

April 4, 2022

JN 188508

RODEO CREDIT ENTERPRISES, LLC

Attn: Ms. Kris Pinero

9595 Wilshire Boulevard, Suite 708

Beverly Hills, CA 90212

SUBJECT: Results of a Biological Resources Assessment for the Proposed Tentative Tract Map 83590 Project – City of Lancaster, County of Los Angeles, California

Dear Ms. Pinero:

Michael Baker International (Michael Baker) has prepared this report to document the results of a biological resources assessment for the proposed Tentative Tract Map 83590 Project (project or project site) located in the City of Lancaster, County of Los Angeles, California. Michael Baker conducted a thorough literature review and a field survey to confirm existing site conditions and assess the potential for special-status plant and wildlife species¹ that have been documented or that are likely to occur on or within the immediate vicinity of the project site. Specifically, this report provides a detailed assessment of the suitability of the on-site habitat to support special-status plant and wildlife species that were identified in the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database RareFind 5 (CNDDDB; CDFW 2022a), the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California (CIRP; CNPS 2022), the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation Project Planning Tool (IPaC; USFWS 2022a), and other databases as potentially occurring in the vicinity of the project site.

Project Location

The project site is generally located north of Avenue J, east of 30th Street East, south of East Lancaster Boulevard, and west of 40th Street East in the City of Lancaster, County of Los Angeles, California (refer to Figure 1, *Regional and Project Vicinity*). The project site is depicted in Section 17 of Township 7 North, Range 11 West, on the U.S. Geological Survey's (USGS) *Lancaster East, California* 7.5-minute

¹ As used in this report, "special-status" refers to plant and wildlife species that are federally-/State-listed, proposed, or candidates; plant species that have been designated a California Rare Plant Rank species by the California Native Plant Society; wildlife species that are designated by the California Department of Fish and Wildlife as Fully Protected, Species of Special Concern, or Watch List species; State/locally rare vegetation communities; and species that warrant protection under local or regional preservation policies.

quadrangle. Specifically, the project site totals approximately 28.41 acres and encompasses Assessor's Parcel Numbers (APN) 3150-028-001 and 3150-028-002 (refer to Figure 2, *Project Site*).

Methodology

Literature Review

Michael Baker conducted thorough literature reviews and records searches to determine which special-status biological resources have the potential to occur on or within the general vicinity of the project site. Previous special-status plant and wildlife species occurrence records within the USGS *Lancaster East, California* 7.5-minute quadrangle was determined through a query of the CNDDDB (CDFW 2022a) and CIRP (CNPS 2022), and for the project region through a review of the IPaC (USFWS 2022a).

The current regulatory/conservation status of special-status plant and wildlife species was verified through lists and resources provided by the CDFW, specifically the *Special Animals List* (CDFW 2022b), *Special Vascular Plants, Bryophytes, and Lichens List* (CDFW 2022c), *State and Federally Listed Endangered and Threatened Animals of California* (CDFW 2022d), and *State and Federally Listed Endangered, Threatened, and Rare Plants of California* (CDFW 2022e). USFWS-designated Critical Habitat for species listed under federal Endangered Species Act (FESA) was reviewed online via the Environmental Conservation Online System: Threatened and Endangered Species Active Critical Habitat Report (USFWS 2022b). In addition, Michael Baker reviewed previously prepared reports, survey results, and literature, as available, detailing the biological resources previously observed on or within the vicinity of the project site to understand existing site conditions, confirm previous species observations, and note the extent of any disturbances, if present, that have occurred within the project site that would otherwise limit the distribution of special-status biological resources. Standard field guides and texts were reviewed for specific habitat requirements of special-status species, as well as the following resources:

- Calflora Database (Calflora 2022)
- Google Earth Pro Historical Aerial Imagery from 1985 to 2022 (Google Inc. 2022)
- *City of Lancaster General Plan 2030* (City of Lancaster 2009)
- Species Accounts provided by Birds of the World (Billerman et. al 2020)
- Cornell Lab of Ornithology's eBird Database (eBird 2022)
- *Custom Soil Resource Report for Antelope Valley Area, California* (U.S. Department of Agriculture [USDA] 2022)
- National Wetlands Inventory Mapper (USFWS 2022c)

Biological Field Survey/Habitat Assessment

Michael Baker biologists Tom Millington and Frances Yau conducted a biological field survey/habitat assessment on March 9, 2022, to document existing conditions and assess the potential for special-status biological resources to occur within the boundaries of the project site. Michael Baker biologists were able

to survey the entire project site and encountered no limitations or access restrictions. Refer to Table 1 below for a summary of the survey date, timing, surveyors, and weather conditions.

Table 1: Survey Date, Time, Surveyors, and Weather Conditions

Date	Time (start / finish)	Surveyors	Weather Conditions (start / finish)	
			Temperature (°F)	Wind Speed (mph)
March 9, 2022	0800 / 0930	Tom Millington, Frances Yau	51 sunny / 60 sunny	3 / 4

Vegetation communities occurring within the project site were mapped on an aerial photograph and classified in accordance with the vegetation descriptions provided in *A Manual of California Vegetation* (Sawyer et al. 2009) and cross referenced with the *California Sensitive Natural Communities List* (CDFW 2021) and the *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986) for the purposes of evaluating the presence or absence of special-status vegetation communities identified in the CNDDDB records search, which uses the Holland vegetation classification system. In addition, site characteristics such as soil condition, topography, hydrology, anthropogenic disturbances, indicator species, condition of on-site vegetation communities, and the presence of potentially regulated jurisdictional features (e.g., streams, flood control channels) were noted within the project site. Michael Baker used Geographic Information Systems (GIS) ArcView software to digitize the mapped vegetation communities and then transferred these data onto an aerial photograph to further document existing conditions and quantify the acreage of each vegetation community.

