List)	Species that are thought to be rare or in decline but CNPS lacks the information needed to assign to the appropriate list. In most instances, the extent of surveys for these species is not sufficient to allow CNPS to accurately assess whether these species should be assigned to a specific rank. In addition, many of the Rank 3 species have associated taxonomic problems such that the validity of their current taxonomy is unclear.
Rank 4 – Plants of Limited Distribution (A Watch List)	Species that are currently thought to be limited in distribution or range whose vulnerability or susceptibility to threat is currently low. In some cases, as noted above for Rank 3 species, CNPS lacks survey data to accurately determine status in California. Many species have been placed on Rank 4 in previous editions of the "Inventory" and have been removed as survey data has indicated that the species are more common than previously thought. CNPS recommends that species currently included on this list should be monitored to ensure that future substantial declines are minimized.
Extension	**Comments**
.1 – Seriously endangered in California	Species with over 80% of occurrences threatened and/or have a high degree and immediacy of threat.
.2 – Fairly endangered in California	Species with 20-80% of occurrences threatened.
.3 – Not very endangered in California	Species with <20% of occurrences threatened or with no current threats known.

3.3 Jurisdictional Waters

3.3.1 Army Corps of Engineers

Pursuant to Section 404 of the Clean Water Act, the Corps regulates the discharge of dredged and/or fill material into waters of the United States. The term "waters of the United States" is defined in Corps regulations at 33 CFR Part 328.3(a) as:

(1) Waters which are:

(i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;

(ii) The territorial seas; or

(iii) Interstate waters;

(2) Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (a)(5) of this section;

(3) Tributaries of waters identified in paragraphs (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;

(4) Wetlands adjacent to the following waters:

(i) Waters identified in paragraph (a)(1) of this section; or

(ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;

(5) Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section.

Corps regulations at 33 CFR Part 328.3(b) exclude the following from being "waters of the United States" even where they otherwise meet the terms of paragraphs (a)(2) through (5) above:

(1) Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

(3) Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;

(4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;

(5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;

(6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;

(7) Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and

(8) Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.

In the absence of wetlands, the limits of Corps jurisdiction in non-tidal waters, such as intermittent streams, extend to the OHWM which is defined at 33 CFR 328.3(c)(4) as:

> ...that line on the shore established by the fluctuation of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

"Adjacent" wetlands are defined by 33 CFR 328.3(c)(2) as those wetlands "having a continuous surface connection" to other waters of the United States.

Wetland Definition Pursuant to Section 404 of the Clean Water Act

The term "wetlands" (a subset of "waters of the United States") is defined at 33 CFR 328.3(c)(1) as "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. Wetlands generally include swamps, marshes, bogs, and similar areas." In 1987 the Corps published the Wetland Manual to guide its field personnel in determining jurisdictional wetland boundaries. The methodology set forth in the Wetland Manual and the Arid West Supplement generally requires that, in order to be considered a wetland, the vegetation, soils, and hydrology of an area exhibit at least minimal hydric characteristics. While the Wetland Manual and Arid West Supplement provide great detail in methodology and allow for varying special conditions, a wetland should normally meet each of the following three criteria:

- More than 50 percent of the dominant plant species at the site must be hydrophytic in nature as published in the most current national wetland plant list;
- Soils must exhibit physical and/or chemical characteristics indicative of permanent or periodic saturation (e.g., a gleyed color, or mottles with a matrix of low chroma indicating a relatively consistent fluctuation between aerobic and anaerobic conditions); and
- Whereas the Wetland Manual requires that hydrologic characteristics indicate that the ground is saturated to within 12 inches of the surface for at least five percent of the growing season during a normal rainfall year, the Arid West Supplement does not include a quantitative criteria with the exception for areas with "problematic hydrophytic vegetation", which require a minimum of 14 days of ponding to be considered a wetland.

3.3.2 Regional Water Quality Control Board

Pursuant to CCR title 23, section 3831(w), the State Water Resources Control Board (State Water Board) has jurisdiction over waters of the United States and waters of the State:

> "Waters of the United States" means surface water and water bodies as defined by EPA regulations (e.g., 40 CFR Section 122.2). All waters of the United States in California are also "waters of the state" (defined by the Porter-Cologne Water Quality Control Act as "any surface water or ground water, including saline waters, within the boundaries of the state." Water Code Section 13050(e)]). Not all waters of the state (e.g., ground water) are waters of the United States.

In addition, State Water Board Resolution 2000-014 approved revised regulations for the 401 Water Quality Certification Program that defined waters of the State:

> …wetlands that meet the current definition, or any historic definition, of waters of the U.S. are waters of the state. Therefore, waters of the state includes features that have been determined by the U.S. Environmental Protection Agency (EPA) or the Corps to be "waters of the U.S." in an approved jurisdictional determination; "waters of the U.S." identified in an aquatic resource report verified by the Corps upon which a permitting decision was based; and features that are consistent with any current or historic final judicial interpretation of "waters of the U.S." or any current or historic federal regulation defining "waters of the U.S." under the federal Clean Water Act.

State Wetland Definition

The State Board Wetland Definition and Procedures define an area as wetland as follows:

> An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

The following wetlands are waters of the state:

1. Natural wetlands;
2. Wetlands created by modification of a surface water of the state;[1] and
3. Artificial wetlands[2] that meet any of the following criteria:

    a. Approved by an agency as compensatory mitigation for impacts to other waters of the state, except where the approving agency explicitly identifies the mitigation as being of limited duration;
    b. Specifically identified in a water quality control plan as a wetland or other water of the state;

[1] "Created by modification of a surface water of the state" means that the wetland that is being evaluated was created by modifying an area that was a surface water of the state at the time of such modification. It does not include a wetland that is created in a location where a water of the state had existed historically but had already been completely eliminated at some time prior to the creation of the wetland. The wetland being evaluated does not become a water of the state due solely to a diversion of water from a different water of the state.
[2] Artificial wetlands are wetlands that result from human activity.

c. Resulted from historic human activity, is not subject to ongoing operation and maintenance, and has become a relatively permanent part of the natural landscape; or
d. Greater than or equal to one acre in size, unless the artificial wetland was constructed, and is currently used and maintained, primarily for one or more of the following purposes (i.e., the following artificial wetlands are not waters of the state unless they also satisfy the criteria set forth in 2, 3a, or 3b):

i. Industrial or municipal wastewater treatment or disposal,
ii. Settling of sediment,
iii. Detention, retention, infiltration, or treatment of stormwater runoff and other pollutants or runoff subject to regulation under a municipal, construction, or industrial stormwater permitting program,
iv. Treatment of surface waters,
v. Agricultural crop irrigation or stock watering,
vi. Fire suppression,
vii. Industrial processing or cooling,
viii. Active surface mining – even if the site is managed for interim wetlands functions and values,
ix. Log storage,
x. Treatment, storage, or distribution of recycled water, or
xi. Maximizing groundwater recharge (this does not include wetlands that have incidental groundwater recharge benefits); or
xii. Fields flooded for rice growing.[3]

All artificial wetlands that are less than an acre in size and do not satisfy the criteria set forth in 2, 3.a, 3.b, or 3.c are not waters of the state. If an aquatic feature meets the wetland definition, the burden is on the applicant to demonstrate that the wetland is not a water of the state.

3.3.3 California Department of Fish and Wildlife

Pursuant to California Fish and Game Code (FGC) Division 2, Chapter 6, Sections 1600-1603, the CDFW regulates substantial diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake, which supports fish or wildlife.

California regulations define a stream (including creeks and rivers) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports

[3] Fields used for the cultivation of rice (including wild rice) that have not been abandoned due to five consecutive years of non-use for the cultivation of rice (including wild rice) that are determined to be a water of the state in accordance with these Procedures shall not have beneficial use designations applied to them through the Water Quality Control Plan for the Sacramento and San Joaquin River Basins, except as otherwise required by federal law for fields that are considered to be waters of the United States. Further, agricultural inputs legally applied to fields used for the cultivation of rice (including wild rice) shall not constitute a discharge of waste to a water of the state. Agricultural inputs that migrate to a surface water or groundwater may be considered a discharge of waste and are subject to waste discharge requirements or waivers of such requirements pursuant to the Water Board's authority to issue or waive waste discharge requirements or take other actions as applicable.

fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation" (California Code of Regulations [CCR] Title 14 Section 1.72). The definition of a "lake" includes "natural lakes or man-made reservoirs" (CCR Title 14 Section 1.56). The Fish and Game Code defines wildlife to include "all wild animals, birds, plants, fish, amphibians, reptiles, and related ecological communities, including the habitat upon which they depend for continued viability" (FGC Division 0.5, Chapter 1, Section 89.5).

4.0 RESULTS

This section provides the results of general biological surveys, vegetation mapping, habitat assessments for special-status plants and animals, an assessment for MSHCP riparian/riverine areas and vernal pools, and an evaluation for jurisdictional waters and wetlands.

4.1 Existing Conditions

Based on historical aerial photography, the Addendum Offsite Project has been developed for rural residential use, including the presence of a maintained turf lawn, since at least 1985, resulting in extensive ground disturbance. The residence is no longer occupied but regular vegetation maintenance has continued for weed abatement. The topography slopes downward from the northwest to southeast from approximately 1,1426 feet to 1,420 feet above mean sea level. The Addendum Offsite Project exhibits previously graded and highly compacted soils [Exhibit 6 – Soils Map].

4.2 Vegetation/Land Use Mapping

The 0.13-acre Addendum Offsite Project consists of a portion of an unoccupied rural residential property that has been historically subject to disturbance consistent with residential uses including the presence of a turf lawn and periodic mowing. A Vegetation/Land Use Map is attached as Exhibit 7.