All plant and wildlife species observed/detected, as well as dominant plant species within each vegetation community, were recorded. Plant species observed during the field survey were identified by visual characteristics and morphology in the field, while unusual and less familiar plant species were photographed and identified later using taxonomic guides. Plant nomenclature used in this report follows the *Jepson Manual: Vascular Plants of California, Second Edition* (Baldwin et al. 2012) and scientific names are provided immediately following common names of plant species (first reference only).

Wildlife species were identified by sight, calls, tracks, scat, or other types of evidence. Field guides used to assist with identification of wildlife species during the habitat assessment included *The Sibley Guide to Birds* (Sibley 2014), *A Field Guide to Western Reptiles and Amphibians* (Stebbins 2003), *Bats of the United States and Canada* (Harvey et al. 2011), and *A Field Guide to Mammals of North America* (Reid 2006). Although common names of wildlife species are well standardized, scientific names are provided immediately following common names of wildlife species in this report (first reference only). To the extent possible, nomenclature of birds follows the most recent annual supplement of the American Ornithological Society's *Checklist of North American Birds* (Chesser et al. 2020), nomenclature of amphibians and reptiles follows *Scientific and Standard English Names of Amphibians and Reptiles of North America North of Mexico, with Comments Regarding Confidence in Our Understanding* (Crother 2017), and nomenclature for mammals follows the *Revised Checklist of North American Mammals North of Mexico* (Bradley et al. 2014).

Existing Site Conditions

The project site is flat with an approximate elevation of 2,393 feet above mean sea level. According to the *Custom Soil Resource Report for Antelope Valley Area, California, Southwestern Part* (USDA 2022), the project site is underlain by the following soil units: Cajon loamy sand, 0 to 2 percent slopes (CaA), Hesperia loamy fine sand, 0 to 2 percent slopes (HgA), and Rosamond loamy fine sand (Rm) (refer to Figure 3, *USDA Soils*). Based on a review of historic aerial imagery (Google, Inc. 2022) and results from the field survey, the project site has been comprised of an open undisturbed plot since at least 1985 with native desert scrub vegetation. Surface soils within the project site were mostly undisturbed; however, evidence of off-road vehicle disturbance was observed during the field survey along the eastern project boundary, starting from Avenue J north towards East Lancaster Boulevard. While there is no existing development directly adjacent to the project site, Avenue J fronts the project's southern boundary and various single-family residential developments and institutional uses are located within a one-mile radius of the site. Refer to Attachment B for representative photographs of the project site taken during the field survey.

Vegetation Communities and Land Cover Types

Rubber rabbitbrush scrub (*Ericameria nauseosa* Shrubland Alliance) is the only natural vegetation community that was observed and mapped within the entire 28.41-acre project site (refer to Figure 4, *Vegetation Communities and Other Land Uses*). This vegetation community is dominated by rubber rabbitbrush (*Ericameria nauseosus*) and is characterized by fairly evenly spaced shrubs, usually up to three feet tall. Additional plant species observed within this community included common fiddleneck (*Amsinckia intermedia*), fourwing saltbush (*Atriplex canescens*), Mormon tea (*Ephedra aspera*), prickly lettuce (*Lactuca serriola*), and cheeseweed (*Malva parviflora*). Although naturally occurring, rubber rabbitbrush scrub is often disturbed and prevalent along roadsides, heavily grazed areas, and along the borders of agricultural fields.

Wildlife

Natural vegetation communities provide foraging habitat, nesting/denning sites, and shelter from adverse weather or predation. This section provides a general discussion of common wildlife species that have been detected on-site by Michael Baker or that are expected to occur based on existing site conditions. The discussion is to be used as a general reference and is limited by the season, time of day, and weather conditions during the field survey.

Fish

No fish or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would support populations of fish were observed in the project site during the field survey. Therefore, no fish are expected to occur.

Amphibians

No amphibians or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable breeding habitat for amphibians were observed within the project site during the field survey. Therefore, no amphibians are expected to occur.

Reptiles

No reptile species were observed in the project site during the field survey. The project site is expected to provide habitat for a limited number of reptilian species that are acclimated to edge or urban environments. Common reptilian species that may be present within the project site include western fence lizard (*Sceloporus occidentalis*) and western side-blotched lizard (*Uta stansburiana elegans*).

Birds

A total of seven (7) bird species were detected during the field survey and included American crow (*Corvus brachyrhynchos*), raven (*Corvus corax*), white-crowned sparrow (*Zonotrichia leucophrys*), house finch (*Haemorrhous mexicanus*), northern mockingbird (*Mimus polyglottos*), western meadowlark (*Sturnella neglecta*), and California horned lark (*Eremophila alpestris actia*; a State Watch List [WL] species).

Nesting birds are protected pursuant to the federal Migratory Bird Treaty Act (MBTA) of 1918 and the California Fish and Game Code (CFGF)². To maintain compliance with the MBTA and CFGF, clearance surveys are typically required prior to any ground disturbance or vegetation removal activities to avoid direct or indirect impacts to active bird nests and/or nesting birds. Consequently, if an active bird nest is destroyed or if project activities result in indirect impacts (e.g., nest abandonment, loss of reproductive effort) to nesting birds, it is considered “take” and is potentially punishable by fines and/or imprisonment. Although the project site provides suitable nesting habitat for various year-round and seasonal bird species, no active nests or birds displaying overt nesting behavior were observed during the field survey.