4.2.1 Disturbed

Per Holland (1986), the Addendum Offsite Project is best characterized as Disturbed based on the history of residential use and predominance of non-native grasses and forbs. Per MCV (2008), the Addendum Offsite Project is best characterized as *Hordeum murinum* Herbaceous Semi-Natural Alliance (Foxtail Barley Grasslands) in accordance with the membership rules of the MCV. The MCV name for this alliance is *Avena spp. – Bromus spp*. Herbaceous Semi-Natural Alliance, but foxtail barley is the dominant species mapped on the project site and the name has been changed to reflect this. The *Hordeum murinum* Herbaceous Semi-Natural Alliance, as it occurs on the project site, is dominated by foxtail barley at a percent cover that meets or exceeds one MCV membership rule: foxtail barley comprises a minimum of 80 percent relative cover in the herbaceous layer. Co-dominant herbaceous species include brome grasses (*Bromus* spp.) and cheeseweed (*Malva parviflora*).

With the addition of the 0.13-acre Addendum Offsite Project to the 227.89-acre Project analyzed in the 2025 BTR, the Disturbed area totals 27.51 acres.

4.3 Special-Status Plants

Table 4-1 provides a list of special-status plants evaluated for the Addendum Offsite Project through general biological surveys and habitat assessments. Species were evaluated based on the following factors: 1) species identified by the CNDDB and CNPS as occurring (either currently or historically) on or in the vicinity of the Project, and 2) any other special-status plants that are known to occur within the vicinity of the Project, or for which potentially suitable habitat occurs within the site.

Table 4-1. Special-Status Plants Evaluated for the Addendum Offsite Project

Species Name	Status	Habitat Requirements	Occurrence
Alkali marsh aster *Almutaster pauciflorus*	Federal: None State: None CNPS: Rank 2B.2	Meadows and seeps	Does not occur due to a lack of suitable habitat.
Bottle liverwort *Sphaerocarpos drewei*	Federal: None State: None CNPS: Rank 1B.1	Openings in chaparral and coastal scrub.	Does not occur due to a lack of suitable habitat.
California beardtongue *Penstemon californicus*	Federal: None State: None CNPS: Rank 1B.2 MSHCP	Sandy soils in chaparral, lower montane coniferous forest, and pinyon and juniper woodland.	Does not occur due to a lack of suitable habitat.
California Orcutt grass *Orcuttia californica*	Federal: FE State: SE CNPS: Rank 1B.1 MSHCP(b)	Vernal pools. The typical blooming period for this plant is April through June.	Does not occur due to a lack of suitable habitat.
California satintail *Imperata brevifolia*	Federal: None State: None CNPS: Rank 2B.1	Mesic soils in chaparral, coastal scrub, Mojavean desert scrub, meadows and seeps (often alkali), and riparian scrub.	Does not occur due to a lack of suitable habitat.
California screw moss *Tortula californica*	Federal: None State: None CNPS: Rank 1B.2	Sandy soil in chenopod scrub, and valley and foothill grassland.	Does not occur due to a lack of suitable habitat.
Chaparral sand-verbena *Abronia villosa* var. *aurita*	Federal: None State: None CNPS: Rank 1B.1	Sandy soils in chaparral, coastal sage scrub.	Does not occur due to a lack of suitable habitat.
Coulter's goldfields *Lasthenia glabrata* ssp. *coulteri*	Federal: None State: None CNPS: Rank 1B.1 MSHCP(d)	Playas, vernal pools, marshes and swamps (coastal salt). The typical blooming period for this plant is February through June.	Does not occur due to a lack of suitable habitat.
Davidson's saltscale *Atriplex serenana* var. *davidsonii*	Federal: None State: None CNPS: Rank 1B.2 MSHCP(d)	Alkaline soils in coastal sage scrub, coastal bluff scrub. The typical blooming period for this plant is May through October.	Does not occur due to a lack of suitable habitat.
Douglas' fiddleneck *Amsinckia douglasiana*	Federal: None State: None CNPS: Rank 4.2	Dry Monterey shale. Cismontane woodland, valley and foothill grassland.	Does not occur due to a lack of suitable habitat.

Species Name	Status	Habitat Requirements	Occurrence
Engelmann oak *Quercus engelmannii*	Federal: None State: None CNPS: Rank 4.2 MSHCP	Chaparral, cismontane woodland, riparian woodland, valley and foothill grassland.	Does not occur due to a lack of suitable habitat.
Fish's milkwort *Polygala cornuta* var. *fishiae*	Federal: None State: None CNPS: Rank 4.3 MSHCP	Chaparral, cismontane woodland, riparian woodland.	Does not occur due to a lack of suitable habitat.
Graceful tarplant *Holocarpha virgata* ssp. *elongate*	Federal: None State: None CNPS: Rank 4.2 MSHCP	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland.	Does not occur due to a lack of suitable habitat.
Intermediate mariposa-lily *Calochortus weedii* var. *intermedius*	Federal: None State: None CNPS: Rank 1B.2 MSHCP	Rocky soils in chaparral, coastal sage scrub, valley and foothill grassland.	Does not occur due to a lack of suitable habitat.
Jaeger's (bush) milk-vetch *Astragalus pachypus* var. *jaegeri*	Federal: None State: None CNPS: Rank 1B.1 MSHCP	Sandy or rocky soils in chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland.	Does not occur due to a lack of suitable habitat.
Little mousetail *Myosurus minimus* ssp. *apus*	Federal: None State: None CNPS: Rank 3.1 MSHCP(d)	Valley and foothill grassland, vernal pools (alkaline soils). The typical blooming period for this plant is April through May.	Does not occur due to a lack of suitable habitat.
Little-leaved palo verde *Parkinsonia microphylla*	Federal: None State: None CNPS: Rank 4.3	Rocky or gravelly soils in Mojavean desert scrub.	Does not occur due to a lack of suitable habitat.
Long-spined spineflower *Chorizanthe polygonoides* var. *longispina*	Federal: None State: None CNPS: Rank 1B.2 MSHCP	Clay soils in chaparral, coastal sage scrub, meadows and seeps, and valley and foothill grasslands.	Does not occur due to a lack of suitable habitat.
Many-stemmed dudleya *Dudleya multicaulis*	Federal: None State: None CNPS: Rank 1B.2	Chaparral, coastal sage scrub, valley and foothill grassland. Often occurring in clay soils. The typical blooming period for this plant is May through June.	Does not occur due to a lack of suitable habitat.
Mission Canyon bluecup *Githopsis diffusa* ssp. *filicaulis*	Federal: None State: None CNPS: Rank 3.1	Chaparral (mecis, disturbed areas)	Does not occur due to a lack of suitable habitat.
Mojave tarplant *Deinandra mohavensis*	Federal: None State: SE CNPS: Rank 1B.3 MSHCP(e)	Chaparral (mesic soils) and riparian scrub.	Does not occur due to a lack of suitable habitat.
Mud nama *Nama stenocarpum*	Federal: None State: None CNPS: Rank 2B.2 MSHCP(d)	Marshes and swamps. The typical blooming period for this plant is January through July.	Does not occur due to a lack of suitable habitat.
Munz's onion *Allium munzii*	Federal: FE State: ST CNPS: Rank 1B.1 MSHCP(b)	Clay soils in chaparral, coastal sage scrub, and valley and foothill grasslands. The typical blooming period for this plant is April through May.	Does not occur due to a lack of suitable habitat.

Species Name	Status	Habitat Requirements	Occurrence
Nevin's barberry *Berberis nevinii*	Federal: FE State: SE CNPS: Rank 1B.1 MSHCP(d)	Sandy or gravelly soils in chaparral, cismontane woodland, coastal scrub, and riparian scrub.	Does not occur due to a lack of suitable habitat.
Palmer's grapplinghook *Harpagonella palmeri*	Federal: None State: None CNPS: Rank 4.2 MSHCP	Chaparral, coastal sage scrub, valley and foothill grassland. Occurring in clay soils.	Does not occur due to a lack of suitable habitat.
Palomar monkeyflower *Erythranthe (Mimulus) diffusa*	Federal: None State: None CNPS: Rank 4.3 MSHCP	Sandy or gravelly soils in chaparral, lower montane coniferous forest.	Does not occur due to a lack of suitable habitat.
Paniculate tarplant *Deinandra paniculata*	Federal: None State: None CNPS: Rank 4.2	Usually in vernally mesic, sometimes sandy soils in coastal scrub, valley and foothill grassland, and vernal pools.	Does not occur due to a lack of suitable habitat.
Parish's brittlescale *Atriplex parishii*	Federal: None State: None CNPS: Rank 1B.1 MSHCP(d)	Chenopod scrub, playas, vernal pools. The typical blooming period for this plant is June through October.	Does not occur due to a lack of suitable habitat.
Parry's spineflower *Chorizanthe parryi* var. *parryi*	Federal: None State: None CNPS: Rank 1B.1	Sandy or rocky soils in open habitats of chaparral and coastal sage scrub.	Does not occur due to a lack of suitable habitat.
Payson's jewelflower *Caulanthus simulans*	Federal: None State: None CNPS: Rank 4.2	Sandy or granitic soils in chaparral and coastal scrub.	Does not occur due to a lack of suitable habitat.
Peninsular spineflower *Chorizanthe leptotheca*	Federal: None State: None CNPS: Rank 4.2 MSHCP	Alluvial fan, granitic. Chaparral, coastal scrub, lower montane coniferous forest.	Does not occur due to a lack of suitable habitat.
Plummer's mariposa lily *Calochortus plummerae*	Federal: None State: None CNPS: Rank 4.2 MSHCP	Granitic, rock soils within chaparral, cismontane woodland, coastal sage scrub, lower montane coniferous forest, valley and foothill grassland.	Does not occur due to a lack of suitable habitat.
Pride-of-California *Lathyrus splendens*	Federal: None State: None CNPS: Rank 4.3	Chaparral	Does not occur due to a lack of suitable habitat.
Prostrate vernal pool navarretia *Navarretia prostrata*	Federal: None State: None CNPS: Rank 1B.1 MSHCP(d)	Coastal sage scrub, valley and foothill grassland (alkaline), vernal pools. Occurring in mesic soils.	Does not occur due to a lack of suitable habitat.
Rainbow manzanita *Arctostaphylos rainbowensis*	Federal: None State: None CNPS: Rank 1B.1 MSHCP	Chaparral	Does not occur due to a lack of suitable habitat.
Robinson's pepper grass *Lepidium virginicum* var. *robinsonii*	Federal: None State: None CNPS: Rank 4.3	Dry openings in chaparral and coastal sage scrub.	Does not occur due to a lack of suitable habitat.

Species Name	Status	Habitat Requirements	Occurrence
Round-leaved filaree *California macrophylla*	Federal: None State: None CNPS: Rank 1B.1 MSHCP(d)	Clay soils in cismontane woodland, valley and foothill grassland. The typical blooming period for this plant is March through May.	Does not occur due to a lack of suitable habitat.
Salt Spring checkerbloom *Sidalcea neomexicana*	Federal: None State: None CNPS: Rank 2B.2	Mesic, alkaline soils in chaparral, coastal sage scrub, lower montane coniferous forest, Mojavean desert scrub, and playas.	Does not occur due to a lack of suitable habitat.
San Bernardino aster *Symphyotrichum defoliatum*	Federal: None State: None CNPS: Rank 1B.2	Cismontane woodland, coastal scrub, lower montane coniferous forest, meadows and seeps, marshes and swamps, valley and foothill grassland (vernally mesic).	Does not occur due to a lack of suitable habitat.
San Diego ambrosia *Ambrosia pumila*	Federal: FE State: None CNPS: Rank 1B.1 MSHCP(b)	Chaparral, coastal sage scrub, valley and foothill grassland, vernal pools. Often in disturbed habitats. The typical blooming period for this plant is April through October.	Does not occur due to a lack of suitable habitat.
San Diego button-celery *Eryngium aristulatum* var. *parishii*	Federal: FE State: SE CNPS: Rank 1B.1 MSHCP	Mesic soils in vernal pools, valley and foothill grasslands, coastal sage scrub.	Does not occur due to a lack of suitable habitat.
San Jacinto Valley crownscale *Atriplex coronata* var. *notatior*	Federal: FE State: None CNPS: Rank 1B.1 MSHCP(d)	Alkaline soils in chenopod scrub, valley and foothill grassland, vernal pools.	Does not occur due to a lack of suitable habitat.
San Miguel savory *Clinopodium chandleri*	Federal: None State: None CNPS: Rank 1B.2 MSHCP(b)	Rocky, gabbroic, or metavolcanic soils in chaparral, cismontane woodland, coastal sage scrub, riparian woodland, valley and foothill grassland.	Does not occur due to a lack of suitable habitat.
Santa Lucia dwarf rush *Juncus luciensis*	Federal: None State: None CNPS: Rank 1B.2	Chaparral, Great Basin scrub, lower montane coniferous forest, meadows and seeps, and vernal pools.	Does not occur due to a lack of suitable habitat.
Santa Rosa Basalt brodiaea *Brodiaea santarosae*	Federal: None State: None CNPS: Rank 1B.2	Basaltic soils in valley and foothill grassland.	Does not occur due to a lack of suitable habitat.
Slender-horned spineflower *Dodecahema leptoceras*	Federal: FE State: SE CNPS: Rank 1B.1 MSHCP(b)	Sandy soils in alluvial scrub, chaparral, cismontane woodland.	Does not occur due to a lack of suitable habitat.
Small-flowered microseris *Microseris douglasii* ssp. *platycarpha*	Federal: None State: None CNPS: Rank 4.2 MSHCP	Cismontane woodland, coastal sage scrub, valley and foothill grassland, vernal pools. Occurring on clay soils.	Does not occur due to a lack of suitable habitat.
Small-flowered morning-glory *Convolvulus simulans*	Federal: None State: None CNPS: Rank 4.2 MSHCP	Chaparral (openings), coastal sage scrub, valley and foothill grassland. Occurring on clay soils and serpentinite seeps.	Does not occur due to a lack of suitable habitat.

Species Name	Status	Habitat Requirements	Occurrence
Smooth tarplant *Centromadia pungens* ssp. *laevis*	Federal: None State: None CNPS: Rank 1B.1 MSHCP(d)	Alkaline soils in chenopod scrub, meadows and seeps, playas, riparian woodland, valley and foothill grasslands, disturbed habitats. The typical blooming period for this plant is April through November.	Does not occur due to a lack of suitable habitat.
Southern California black walnut *Juglans californica*	Federal: None State: None CNPS: Rank 4.2 MSHCP	Chaparral, cismontane woodland, coastal sage scrub, alluvial surfaces.	Does not occur due to a lack of suitable habitat.
Southern mountains skullcap *Scutellaria bolanderi* ssp. *austromontana*	Federal: None State: None CNPS: Rank 1B.2	Mesic soils in chaparral, cismontane woodland, lower montane coniferous forest.	Does not occur due to a lack of suitable habitat.
Southwestern spiny rush *Juncus acutus* ssp. *leopoldii*	Federal: None State: None CNPS: Rank 4.2	Coastal dunes (mesic), meadows and seeps (alkaline seeps), and marshes and swamps (coastal salt).	Does not occur due to a lack of suitable habitat.
Spreading navarretia *Navarretia fossalis*	Federal: FT State: None CNPS: Rank 1B.1 MSHCP(b)	Vernal pools, playas, chenopod scrub, marshes and swamps (assorted shallow freshwater). The typical blooming period for this plant is May through June.	Does not occur due to a lack of suitable habitat.
Thread-leaved brodiaea *Brodiaea filifolia*	Federal: FT State: SE CNPS: Rank 1B.1	Clay soils in chaparral (openings), cismontane woodland, coastal sage scrub, playas, valley and foothill grassland, vernal pools. The typical blooming period for this plant is May through June.	Does not occur due to a lack of suitable habitat.
Vernal barley *Hordeum intercedens*	Federal: None State: None CNPS: Rank 3.2 MSHCP	Coastal dunes, coastal sage scrub, valley and foothill grassland (saline flats and depressions), vernal pools.	Does not occur due to a lack of suitable habitat.
White rabbit-tobacco *Pseudognaphalium leucocephalum*	Federal: None State: None CNPS: Rank 2B.2	Sandy or gravelly soils in chaparral, cismontane woodland, coastal scrub, and riparian woodland.	Does not occur due to a lack of suitable habitat.
Wiggins' cryptantha *Cryptantha wigginsii*	Federal: None State: None CNPS: Rank 1B.2	Often on clay soils in coastal scrub.	Does not occur due to a lack of suitable habitat.
Woven-spored lichen *Texosporium sancti-jacobi*	Federal: None State: None CNPS: Rank 3	On soil, small mammal pellets, dead twigs, and on *Selaginella* spp. Chaparral (openings).	Does not occur due to a lack of suitable habitat.
Wright's trichocoronis *Trichocoronis wrightii* var. *wrightii*	Federal: None State: None CNPS: Rank 2B.1 MSHCP(b)	Alkaline soils in meadows and seeps, marshes and swamps, riparian scrub, vernal pools. The typical blooming period for this plant is May through September.	Does not occur due to a lack of suitable habitat.
Yucaipa onion *Allium marvinii*	Federal: None State: None CNPS: Rank 1B.2	Chaparral (clay, openings).	Does not occur due to a lack of suitable habitat.

STATUS

Federal	**State**
FE – Federally Endangered	SE – State Endangered
FT – Federally Threatened	ST – State Threatened

California Rare Plant Rank
Rank 1A – Plants presumed extirpated in California and either rare or extinct elsewhere.
Rank 1B – Plants rare, threatened, or endangered in California and elsewhere.
Rank 2A – Plants presumed extirpated in California, but common elsewhere.
Rank 2B – Plants rare, threatened, or endangered in California, but more common elsewhere.
Rank 3 – Plants about which more information is needed (a review list).
Rank 4 – Plants of limited distribution (a watch list).

Threat Code extension
.1 – Seriously endangered in California (over 80% occurrences threatened)
.2 – Fairly endangered in California (20-80% occurrences threatened)
.3 – Not very endangered in California (<20% of occurrences threatened or no current threats known)

MSHCP
MSHCP = No additional action necessary
MSHCP(a) = Surveys may be required as part of wetlands mapping
MSHCP(b) = Surveys may be required within the Narrow Endemic Plant Species survey area
MSHCP(c) = Surveys may be required within locations shown on survey maps
MSHCP(d) = Surveys may be required within Criteria Area
MSHCP(e) = Conservation requirements identified in species-specific conservation objectives need to be met before classified as a Covered Species
MSHCP(f) = Covered species when a Memorandum of Understanding is executed with the Forest Service Land

OCCURRENCE

- Does not occur – The site does not contain habitat for the species and/or the site is not within the geographic range of the species.
- Absent – The site contains suitable habitat for the species, and the species was not detected. Additionally, in the case of annual species or perennial species that emerge annually from bulbs or other underground structures, the surveys were performed during the appropriate blooming periods and during a timeframe following adequate precipitation.
- Not detected – The site contains suitable habitat for the species, and the species was not detected during focused surveys performed during the appropriate blooming periods, but due to below normal precipitation, the lack of detection may not indicate absence. This applies to annual species or perennial species that emerge annually from bulbs or other underground structures.
- Potential to occur – The species has a potential to occur based on suitable habitat; however, its presence/absence has not been confirmed.
- Present – The species was detected onsite incidentally or through focused surveys

4.3.1 Special-Status Plants Summary

Based on the history of disturbance in the Addendum Offsite Project consistent with rural residential land use, no special-status plants have potential to occur in the Addendum Offsite Project.

4.4 Special-Status Animals

Table 4-2 provides a list of special-status animals evaluated for the onsite and offsite Project through general biological surveys, habitat assessments, and focused surveys. Species were evaluated based on the following factors, including: 1) species identified by the CNDDB as occurring (either currently or historically) on or in the vicinity of the onsite and offsite Project, 2) applicable MSHCP survey areas, and 3) any other special-status animals that are known to occur within the vicinity of the onsite and offsite Project or for which potentially suitable habitat occurs on the site.