Mammals

The project site provides marginal habitat for a limited number of mammalian species adapted to living in edge or urban environments. Black-tailed jackrabbit (*Lepus californicus*) and California ground squirrel (*Otospermophilus beecheyi*) were the only mammal species observed during the field survey. Other common mammalian species that may occur within the project site include opossum (*Didelphis virginiana*), racoon (*Procyon lotor*), and domestic dog (*Canis lupus familiaris*). Bats occur throughout most of

² Section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the California Fish and Game Code or any regulation made pursuant thereto; Section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey); and Section 3513 makes it unlawful to take or possess any migratory non-game bird except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act, as amended (16 U.S.C. § 703 *et seq.*).

California; however, no bats are expected to occur within the project site due to the absence of suitable foraging and/or roosting habitat (e.g., hollow tree trunks/limbs, tree foliage, caves, bridges, buildings).

Migratory Corridors and Linkages

Wildlife corridors and linkages are key features for wildlife movement between habitat patches. Wildlife corridors are generally defined as those areas that provide opportunities for individuals or local populations to conduct seasonal migrations, permanent dispersals, or daily commutes, while linkages generally refer to broader areas that provide movement opportunities for multiple keystone/focal species or allow for propagation of ecological processes (e.g., for movement of pollinators), often between areas of conserved land.

Although the project area is not fully developed and undisturbed open areas are located directly adjacent to the site's northern, eastern, and western boundaries. Wildlife movement into or out of the project site is likely reduced by the presence of surrounding roadways (i.e., Avenue J and 30th Street East) and existing residential and institutional developments to the south and east, which have fragmented the connection between the project site and surrounding naturally occurring vegetation communities. Elevated noise levels, vehicle roadway/traffic, lighting, and presence of humans and domestic pets are also expected to further decrease the suitability of the project site to be used as a wildlife movement corridor or linkage.

The project site is not located within any designated wildlife corridor or Significant Ecological Area (SEA) identified in the City of Lancaster General Plan 2030 or Los Angeles County General Plan (County of Los Angeles 2015). However, the Antelope Valley SEA is located approximately 2.5 miles east of the project site. The Antelope Valley SEA extends from the Angeles National Forest to the playa lakes within Edwards Air Force Base, encompassing the two largest drainages exiting the northern slope of the San Gabriel Mountain range. The geographical features of these drainages serve as major habitat linkages and movement corridors for all wildlife species within the vicinity. Thus, wildlife species are more likely to utilize the Antelope Valley SEA as a wildlife corridor or linkage to other natural habitats than the project area.

State and Federal Jurisdictional Resources

There are three agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The U.S. Army Corps of Engineers (USACE) Regulatory Branch regulates discharge of dredged or fill material into "waters of the U.S." pursuant to Section 404 of the federal Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the Regional Water Quality Control Board (RWQCB) regulates discharges to surface waters pursuant to Section 401 of the CWA and Section 13263 of the California Porter-Cologne Water Quality Control Act, and the CDFW regulates alterations to streambed and associated vegetation communities under Section 1600 *et seq.* of the CFGC.

No jurisdictional drainage or potential wetland features were observed within the boundaries of the project site. Therefore, development of the proposed project is not expected to result in impacts to State or federal jurisdictional areas or require regulatory approvals/permits from the USACE, RWQCB, or CDFW.

Special-Status Biological Resources

The CNDDDB (CDFW 2022a), CIRP (CNPS 2022), and IPaC (USFWS 2022a) were queried for reported locations of special-status plant and wildlife species as well as special-status natural vegetation communities in the USGS *Lancaster East, California* 7.5-minute quadrangle. The biological field survey/habitat assessment was conducted to assess and evaluate the conditions of the habitat(s) within the boundaries of the project site to determine if the existing vegetation communities, at the time of the field survey, have the potential to provide suitable habitat(s) for special-status plant and wildlife species. Additionally, the potentials for special-status species to occur within the project site were determined based on the reported occurrence locations in the CNDDDB, CIRP, and Calflora databases and the following criteria:

- **Present:** the species was observed or detected within the project site during the field survey.
- **High:** Recent (within 20 years) occurrence records indicate that the species has been known to occur on or within 1 mile of the project site and the site is within the normal expected range of this species. Intact, suitable habitat preferred by this species occurs within the project site and/or there is viable landscape connectivity to a local known extant population(s) or sighting(s).
- **Moderate:** Recent (within 20 years) occurrence records indicate that the species has been known to occur within 1 mile of the project site and the project site is within the normal expected range of this species. There is suitable habitat within the project site, but the site is ecologically isolated from any local known extant populations or sightings.
- **Low:** Recent (within 20 years) occurrence records indicate that the species has been known to occur within 5 miles of the project site, but the site is outside of the normal expected range of the species and/or there is poor quality or marginal habitat within the project site.
- **Not Expected:** There are no occurrence records of the species occurring within 5 miles of the project site, there is no suitable habitat within the project site, and/or the project site is outside of the normal expected range for the species.

Eight (8) special-status plant species and fourteen (14) special-status wildlife species were identified during the review of the CNDDDB and CIRP as occurring within the USGS *Lancaster East, California* 7.5-minute quadrangle and in the IPaC for the project region. No special-status vegetation communities were identified. Special-status plant and wildlife species were evaluated for their potential to occur within the project site based on specific habitat requirements, availability/quality of suitable habitat, and known distributions of

species/populations. Special-status biological resources identified during the literature review are presented in *Table C-1: Potentially Occurring Special-Status Biological Resources*, provided in Attachment C.