Table 4-2. Special-Status Animals Evaluated for the Project

Species Name	Status	Habitat Requirements	Occurrence
Invertebrates			
Crotch's bumble bee *Bombus crotchii*	Federal: None State: SCE	Relatively warm and dry sites, including the inner Coast Range of California and margins of the Mojave Desert.	Absent from 227.89-acre Project (2025 BTR); no floral resources present in Addendum Offsite Project in 2026. See discussion below in Section 4.5.1.
Quino checkerspot butterfly *Euphydryas quino*	Federal: FE State: None MSHCP	Larval and adult phases each have distinct habitat requirements tied to host plant species and topography. Larval host plants include *Plantago erecta* and *Castilleja exserta*. Adults occur on sparsely vegetated rounded hilltops and ridgelines and are known to disperse through disturbed habitats to reach suitable nectar plants.	Does not occur due to a lack of suitable habitat.
Riverside fairy shrimp *Streptocephalus woottoni*	Federal: FE State: None MSHCP(a)	Restricted to deep seasonal vernal pools, vernal pool-like ephemeral ponds, and stock ponds.	Does not occur due to a lack of suitable habitat.
San Diego fairy shrimp *Branchinecta sandiegonensis*	Federal: FE State: None	Seasonal vernal pools	Does not occur due to a lack of suitable habitat.
Santa Rosa Plateau fairy shrimp *Linderiella santarosae*	Federal: None State: None MSHCP(a)	Resides in Southern Basalt Flow vernal pools ranging from 25 to over 100,000 square meters in area.	Does not occur due to a lack of suitable habitat.
Vernal pool fairy shrimp *Branchinecta lynchi*	Federal: FT State: None MSHCP(a)	Seasonal vernal pools.	Does not occur due to a lack of suitable habitat.
Fish			
Arroyo chub *Gila orcutti*	Federal: None State: SSC MSHCP	Slow-moving or backwater sections of warm to cool streams with substrates of sand or mud.	Does not occur due to a lack of suitable habitat.

Species Name	Status	Habitat Requirements	Occurrence
Amphibians			
Coast Range newt *Taricha torosa*	Federal: None State: SSC	Found in wet forests, oak forests, chaparral, and rolling grasslands. In southern California, drier chaparral, oak woodland, and grasslands are used.	Does not occur due to a lack of suitable habitat.
Western spadefoot *Spea hammondii*	Federal: FPT State: SSC MSHCP	Seasonal pools in coastal sage scrub, chaparral, and grassland habitats.	Does not occur due to a lack of suitable habitat.
Reptiles			
California glossy snake *Arizona elegans occidentalis*	Federal: None State: SSC	Inhabits arid scrub, rocky washes, grasslands, chaparral.	Does not occur due to a lack of suitable habitat.
Coast horned lizard *Phrynosoma blainvillii*	Federal: None State: SSC MSHCP	Occurs in a variety of vegetation types including coastal sage scrub, chaparral, annual grassland, oak woodland, and riparian woodlands.	Does not occur due to a lack of suitable habitat.
Coast patch-nosed snake *Salvadora hexalepis virgultea*	Federal: None State: SSC	Occurs in coastal chaparral, desert scrub, washes, sandy flats, and rocky areas.	Does not occur due to a lack of suitable habitat.
Coastal whiptail *Aspidoscelis tigris stejnegeri (multiscutatus)*	Federal: None State: SSC MSHCP	Open, often rocky areas with little vegetation, or sunny microhabitats within shrub or grassland associations.	Potential to occur
Orangethroat whiptail *Aspidoscelis hyperythra*	Federal: None State: WL MSHCP	Coastal sage scrub, chaparral, non-native grassland, oak woodland, and juniper woodland.	Potential to occur
Red-diamond rattlesnake *Crotalus ruber*	Federal: None State: SSC MSHCP	Habitats with heavy brush and rock outcrops, including coastal sage scrub and chaparral.	Does not occur due to a lack of suitable habitat.
San Diego banded gecko *Coleonyx variegatus abbotti*	Federal: None State: SSC MSHCP	Primarily a desert species, but also occurs in cismontane chaparral, desert scrub, and open sand dunes.	Does not occur due to a lack of suitable habitat.
Southern California legless lizard *Anniella stebbinsi*	Federal: None State: SSC	Broadleaved upland forest, chaparral, coastal dunes, coastal scrub; found in a broader range of habitats that any of the other species in the genus. Often locally abundant, specimens are found in coastal sand dunes and a variety of interior habitats, including sandy washes and alluvial fans	Does not occur due to a lack of suitable habitat.
Two-striped gartersnake *Thamnophis hammondii*	Federal: None State: SSC	Aquatic snake typically associated with wetland habitats such as streams, creeks, and pools.	Does not occur due to a lack of suitable habitat.
Western pond turtle *Emys marmorata*	Federal: FPT State: SSC MSHCP	Slow-moving permanent or intermittent streams, small ponds and lakes, reservoirs, abandoned gravel pits, permanent and ephemeral shallow wetlands, stock ponds, and treatment lagoons. Abundant basking sites and cover necessary, including logs, rocks, submerged vegetation, and undercut banks.	Does not occur due to a lack of suitable habitat.

Species Name	Status	Habitat Requirements	Occurrence
Birds			
Bald eagle (nesting & wintering) *Haliaeetus leucocephalus*	Federal: None State: SE, FP MSHCP	Primarily in or near seacoasts, rivers, swamps, and large lakes. Perching sites consist of large trees or snags with heavy limbs or broken tops.	Does not occur due to a lack of suitable habitat.
Bell's sage sparrow *Artemisiospiza belli*	Federal: None State: WL MSHCP	Chaparral and coastal sage scrub along the coastal lowlands, inland valleys, and in the lower foothills of local mountains.	Potential to occur for foraging
Bendire's thrasher *Toxostroma bendirei*	Federal: None State: SSC	Desert, especially areas of tall vegetation, cholla cactus, creosote bush and yucca, and in juniper woodland.	Does not occur due to a lack of suitable habitat.
Burrowing owl (burrow sites & some wintering sites) *Athene cunicularia*	Federal: None State: SC, SSC MSHCP(c)	Shortgrass prairies, grasslands, lowland scrub, agricultural lands (particularly rangelands), coastal dunes, desert floors, and some artificial, open areas as a year-long resident. Occupies abandoned ground squirrel burrows as well as artificial structures such as culverts and underpasses.	Absent
California horned lark *Eremophila alpestris actia*	Federal: None State: WL MSHCP	Occupies a variety of open habitats, usually where trees and large shrubs are absent.	Present in 227.89-acre Project area (2025 BTR)
Coastal California gnatcatcher *Polioptila californica californica*	Federal: FT State: SSC MSHCP	Low elevation coastal sage scrub and coastal bluff scrub.	Does not occur due to a lack of suitable habitat.
Cooper's hawk (nesting) *Accipiter cooperii*	Federal: None State: WL MSHCP	Primarily occurs in riparian areas and oak woodlands, most commonly in montane canyons. Known to use urban areas, occupying trees among residential and commercial.	Does not occur due to a lack of suitable habitat.
Ferruginous hawk (wintering) *Buteo regalis*	Federal: None State: WL MSHCP	Open, dry country, perching on trees, posts, and mounds. In California, wintering habitat consists of open terrain and grasslands of the plains and foothills.	Does not occur due to a lack of suitable habitat.
Golden eagle (nesting & wintering) *Aquila chrysaetos*	Federal: None State: FP MSHCP	In southern California, occupies grasslands, brushlands, deserts, oak savannas, open coniferous forests, and montane valleys. Nests on rock outcrops and ledges.	Does not occur due to a lack of suitable habitat.
Least Bell's vireo (nesting) *Vireo bellii pusillus*	Federal: FE State: SE MSHCP(a)	Dense riparian habitats with a stratified canopy, including southern willow scrub, mule fat scrub, and riparian forest.	Does not occur due to a lack of suitable habitat.

Species Name	Status	Habitat Requirements	Occurrence
Loggerhead shrike (nesting) *Lanius ludovicianus*	Federal: None State: SSC MSHCP	Forages over open ground within areas of short vegetation, pastures with fence rows, old orchards, mowed roadsides, cemeteries, golf courses, riparian areas, open woodland, agricultural fields, desert washes, desert scrub, grassland, broken chaparral and beach with scattered shrubs.	Potential to occur for foraging only.
Northern harrier (nesting) *Circus hudsonius*	Federal: None State: SSC MSHCP	A variety of habitats, including open wetlands, grasslands, wet pasture, old fields, dry uplands, and croplands.	Present in the 227.89-acre Project (2025 BTR)
Southern California rufous-crowned sparrow *Aimophila ruficeps canescens*	Federal: None State: WL MSHCP	Grass covered hillsides, coastal sage scrub, and chaparral.	Does not occur due to a lack of suitable habitat.
Southwestern willow flycatcher (nesting) *Empidonax traillii extimus*	Federal: FE State: SE MSHCP(a)	Riparian woodlands along streams and rivers with mature dense thickets of trees and shrubs.	Does not occur due to a lack of suitable habitat.
Swainson's hawk (nesting) *Buteo swainsoni*	Federal: None State: ST MSHCP	Summer in wide open spaces of the American West. Nest in grasslands but can use sage flats and agricultural lands. Nests are placed in lone trees.	Does not occur due to a lack of suitable habitat.
Tricolored blackbird (nesting colony) *Agelaius tricolor*	Federal: None State: ST, SSC MSHCP	Breeding colonies require nearby water, a suitable nesting substrate, and open-range foraging habitat of natural grassland, woodland, or agricultural cropland.	Does not occur due to a lack of suitable habitat.
Western yellow-billed cuckoo (nesting) *Coccyzus americanus occidentalis*	Federal: FT State: SE MSHCP(a)	Dense, wide riparian woodlands with well-developed understories.	Does not occur due to a lack of suitable habitat.
White-faced ibis (nesting colony) *Plegadis chihi*	Federal: None State: WL MSHCP	Winter foraging occurs in wet meadows, marshes, ponds, lakes, rivers, and agricultural fields. Requires extensive marshes for nesting.	Does not occur due to a lack of suitable habitat.
White-tailed kite (nesting) *Elanus leucurus*	Federal: None State: FP MSHCP	Low elevation open grasslands, savannah-like habitats, agricultural areas, wetlands, and oak woodlands. Dense canopies used for nesting and cover.	Potential to occur for foraging
Yellow warbler (nesting) *Setophaga petechia*	Federal: None State: SSC MSHCP	Breed in lowland and foothill riparian woodlands dominated by cottonwoods, alders, or willows and other small trees and shrubs typical of low, open-canopy riparian woodland. During migration, forages in woodland, forest, and shrub habitats.	Does not occur due to a lack of suitable habitat.
Yellow-headed blackbird (nesting) *Xanthocephalus xanthocephalus*	Federal: None State: SSC	Breed and roost in freshwater wetlands with dense, emergent vegetation such as cattails. Often forage in fields, typically wintering in large, open agricultural areas.	Does not occur due to a lack of suitable habitat.

Species Name	Status	Habitat Requirements	Occurrence
Mammals			
American badger *Taxidea taxus*	Federal: None State: SSC	Most abundant in drier open stages of most scrub, forest, and herbaceous habitats, with friable soils.	Present in the 227.89-acre Project (2025 BTR)
Dulzura pocket mouse *Chaetodipus californicus femoralis*	Federal: None State: SSC	Coastal scrub, grassland, and chaparral, especially at grass-chaparral edges	Does not occur due to a lack of suitable habitat.
Jacumba pocket mouse *Perognathus longimembris internationalis*	Federal: None State: SSC	Arid plains and desert-like country. Grassland, alluvial sage scrub, and coastal sage scrub.	Does not occur due to a lack of suitable habitat.
Los Angeles pocket mouse *Perognathus longimembris brevinasus*	Federal: None State: SSC MSHCP(c)	Fine, sandy soils in coastal sage scrub and grasslands.	Does not occur due to a lack of suitable habitat.
Northwestern San Diego pocket mouse *Chaetodipus fallax fallax*	Federal: None State: SSC MSHCP	Coastal sage scrub, sage scrub/grassland ecotones, and chaparral.	Does not occur due to a lack of suitable habitat.
Pallid bat *Antrozous pallidus*	Federal: None State: SSC WBWG: H	Deserts, grasslands, shrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting.	Does not occur due to a lack of suitable habitat.
San Bernardino kangaroo rat *Dipodomys merriami parvus*	Federal: FE State: SSC MSHCP(c)	Typically found in Riversidean alluvial fan sage scrub and sandy loam soils, alluvial fans and floodplains, and along washes with nearby sage scrub.	Does not occur due to a lack of suitable habitat.
San Diego black-tailed jackrabbit *Lepus californicus bennettii*	Federal: None State: None MSHCP	Occupies a variety of habitats but is most common among shortgrass habitats. Also occurs in sage scrub but needs open habitats.	Does not occur due to a lack of suitable habitat.
San Diego desert woodrat *Neotoma lepida intermedia*	Federal: None State: SSC MSHCP	Occurs in a variety of shrub and desert habitats, primarily associated with rock outcrops, boulders, cacti, or areas of dense undergrowth.	Does not occur due to a lack of suitable habitat.
Southern grasshopper mouse *Onychomys torridus ramona*	Federal: None State: SSC	Desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover.	Does not occur due to a lack of suitable habitat.
Stephens' kangaroo rat *Dipodomys stephensi*	Federal: FE State: ST MSHCP	Open grasslands or sparse shrublands with less than 50% vegetation cover during the summer.	Does not occur due to a lack of suitable habitat.
Western mastiff bat *Eumops perotis californicus*	Federal: None State: SSC	Occurs in many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces, high buildings, trees, and tunnels.	Does not occur due to a lack of suitable habitat.
Western yellow bat *Lasiurus xanthinus*	Federal: None State: SSC	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees, particularly palms. Forages over water and among trees.	Does not occur due to a lack of suitable habitat.

STATUS

Federal
FE – Federally Endangered
FT – Federally Threatened
FPT – Federally Proposed Threatened

State
SE – State Endangered
ST – State Threatened
SCE – State Candidate Endangered
FP – Fully-Protected Species
SSC – Species of Special Concern

MSHCP
MSHCP = No additional action necessary
MSHCP(a) = Surveys may be required as part of wetlands mapping
MSHCP(b) = Surveys may be required within the Narrow Endemic Plant Species survey area
MSHCP(c) = Surveys may be required within locations shown on survey maps
MSHCP(d) = Surveys may be required within Criteria Area
MSHCP(e) = Conservation requirements identified in species-specific conservation objectives need to be met before classified as a Covered Species
MSHCP(f) = Covered species when a Memorandum of Understanding is executed with the Forest Service Land

OCCURRENCE

- Does not occur – The site does not contain habitat for the species and/or the site does not occur within the geographic range of the species.
- Absent – The site contains suitable habitat for the species, but the species has been confirmed absent through focused surveys that followed an accepted protocol.
- Not detected – The site contains suitable habitat for the species. Although there is no defined survey protocol for the species, it was not detected while conducting protocol surveys for other species that utilize the same habitat.
- Potential to occur – The species has a potential to occur based habitat suitability and species range. Although it was not observed during surveys, the lack of detection cannot be interpreted as absence.
- Present – The species was detected onsite incidentally or through focused surveys

4.4.1 Special-Status Animal Summary

No special-status species are newly identified as having potential to occur in the 0.13-acre Addendum Offsite Project; all special-status species with potential to occur in the Addendum Offsite Project area were addressed by the 2025 BTR.

As documented in the 2025 BTR, three special-status animals were detected at the 227.89-acre Project during surveys in 2021 and/or 2025: California horned lark, northern harrier (foraging only), and American badger. All three of these species utilize grasslands and disturbed habitats and have low potential to occur in the Addendum Offsite Project area.

Five species that were identified by the 2025 BTR as having potential to occur in the 227.89-acre Project site and utilize grasslands and disturbed areas also have low potential to occur in the Addendum Offsite Project: coastal whiptail, orangethroat whiptail, Bell's sage sparrow (foraging only), loggerhead shrike (foraging only), and white-tailed kite (foraging only).

Two wildlife species, burrowing owl and Crotch's bumble bee (CBB), were confirmed absent from the 227.89-acre Project through focused surveys, though the overall Project area contains suitable habitat for both species and therefore have a potential to occur in the future. Burrowing owls were not detected in the Addendum area during visual (binocular) surveys performed as

part of the Project's focused surveys and are not expected to specifically occupy the Addendum area due to the absence of suitable burrows. Regarding CBB, suitable floral resources for feeding were not detected in the Addendum area during the February 2026 visit, and so the Addendum area is not expected to support foraging CBB individuals. Additionally, the finding of absence for CBB in 2025 for the 227.89-acre Project would also have applied to the Addendum area based on the lack of floral resources observed in offsite Project immediately north of the Addendum area in 2025 and the Addendum area itself in 2026. The Addendum area contains pocket gopher burrows that would have potential to support a CBB nest; however, it is unlikely that CBB would nest within the addendum area compared with more suitable lands within the overall onsite Project, and so CBB would not occur solely within the addendum area.

4.5 Raptor Use

The Project provides suitable foraging habitat for a number of raptor species, including special-status raptors as discussed above.

Southern California contains a diversity of birds of prey (raptors), many species of which are in decline. For most of the declining species, foraging requirements include extensive open, undisturbed, or lightly disturbed areas, especially grasslands. This type of habitat has declined severely in the region, affecting many species but especially raptors. A few species such as American kestrel (*Falco sparverius*) and red-tailed hawk (*Buteo jamaicensis*) are somewhat adaptable to low-level human disturbance and can be readily observed adjacent to neighborhoods and other types of development. These species still require appropriate foraging habitat and low levels of disturbance in the vicinity of nesting sites.

Many of the raptors that would be expected to forage and nest within western Riverside are fully covered species under the MSHCP, with the MSHCP providing the necessary conservation of both foraging and nesting habitats. Some common raptor species (e.g., American kestrel and red-tailed hawk) are not covered by the MSHCP but are expected to be conserved with implementation of the Plan due to the parallel habitat needs with those raptors covered under the Plan. The MSHCP does not provide Fish and Game Code take coverage for raptors covered under the Plan.

Similar to the overall 227.89-acre Project area, the 0.13-acre Addendum Offsite Project lacks potential nesting habitat (e.g., mature trees, shrubs) for raptor species but is expected to provide marginal foraging opportunities in the form of insects, spiders, lizards, snakes, small mammals, and other birds as discussed above.

4.6 Nesting Birds

The Addendum Offsite Project contains trees, shrubs, and ground cover that provides suitable habitat for nesting migratory birds. Mortality of migratory birds (including eggs) is prohibited under California Fish and Game Code.[4]

[4] Sections 3505, 3503.5, and 3513 of the California Department of Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs.

4.7 Wildlife Linkages/ Corridors and Nursery Sites

The Project is conserving 61.42 acres of land within the northern half of the onsite Project to assist with the assembly of Proposed Constrained Linkage 17 (PCL-17). This land dedication is consistent with MSHCP requirements and has been approved by the RCA through the JPR and HANS processes. The southern portion of the onsite Project area and the offsite Project areas, including the 0.13-acre Addendum Offsite Project, do not support regional movement and are not applicable to PCL-17. Additionally, the 0.13-acre Addendum Offsite Project is consistent with the conclusion of the 2025 BTR that no wildlife nursery sites occur on the Project site.

4.8 Critical Habitat

The Addendum Offsite Project does not occur within any lands mapped as Critical Habitat by the USFWS.

4.9 Jurisdictional Waters

The 227.89-acre Project area contains Regional Board and CDFW jurisdictional waters, but no jurisdictional features are present in the 0.13-acre Addendum Offsite Project. As discussed in Section 1.1, the Addendum Offsite Project would avoid a natural drainage course that is located outside of the Addendum Offsite Project area.