Special-Status Plants

A total of eight (8) special-status plant species have been recorded in the USGS *Lancaster East, California* 7.5-minute quadrangle by the CNDDDB and CIRP (refer to Attachment C). There were no special status plants identified in the project site during the field survey. Based on the results of the field survey and a review of specific habitat preferences, distributions, and elevation ranges, Michael Baker determined that none of the special-status plant species identified by the CNDDDB, CIRP, and IPaC are expected to occur within the project site.

Special-Status Wildlife

A total of fourteen (14) special-status wildlife species have been recorded in the USGS *Lancaster East, California* 7.5-minute quadrangle by the CNDDDB and project region by the IPaC (refer to Attachment C). California horned lark (a State WL species) was the only special-status wildlife species observed during the field survey and could potentially nest within the project site. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, Michael Baker determined that the project site also has a moderate potential to support burrowing owl (*Athene cunicularia*; a State Species of Special Concern) and a low potential to support Cooper's hawk (*Accipiter cooperii*; a State WL species) and ferruginous hawk (*Buteo regalis*; a State WL species). Cooper's hawks are not expected to nest within the project site or immediate vicinity due to a lack of deciduous trees and/or habitats preferred by this species. Ferruginous hawks do not nest in California and would only be present during the winter. However, since there is suitable prey and perch spots (i.e., telephone and light poles), the project site could still be used as foraging habitat for both of these species. All remaining special-status wildlife species identified by the CNDDDB and IPaC are not expected to occur within the project site.

Due to its regional significance in the project area, burrowing owl and Mohave ground squirrel (*Xerospermophilus mohavensis*; a State Threatened species) are described in further detail below.

Burrowing Owl

The burrowing owl is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with well-drained, level to gently-sloping areas characterized by sparse vegetation and bare ground (Haug and Didiuk 1993; Dechant *et al.* 1999). Burrowing owls are dependent upon the presence of burrowing mammals (e.g., California ground squirrels, coyotes, American badger [*Taxidea taxus*]) whose burrows are used for roosting and nesting. The presence or absence of mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-

made cavities, such as buried and non-functioning drain pipes, stand-pipes, and dry culverts. Burrowing owls may also burrow beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing open line-of-sight of the surrounding habitat to forage as well as watch for predators.

According to the CNDDB, there are eight (8) occurrence records for burrowing owl within the USGS *Lancaster East, California* 7.5-minute quadrangle. The closest extant occurrence (Occurrence Number 709) was recorded in 2004, approximately 1,193 feet southeast of the project site; as many as eight (8) owls were observed near burrows (CDFW 2022a). Additionally, another occurrence (Occurrence Number 964) was recorded in 2005, approximately 1,280 feet to the north of the project site; at least one (1) owl was observed near an active burrow (CDFW 2022a). In addition, there are several records of this species in the eBird database, within and just outside of a 5-mile radius from the project site (eBird 2022).

The project site is located near existing residential and institutional developments, with Avenue J immediately to the south of the site. In addition, there are several utility poles along Avenue J, 30th Street East, and other nearby roadways that could provide perching opportunities for predatory raptors. However, the on-site rubber rabbitbrush scrub is relatively open and provides suitable foraging habitat for burrowing owl. Further, California ground squirrels were observed in the western portion of project site during the field survey and could provide suitable burrows for nesting burrowing owls, if present. As a result, the project site was determined to have moderate potential to support burrowing owl.

Mohave Ground Squirrel

The Mohave ground squirrel (MGS), a State Threatened species, is a small day-active rodent endemic to the western Mojave Desert of California in San Bernardino, Los Angeles, Kern, and Inyo counties. It has one of the smallest geographic ranges of any North American ground squirrel and spends much of the year in underground burrows to avoid the harsh conditions of its desert environment. Optimal habitats are open desert scrub, alkali desert scrub, Joshua tree, and annual grasslands. MGS feed on a wide variety of green vegetation, seeds, and fruits and forages on the ground or in shrubs and Joshua trees. This species prefers sandy to gravelly soils and avoids rocky areas. Populations are reduced by urban development, off-road vehicle use, and agriculture.

According to the CNDDB, there are two (2) occurrence records for MGS within the USGS *Lancaster East, California* 7.5-minute quadrangle. However, both occurrence records (Occurrence Number 26 and 271) were recorded more than 20 years ago in 1984 and 1973, respectively. The project site is located near the southwestern-most edge of the MGS geographic range, but it is not within any area containing a core or peripheral MGS population (CDFW 2019). Due to the lack of occurrence records within the vicinity and distance from existing populations, MGS is not expected to occur on-site.

Critical Habitat

Under the definition included in the FESA, designated Critical Habitat refers to specific areas within the geographical range of a species that were occupied at the time it was listed that contain the physical or biological features that are essential to the survival and eventual recovery of that species. Areas of Critical Habitat may require special management considerations or protection, regardless of whether the species is still extant in the area. Areas that were not known to be occupied at the time a species was listed can also be designated Critical Habitat if they contain one or more of the physical or biological features that are essential to that species' conservation and if the other areas that are occupied are inadequate to ensure the species' recovery. If a project may result in take or adverse modification to a species' designated Critical Habitat and the project has a federal nexus, the project proponent may be required to provide suitable mitigation. Projects with a federal nexus may include projects that occur on federal lands, require federal permits (e.g., CWA Section 404 permit), or receive any federal oversight or funding. If there is a federal nexus, then the federal agency that is responsible for providing funds or permits would be required to consult with the USFWS pursuant to the FESA.

The project site is not located within USFWS-designated Critical Habitat for any federally listed species (refer to Figure 5, *Critical Habitat*).