4.10 MSHCP Riparian/Riverine Areas and Vernal Pools

The 227.89-acre Project area contains MSHCP Riparian/Riverine Areas but does not contain any Vernal Pools. No MSHCP Riparian/Riverine Areas or Vernal Pools are present in the 0.13-acre Addendum Offsite Project. As discussed in Section 1.1, the Addendum Offsite Project would avoid a natural drainage course that is located outside of the Addendum Offsite Project area.

5.0 IMPACT ANALYSIS

The following discussion examines the potential impacts to plant and wildlife resources that would occur as a result of the proposed project. Impacts (or effects) can occur in two forms, direct and indirect. Direct impacts are considered to be those that involve the loss, modification or disturbance of plant communities, which in turn, directly affect the flora and fauna of those habitats. Direct impacts also include the destruction of individual plants or animals, which may also directly affect regional population numbers of a species or result in the physical isolation of populations thereby reducing genetic diversity and population stability.

Indirect impacts pertain to those impacts that result in a change to the physical environment, but which is not immediately related to a project. Indirect (or secondary) impacts are those that are reasonably foreseeable and caused by a project but occur at a different time or place. Indirect impacts can occur at the urban/wildland interface of projects, to biological resources located downstream from projects, and other offsite areas where the effects of the project may be experienced by plants and wildlife. Examples of indirect impacts include the effects of increases

in ambient levels of noise or light; predation by domestic pets; competition with exotic plants and animals; introduction of toxics, including pesticides; and other human disturbances such as hiking, off-road vehicle use, unauthorized dumping, etc. Indirect impacts are often attributed to the subsequent day-to-day activities associated with project build-out, such as increased noise, the use of artificial light sources, and invasive ornamental plantings that may encroach into native areas. Indirect effects may be both short-term and long-term in their duration. These impacts are commonly referred to as "edge effects" and may result in a slow replacement of native plants by non-native invasive species, as well as changes in the behavioral patterns of wildlife and reduced wildlife diversity and abundance in habitats adjacent to project sites. Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. A cumulative impact can occur from multiple individual effects from the same project, or from several projects. The cumulative impact from several projects is the change in the environment resulting from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

5.1 California Environmental Quality Act

5.1.1 Thresholds of Significance

Environmental impacts to biological resources are assessed using impact significance threshold criteria, which reflect the policy statement contained in CEQA, Section 21001(c) of the California Public Resources Code. Accordingly, the State Legislature has established it to be the policy of the State of California:

> *"Prevent the elimination of fish or wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities..."*

Determining whether a project may have a significant effect, or impact, plays a critical role in the CEQA process. According to CEQA, Section 15064.7 (Thresholds of Significance), each public agency is encouraged to develop and adopt (by ordinance, resolution, rule, or regulation) thresholds of significance that the agency uses in the determination of the significance of environmental effects. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant. In the development of thresholds of significance for impacts to biological resources CEQA provides guidance primarily in Section 15065, Mandatory Findings of Significance, and the CEQA Guidelines, Appendix G, Environmental Checklist Form. Section 15065(a) states that a project may have a significant effect where:

> *"The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to*

eliminate a plant or wildlife community, reduce the number or restrict the range of an endangered, rare, or threatened species, ...”

Therefore, for the purpose of this analysis, impacts to biological resources are considered potentially significant (before considering offsetting mitigation measures) if one or more of the following criteria discussed below would result from implementation of the proposed project.

5.1.2 Criteria for Determining Significance Pursuant to CEQA

Appendix G of the State CEQA guidelines indicate that a project may be deemed to have a significant effect on the environment if the project is likely to:

a) 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 the California Department of Fish and Game or U.S. Fish and Wildlife Service.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) 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.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Appendix G(a) of the CEQA guidelines asks if a project is likely to “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 the California Department of Fish and Game (now CA Department of Fish and Wildlife) or U.S. Fish and Wildlife Service.”

5.2 Special-Status Species

Appendix G(a) of the CEQA guidelines asks if a project is likely to “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 the California Department of Fish and Game or U.S. Fish and Wildlife Service."

5.2.1 Impacts to Special-Status Plants

No special-status plants have potential to occur in the Addendum Offsite Project, and therefore no additional impacts to special-status plants will occur relative to the impacts discussed in the 2025 BTR.

5.2.2 Impacts to Special-Status Animals

The 2025 BTR acknowledged the presence (or potential presence) of special-status species with the potential to occur in the 0.13-acre Addendum Offsite Project including coastal whiptail, orangethroat whiptail, Bell's sage sparrow, California horned lark, loggerhead shrike, northern harrier, white-tailed kite, and American badger. The 0.13-acre Addendum Offsite Project will not impact habitat for special-status species that were not already addressed for the overall Project and will not result in potentially significant impacts to wildlife species beyond that which was identified in the 2025 BTR.

5.3 Sensitive Vegetation Communities

Appendix G(b) of the CEQA guidelines asks if a project is likely to "have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service."

Development of the Addendum Offsite Project will not impact sensitive vegetation communities.

5.4 Wetlands

Appendix G(c) of the State CEQA guidelines asks if a project is likely to "have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means."

The Addendum Offsite Project does not contain any state or federally protected wetlands; therefore, no impacts to state or federally protected wetlands would occur as a result of the addition of the Addendum Offsite Project area.

5.5 Wildlife Movement and Native Wildlife Nursery Sites

Appendix G (d) of the State CEQA guidelines asks if a project is likely to "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."

The Project Proponent is conserving 61.42 acres of land within the northern half of the onsite Project to assist with the assembly of Proposed Constrained Linkage 17 (PCL-17). This land dedication is consistent with MSHCP requirements and has been approved by the RCA through the JPR and HANS processes.

The Addendum Offsite Project is not within areas required to support PCL-17 and will not otherwise impact native resident or migratory wildlife corridors.

Additionally, the Addendum Offsite Project will not impact wildlife nursery sites.

5.6 Local Policies or Ordinances

Appendix G(e) of the State CEQA guidelines asks if a project is likely to "conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance." The Project will not conflict with any local policies or ordinances protecting biological resources.

Chapter 12.24 of the Riverside County Code of Ordinances includes regulations for the removal of native trees. Specifically, Riverside County Ordinance No. 559 (as amended through 559.7), requires a permit for the removal of living native trees on parcels or property greater than 0.5 acre in size, located in the unincorporated Riverside County, and above 5,000 feet in elevation. As with the overall Project, the Addendum Offsite Project elevation is below 5,000 feet. As such, Riverside County Ordinance No. 559 (as amended through 559.7) is not applicable to the proposed Project.

5.7 Habitat Conservation Plans

Appendix G(f) of the State CEQA guidelines asks if a project is likely to "conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan."

The Addendum Offsite Project is within the Western Riverside County MSHCP Plan Area. Section 7.0 of this report analyzes compliance of the Project with the Reserve Assembly and species/habitat requirements of the MSHCP. Impacts to species/habitats in the context of MSHCP requirements are summarized therein. Through compliance with the applicable requirements, the Project will not conflict with the provisions of the MSHCP.

5.8 Jurisdictional Waters

5.8.1 Impacts to Corps Jurisdiction

No Corps jurisdiction is present within the 227.89-acre Project the Addendum Offsite Project. Therefore, the Addendum Offsite Project will not impact Corps jurisdiction.

5.8.2 Impacts to Regional Board Jurisdiction

The 227.89-acre Project analyzed by the 2025 BTR would impact State waters under Regional Board jurisdiction. However, no State waters are present within Addendum Offsite Project. Therefore, the addition of the Addendum Offsite Project to the proposed Project would not increase impacts to Regional Board jurisdiction analyzed by the 2025 BTR.

5.8.3 Impacts to CDFW Jurisdiction

The 227.89-acre Project analyzed by the 2025 BTR would impact CDFW jurisdiction. However, no CDFW jurisdiction is present within Addendum Offsite Project. Therefore, the addition of the Addendum Offsite Project to the proposed Project will not increase impacts to CDFW jurisdiction analyzed by the 2025 BTR.

5.8.4 Impacts to MSHCP Riparian/Riverine Areas

The 227.89-acre Project analyzed by the 2025 BTR would impact Riparian/Riverine areas. A DBESP addressing such impacts was approved by the RCA and received final approval by the Wildlife Agencies on September 12, 2024. No MSHCP Riparian/Riverine resources are present within Addendum Offsite Project. Therefore, the addition of the Addendum Offsite Project to the proposed Project will not increase impacts to Riparian/Riverine areas analyzed by the 2025 BTR and the approved DBESP remains valid.

5.9 Indirect Impacts to Biological Resources

In the context of biological resources, indirect effects are those effects associated with developing areas adjacent to adjacent native open space. Potential indirect effects associated with development include water quality impacts associated with drainage into adjacent open space/downstream aquatic resources; lighting effects; noise effects; invasive plant species from landscaping; and effects from human access into adjacent open space, such as recreational activities (including off-road vehicles and hiking), pets, dumping, etc. Temporary, indirect effects may also occur as a result of construction-related activities.

The overall Project will conserve lands in the northern part of the site that will contribute to the MSHCP Reserve and the Project will implement measures pursuant to the MSHCP Urban/Wildlands Interface Guidelines (*Volume I, Section 6.1.4* of the MSHCP), as discussed in the 2025 BTR. However, the 0.13-acre Addendum Offsite Project is not adjacent to the MSHCP Conservation Area, and therefore, the Urban/Wildlands Interface Guidelines do not apply to the Addendum Offsite Project.

5.10 Cumulative Impacts to Biological Resources

Cumulative impacts are defined as the direct and indirect effects of a proposed project which, when considered alone, would not be deemed a substantial impact, but when considered in addition to the impacts of related projects in the area, would be considered potentially

significant. “Related projects” refers to past, present, and reasonably foreseeable probable future projects which would have similar impacts as the proposed project.

The 2025 BTR concluded that the overall Project is not expected to result in cumulative impacts that would rise to a level of significance under CEQA. The addition of the Addendum Offsite Project will not itself cause or contribute to cumulatively significant impacts.

6.0 MITIGATION/AVOIDANCE MEASURES

The following project-specific mitigation/avoidance measures for actual or potential impacts to special-status resources were set forth by the 2025 BTR and are applicable to the Addendum Offsite Project. However, as no new significant impacts are identified for the 0.13-acre Addendum Offsite Project area, no new mitigation measures or revisions to the existing mitigation measures are needed.

6.1 Burrowing Owl

The onsite and offsite Project contains suitable habitat for burrowing owls; however, burrowing owls were not detected during focused surveys. MSHCP Objective 6 for burrowing owls requires that pre-construction surveys occur prior to site grading. As such, the following measure is recommended to avoid direct impacts to burrowing owls and to ensure consistency with the MSHCP.

- **Pre-Construction Survey.** A 30-day pre-construction survey for burrowing owls is required prior to future ground-disturbing activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the RCA and the Wildlife Agencies and will need to coordinate in the future with the RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure that burrowing owl have not colonized the site since it was last disturbed. If burrowing owls are found, the same coordination described above will be necessary.

6.2 Nesting Birds

The onsite and offsite Project contains vegetation with the potential to support native nesting birds. As discussed above, the California Fish and Game Code prohibits mortality of native birds, including eggs. The following measure is recommended to avoid take of nesting birds. Potential impacts to native birds was not considered a biologically significant impact under CEQA; however, to comply with state law, the following is recommended:

- As feasible, vegetation clearing should be conducted outside of the nesting season, which is generally identified as February 1 through August 31. If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior to any disturbance of the site, including disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.

6.3 Jurisdictional Waters

The 227.89-acre Project will impact a total of 0.36 acre of Regional Board Waters of the State and 0.44 acre of CDFW jurisdiction. There are no impacts to Corps jurisdiction within the Project Area as no Corps jurisdiction is present. The addition of the 0.13-acre Addendum Offsite Project to the overall Project will not increase impacts to jurisdictional waters as no such waters are present in the Addendum area.

The following measure identifies mitigation proposed for impacts to jurisdictional waters.

- Impacts to 0.44 acres of CDFW jurisdiction will be mitigated at 3:1 at Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by CDFW.

- Impacts to 0.36 acre of Regional Board impacts will be mitigated at 3:1 at Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the Regional Board.

6.4 MSHCP Riparian/Riverine Impacts

The 227.89-acre Project will impact 0.44 acre of MSHCP riparian/riverine resources within the Project (0.39 acre riverine and 0.05 acre riparian). The following measures will address these impacts. A DBESP that analyzes proposed impacts to riparian/riverine resources by the Project was approved by the RCA and Wildlife Agencies, with approval occurring on September 12, 2024. The addition of the 0.13-acre Addendum Offsite Project to the overall Project will not increase MSHCP riparian/riverine impacts as no such areas are present in the Addendum Offsite Project. The riparian/riverine features proposed for impact will be compensated at a minimum 3:1 ratio.

Compensatory mitigation for the loss of riparian/riverine resources will include the following:

- Impacts to 0.44 acres of MSHCP riparian/riverine areas will be mitigated at 3:1 at Riverpark Mitigation Bank or other mitigation bank, in-lieu program, or mitigation site as approved by the RCA and Wildlife Agencies.

7.0 MSHCP CONSISTENCY ANALYSIS

The RCA and Wildlife Agencies found the Project to be consistent with MSHCP requirements as reflected in the findings of JPR 09-12-14-01, dated February 25, 2010, and amended July 12, 2024. The addition of the 0.13-acre Addendum Offsite Project area to the overall Project analyzed by the 2025 BTR would not affect the findings of the approved JPR, and the MSHCP Consistency Analysis as presented in the 2025 BTR is unchanged with regard to the Project's consistency with MSHCP Reserve Assembly requirements, *Section 6.1.2* (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), *Section 6.1.3* (Protection of Narrow Endemic Plant Species), *Section 6.1.4* (Guidelines Pertaining to the Urban/Wildlands Interface), and *Section 6.3.2* (Additional Survey Needs and Procedures).

7.1 Project Relationship to Reserve Assembly

The onsite and offsite Project development footprint, including the Addendum area, is in the MSHCP Criteria Area. The Project is conserving 61.4 acres of land within the northern portion of the onsite Project consistent with MSHCP Reserve Assembly Requirements, as acknowledged through the findings of JPR 09-12-14-01. The 0.13-acre Addendum Offsite Project area is not applicable to Reserve Assembly.

7.2 Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools

A DBESP analyzing impacts to approximately 0.39 acre of riverine and 0.05 acre of riparian areas (a total of 0.44 acre) within the 227.89-acre Project was approved by the RCA and received final approval by the Wildlife Agencies on September 12, 2024.

The 0.13-acre Addendum Offsite Project area does not contain any MSHCP Riparian/Riverine areas or vernal pools or other features that could support fairy shrimp. Therefore, the approved DBESP addresses all impacts to riparian/riverine areas and vernal pools associated with the overall Project.

7.3 Protection of Narrow Endemic Plants

The 0.13-acre Addendum Offsite Project is not in the NEPSSA and no focused surveys for NEPSSA species are necessary. The Project is consistent with *Volume I, Section 6.1.3* of the MSHCP.

7.4 Guidelines Pertaining to the Urban/Wildland Interface

The overall Project will conserve lands in the northern part of the Project site that will contribute to assembly of the MSHCP Reserve and the Project will implement measures along the northern boundary of the development footprint pursuant to the MSHCP Urban/Wildlands Interface Guidelines (*Volume I, Section 6.1.4* of the MSHCP), as discussed in the 2025 BTR. However, the 0.13-acre Addendum Offsite Project is not adjacent to the MSHCP Conservation Area, and therefore, the Urban/Wildlands Interface Guidelines do not apply to the Addendum Offsite Project.

7.5 Additional Survey Needs and Procedures

As discussed in the 2025 BTR, focused burrowing owl surveys were conducted for the 227.89-acre onsite and offsite Project and no burrowing owl was detected, including in the 500-foot visual survey area; the Addendum Offsite Project is within the 500-foot visual survey area. The Addendum Offsite Project is not within the CAPSSA survey area and therefore focused plant surveys are not required. The Addendum Offsite Project does not occur within invertebrate, amphibian, and/or mammal survey areas; therefore, no invertebrate (Delhi Sands flower-loving fly), amphibian and/or mammal surveys are required.

As noted above, MSHCP Objective 6 for burrowing owls requires that pre-construction surveys within 30 days prior to site grading be completed. As such, the following measure is recommended to avoid direct impacts to burrowing owls and to ensure consistency with the MSHCP:

A qualified biologist will conduct a pre-construction survey for burrowing owls within 30 days of initial ground-disturbing activities (e.g. vegetation clearing, clearing and grubbing, tree removal, site watering) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the Project proponent will immediately inform the Wildlife Agencies and the RCA and will need to coordinate further with RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrow owl is found, the same coordination described above will be necessary.

7.6 Conclusion of MSHCP Consistency

As discussed above, the RCA and Wildlife Agencies found the Project to be consistent with MSHCP requirements as reflected in the findings of JPR 09-12-14-01, dated February 25, 2010, and amended July 12, 2024. The addition of the 0.13-acre Addendum Offsite Project to the 227.89-acre Project analyzed in the 2025 BTR does not change the determination of the approved JPR. The overall 228.02-acre Project (which includes the 227.89-acre Project and the 0.13-acre Addendum Offsite Project), is consistent with the biological requirements of the MSHCP, specifically pertaining to the onsite and offsite Project's relationship to reserve assembly, *Section 6.1.2* (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), *Section 6.1.3* (Protection of Narrow Endemic Plant Species), *Section 6.1.4* (Guidelines Pertaining to the Urban/Wildlands Interface), and *Section 6.3.2* (Additional Survey Needs and Procedures).

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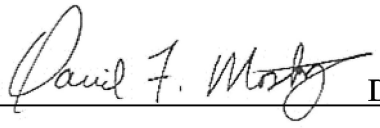
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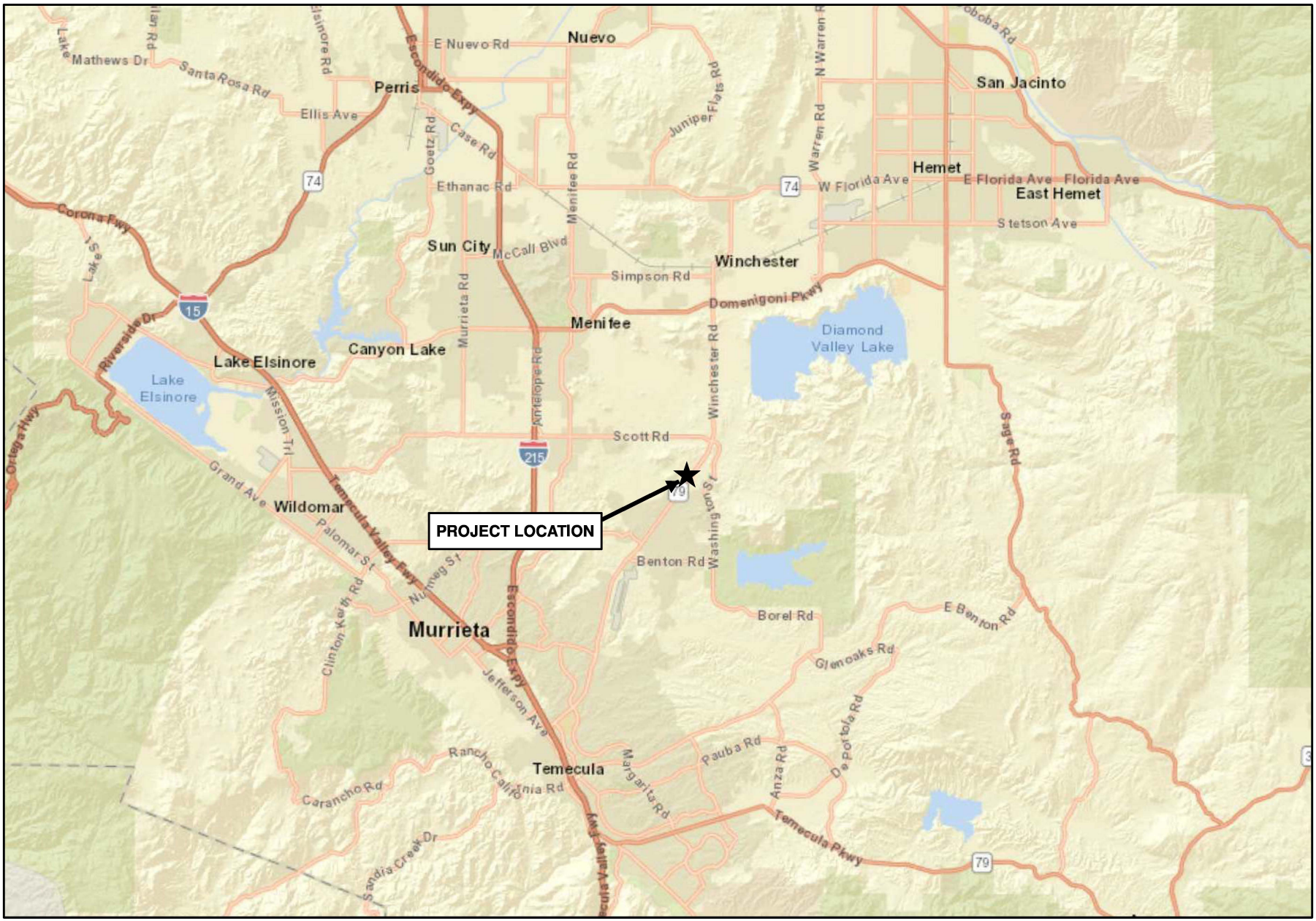
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9.0 CERTIFICATION