Local Policies and Ordinances

City of Lancaster Municipal Code

Lancaster Municipal Code (Municipal Code) Chapter 15.66, *Biological Impact Fee*, establishes a biological impact fee to mitigate long-term incremental impacts of new development on biological resources on a regional basis. The fee is based upon expected regional effects from new development and fees necessary to contribute to the City's "fair share" to mitigate impacts on a regional basis. The fee applies to all new development on vacant land which has not been previously developed. This includes land subdivisions, new development approvals, and requests for extension.

Additionally, Municipal Code Chapter 22.102, *Hillside Management and Significant Ecological Areas*, establishes development guidelines and required permits for development in or near SEAs.

The proposed project would be subject to the biological impact fee established in Municipal Code Chapter 15.66; however, as the site is not located in or near an SEA, Municipal Code Chapter 22.102 would not apply to the project.

Conclusions and Recommendations

Approximately 28.41 acres of rubber rabbitbrush scrub was observed and mapped within the boundaries of the project site during the field survey.

No special-status plant species were observed within the project site during the field survey. Based on the results of the field survey and a review of specific habitat preferences, distributions, and elevation ranges, Michael Baker determined that none of the special-status plant species identified by the CNDDDB, CIRP, and IPaC are expected to occur within the project site.

California horned lark (a State WL species) was the only special-status wildlife species observed during the field survey and could potentially nest within the project site. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, Michael Baker determined that the project site also has a moderate potential to support burrowing owl (a State Species of Special Concern) and a low potential to support Cooper's hawk (a State WL species) and ferruginous hawk (a State WL species). While the project site is located near existing residential and institutional developments and several utility poles are located along nearby roadways that could provide perching opportunities for predatory raptors, the on-site rubber rabbitbrush scrub is relatively open and provides suitable foraging habitat for burrowing owl. Further, California ground squirrels were observed in the western portion of project site during the field survey and could provide suitable burrows for nesting burrowing owls, if present. Cooper's hawks are not expected to nest within the project site or immediate vicinity due to a lack of deciduous trees and/or habitats. Also, ferruginous hawks do not nest in California and would only be present during the winter. However, since there is suitable prey and perch spots (i.e., telephone and light poles), the project site could still be used as foraging habitat for both of these species. All remaining special-status wildlife species identified by the CNDDDB and IPaC are not expected to occur within the project site.

In order to avoid and/or minimize potential impacts to biological resources, it is recommended that the following Avoidance and Minimization Measures (AMM) be implemented:

AMM BIO-1: If project-related activities are to be initiated during the nesting season (January 1 to August 31), a pre-construction nesting bird clearance survey shall be conducted by a qualified biologist no more than three (3) days prior to the start of any vegetation removal or ground disturbing activities. The qualified biologist shall survey all suitable nesting habitat within the project impact area, and areas within a biologically defensible buffer zone surrounding the project impact area. If no active bird nests are detected during the clearance survey, project activities may begin, and no additional avoidance and minimization measures shall be required. If an active bird nest is found, the species shall be identified, and a "no-disturbance" buffer shall be established around the active nest. The size of the "no-disturbance" buffer shall be increased or decreased based on the judgement of the qualified biologist and level of activity and sensitivity of the species. The qualified biologist shall periodically monitor any active bird nests to determine if project-related activities occurring outside the "no-disturbance" buffer disturb the birds and if the buffer shall be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the "no-disturbance" buffer may

occur following an additional survey by the qualified biologist to search for any new bird nests in the restricted area.

AMM BIO-2: A pre-construction burrowing owl clearance survey shall be conducted no more than 30 days prior to any vegetation removal or ground disturbing activities to avoid impacts to burrowing owls and/or occupied burrows. The pre-construction clearance survey shall be conducted by a qualified biologist and in accordance with the methods outlined in the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game 2012). Documentation of surveys and findings shall be submitted to the City of Lancaster for review and file. If no burrowing owls or occupied burrows are detected, project activities may begin, and no additional avoidance and minimization measures shall be required.

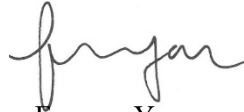
If an occupied burrow is found outside, but within 500 feet, of the development footprint, the qualified biologist shall establish a “no-disturbance” buffer around the burrow location(s). The size of the “no-disturbance” buffer shall be determined in consultation with CDFW and be based on the species status (i.e., breeding, non-breeding) and proposed level of disturbance. If an occupied burrow is found within the development footprint and cannot be avoided, a burrowing owl exclusion and mitigation plan shall be prepared and submitted to CDFW for approval prior to initiating project activities.

Please do not hesitate to contact me at (949) 246-7004 or tommillington@mbakerintl.com or Frances Yau at (949) 330-4105 or frances.yau@mbakerintl.com should you have any questions or require further information.