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

Signed:  Date: March 19, 2026

p:0446-162a.btr addendum



Source: ESRI World Street Map

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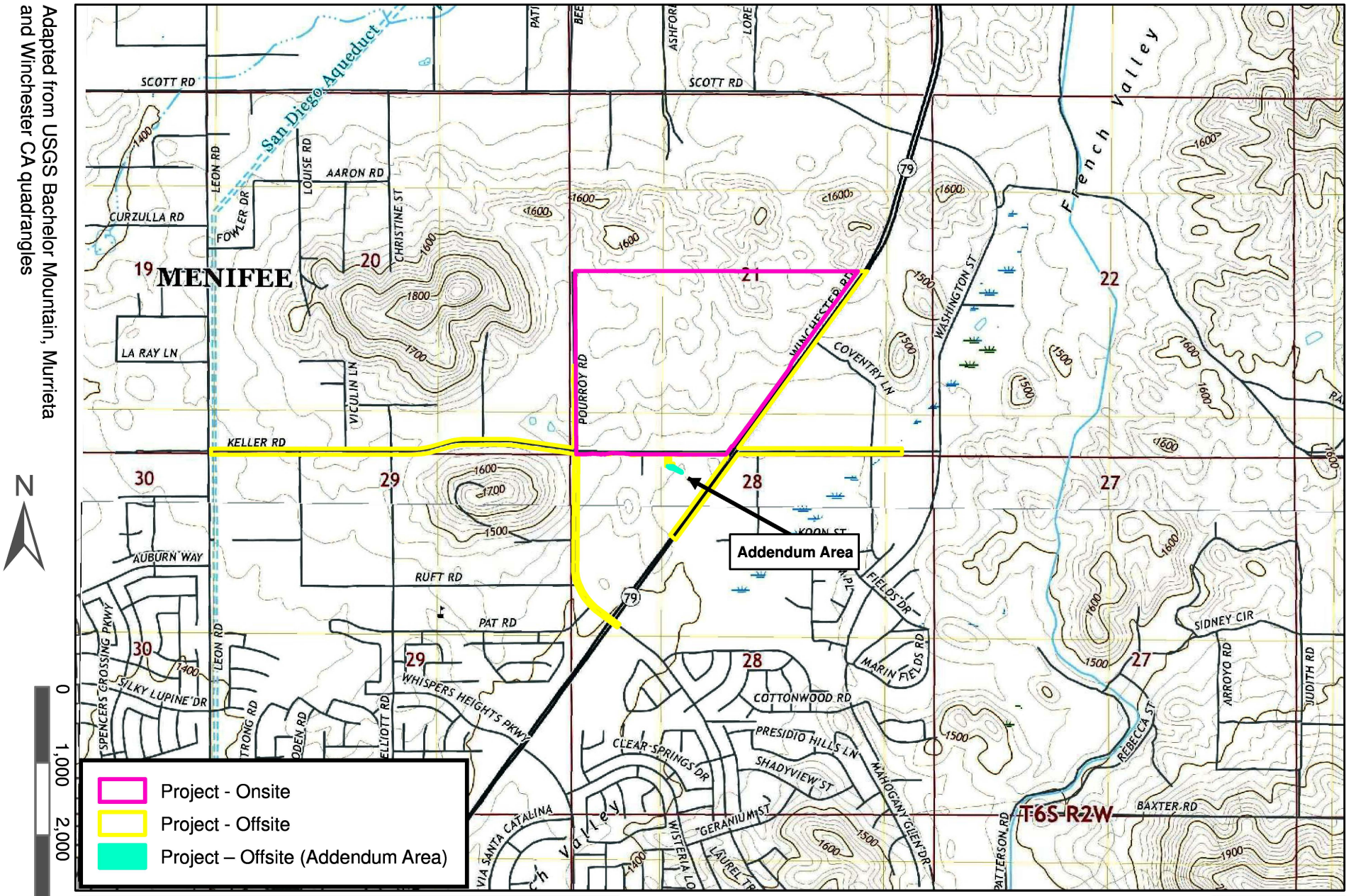
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KELLER CROSSING PROJECT

Regional Map

GLENN LUKOS ASSOCIATES

Exhibit 1

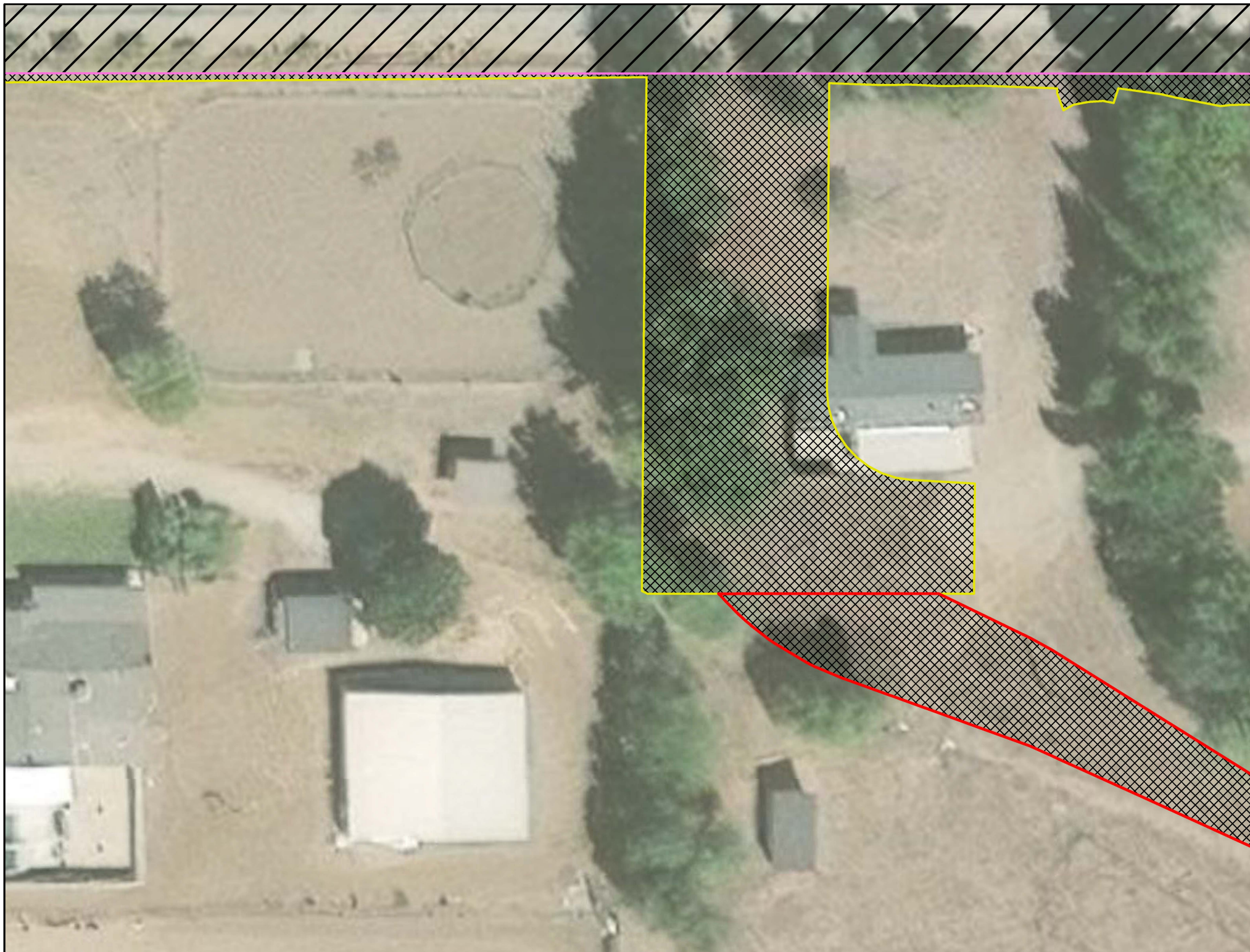


KELLER CROSSING PROJECT

Vicinity Map

GLENN LUKOS ASSOCIATES

Exhibit 2




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