Sincerely,



Tom Millington
Senior Biologist



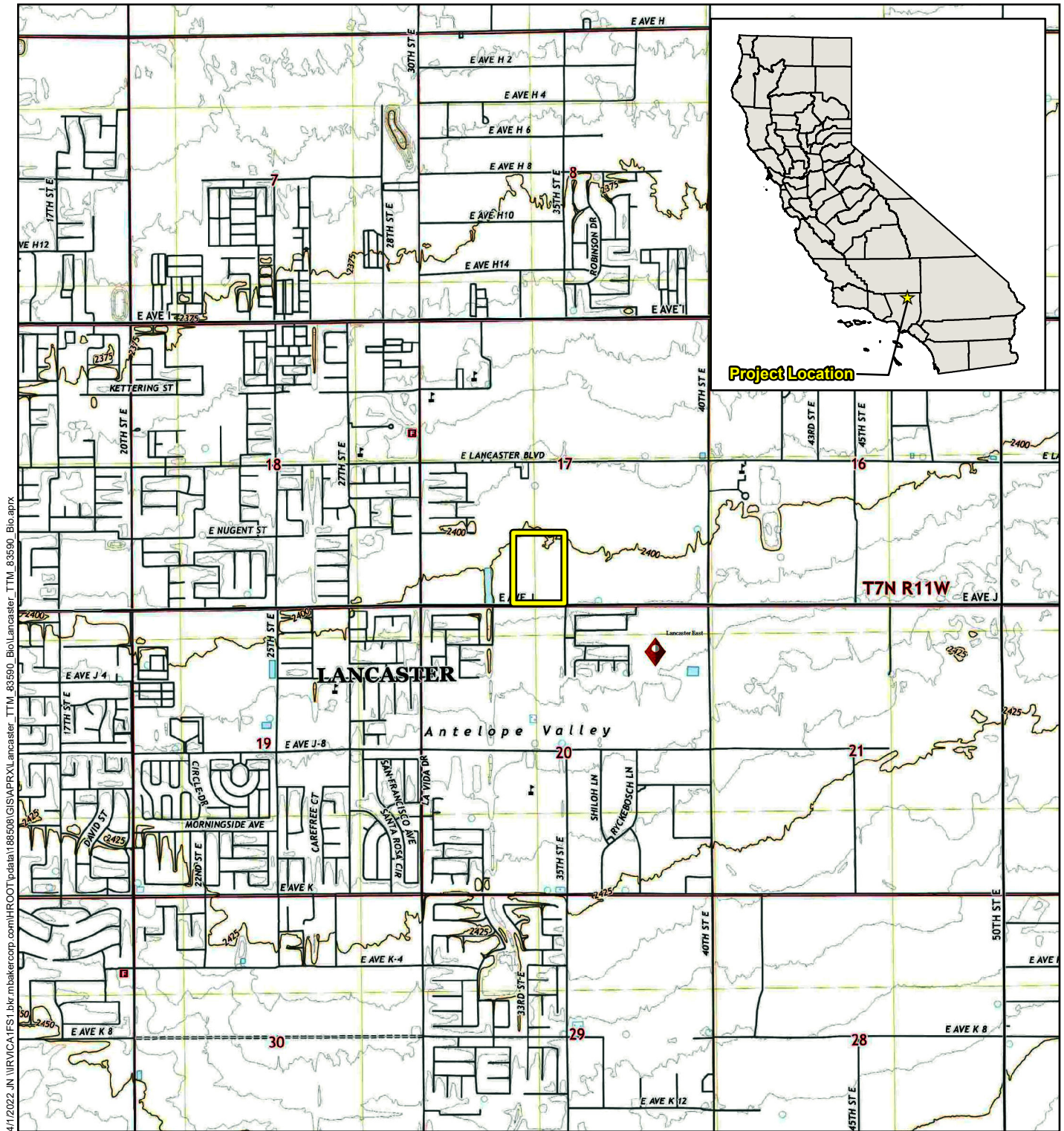
Frances Yau
Biologist

Attachments:

- A. *Project Figures*
- B. *Site Photographs*
- C. *Potentially Occurring Special-Status Biological Resources*
- D. *References*

Attachment A

Project Figures



4/12/2022 JN \\IRVICA\FS1\BIR\mbacker\corp\HROOT\pdata\185508\GIS\APRXL\lancaster_TTM_83590_Bio.aprx

34.693776
-118.067507



34.689809
-118.071846



Avenue J

35th St E

Legend



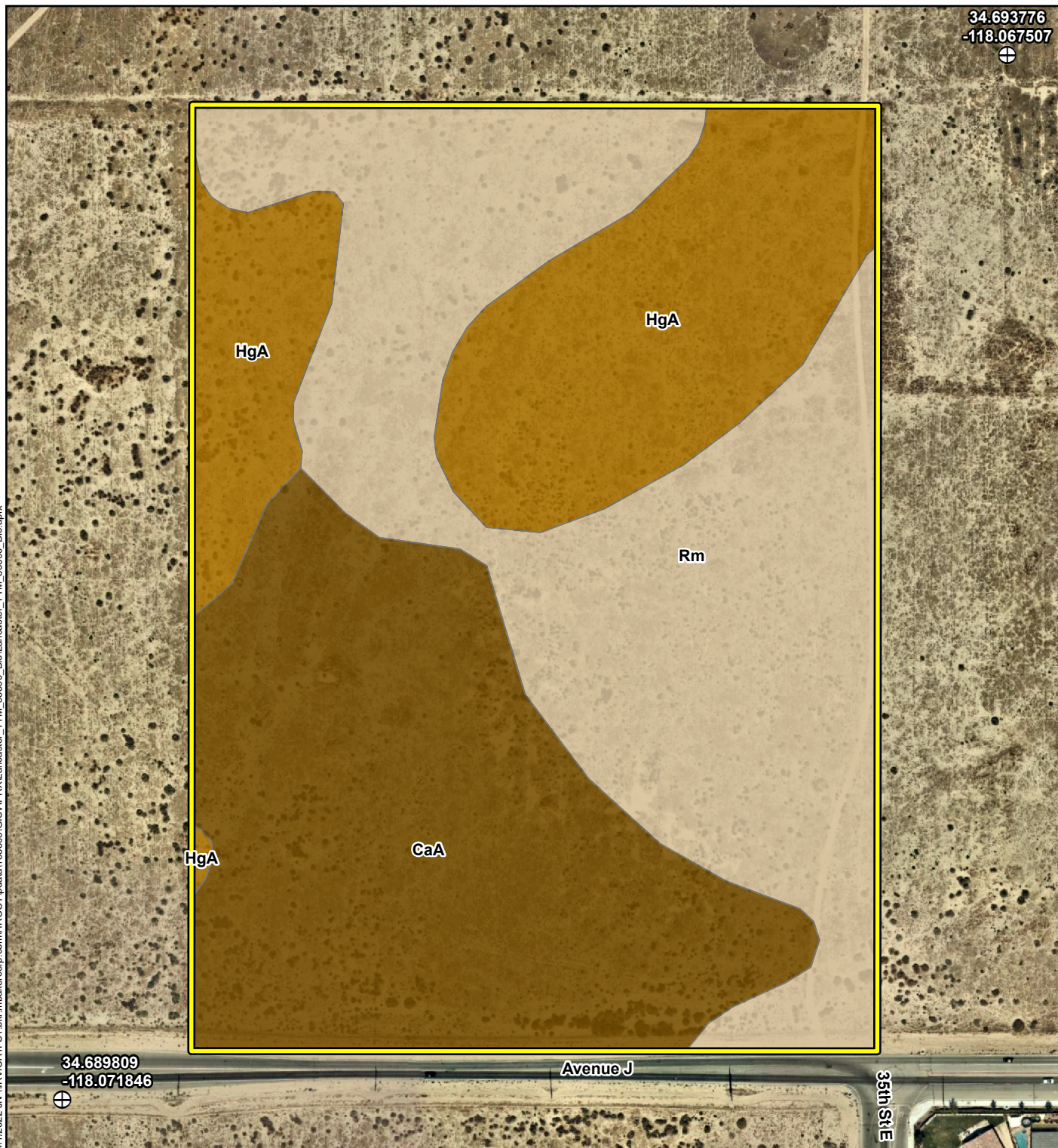
Project Site



Reference Point



4/12/2022 JN \\IRVICA\FS1\Bkr.mbakercorp.com\HROOT\pdata\185508\GIS\APRXLancaster_TTM_83590_Bio.aprx



Legend



Project Site



Reference Point



CaA Cajon loamy sand,
0 to 2 percent slopes



HgA Hesperia loamy fine sand,
0 to 2 percent slopes



Rm Rosamond loamy fine sand



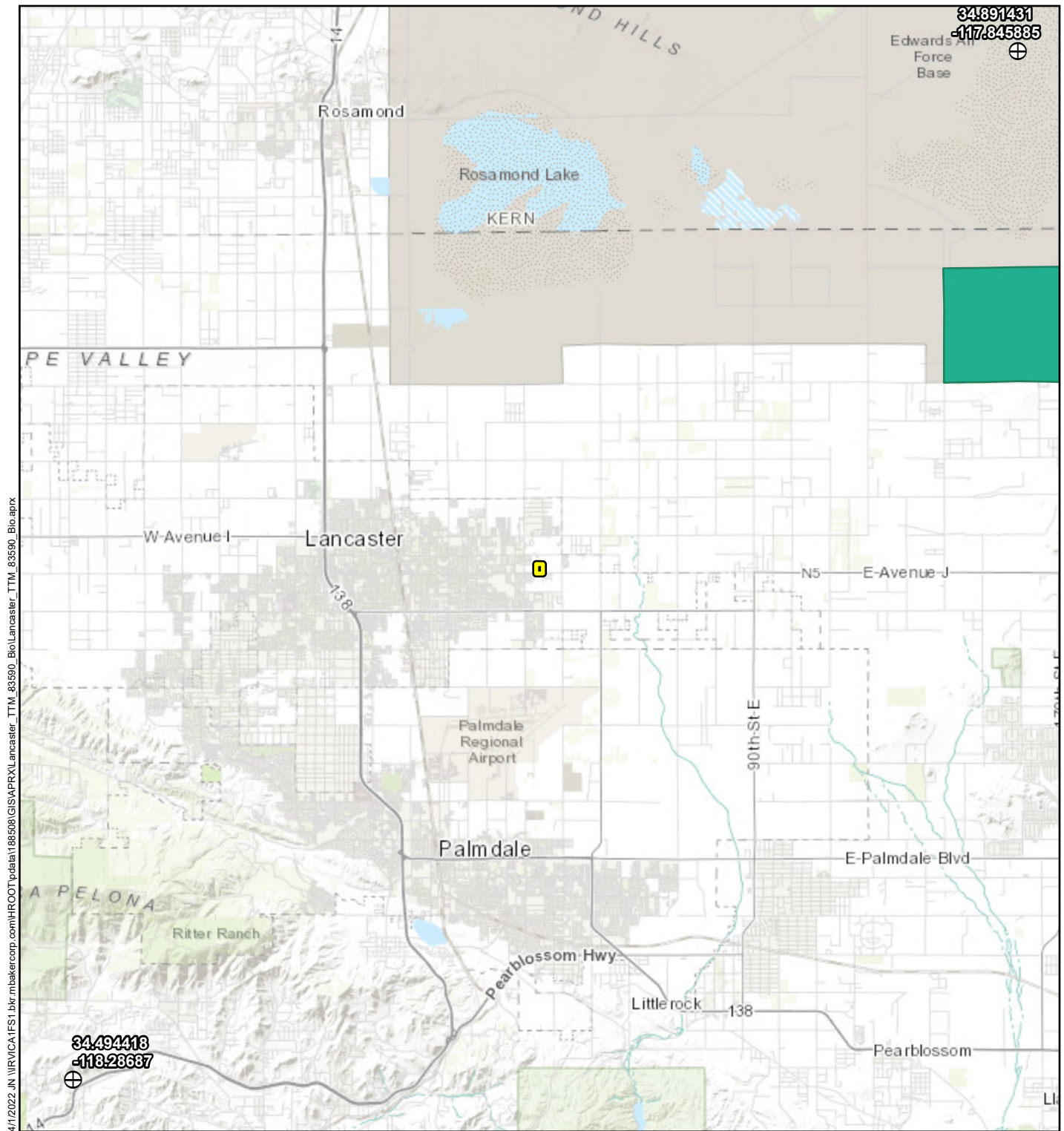
4/12/2022 JN \\IRVICA\FS1\BIR\BakerCorp.com\HROOT\pdata\185508\GIS\APRXLancaster_TTM_83590_Bio.aprx



Legend

-  Project Site
-  Rubber Rabbitbrush Scrub (*Ericamera nauseosa*) Shrubland Alliance; 28.41 acres
-  Reference Point





Legend

- Project Site
- Desert Tortoise (*Gopherus agassizii*)
- ⊕ Reference Point



Attachment B

Site Photographs



Photograph 1: Standing in the southeast portion of the project site, facing north.



Photograph 2: Standing in the southern portion of the project site, facing east.



Photograph 3: Standing in the southwest portion of the project site, facing east.



Photograph 4: Standing in the northern portion of the project site, facing south.



Photograph 5: Standing in the central portion of the project site, looking at a pile of broken concrete debris, facing northwest.



Photograph 6: Standing at the center of the project site, facing north.



Photograph 7: Standing in the southeast corner of the project site, facing north.



Photograph 8: Standing in the northeast portion of the project site, facing east.

Attachment C

Potentially Occurring Special-Status Biological Resources

Table C-1: Potentially Occurring Special-Status Biological Resources

Scientific Name Common Name	Special-Status Rank*	Habitat Preferences and Distribution Affinities	Observed On-site	Potential to Occur
SPECIAL-STATUS WILDLIFE SPECIES				
<i>Accipiter cooperii</i> Cooper's hawk	WL G5 S4	Yearlong resident of California. Generally, found in forested areas up to 3,000 feet above mean sea level (amsl) in elevation, especially near edges and rivers. Prefers hardwood stands and mature forests but can be found in urban and suburban areas where there are tall trees (25 to 50 feet high) for nesting. Prefers pines (<i>Pinus</i> spp.), oaks (<i>Quercus</i> spp.), Douglas firs (<i>Pseudotsuga</i> spp.), beeches (<i>Fagus</i> spp.), spruces (<i>Picea</i> spp.) for nesting. Common in open areas during nesting season.	No	Low (Foraging): The project site provides marginal foraging habitat for this species. This species is not expected to nest within the project site due to the lack of tall hardwood stands and mature forests.
<i>Anniella pulchra</i> Northern California legless lizard	SSC G3 S3	Typical habitat consists of sandy or loose loamy soils under sparse vegetation in chaparral, coastal dunes, and coastal scrub. Prefers soils with high moisture content.	No	Not Expected: Chaparral, coastal dunes, and coastal scrub habitat preferred by this species is not present within the project site. Soils with high moisture content also are not present on-site.
<i>Athene cunicularia</i> burrowing owl	SSC G4 S3	Yearlong resident of California. Primarily a grassland species, but it persists and even thrives in some landscapes highly altered by human activity. Occurs in open, annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. The overriding characteristics of suitable habitat appear to be burrows for roosting and nesting and relatively short vegetation with only sparse shrubs and taller vegetation.	No	Moderate: No burrowing owls or suitable burrows (>4 inches in diameter) capable of providing roosting and nesting opportunities were observed within the project site. The project site is also located near existing residential and institutional developments and there are several utility poles along nearby roadways that could provide perching opportunities for predatory raptors. However, there are eight (8) occurrence records for burrowing owl within a 5-mile radius of the project site (CDFW 2022a). The closest extant occurrence (Occurrence Number 709) was recorded in 2004, approximately 1,193 feet southeast of the project site. Additionally, another occurrence (Occurrence Number 964) was recorded in 2005, approximately 1,280 feet to the north of the project site. Additionally, the on-site rubber rabbitbrush scrub is relatively open and provides suitable foraging habitat for burrowing owl. Further, California ground squirrels were observed in the western portion of project site during the field survey and could provide suitable burrows for nesting burrowing owls, if present.

Table C-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special- Status Rank*	Habitat Preferences and Distribution Affinities	Observed On-site	Potential to Occur
<i>Buteo regalis</i> ferruginous hawk	WL G4 S3S4	Occurs in open grasslands, sagebrush flats, desert scrub, low foothills and fringes of pinyon and juniper habitats. Preys on mostly lagomorphs, ground squirrels, and mice.	No	Low (Foraging): The project site provides marginal foraging habitat for this winter species and this species does not breed in California.
<i>Buteo swainsoni</i> Swainson's hawk	ST G5 S3	Summer migrant in southern California. Typical habitat is open desert, grassland, or cropland containing scattered, large trees or small groves. Breeds in stands with few trees in juniper-sage flats, riparian areas, and in oak savannah in the Central Valley. Forages in adjacent grassland or suitable grain or alfalfa fields or livestock pastures.	No	Not Expected: This species is not expected to nest or forage within the project site due to their preference of nests being constructed adjacent to agricultural fields and other "productive" areas that have high prey bases for foraging.
<i>Charadrius montanus</i> mountain plover	SSC G3 S2S3	Found in short grasslands, freshly plowed fields, newly sprouting grain fields, and sometimes sod farms. Prefers grazed areas and areas with burrowing rodents with short vegetation, bare ground, and flat topography.	No	Not Expected: The project site does not provide preferred habitat of this species, including grasslands, grazed areas, grain fields, and sod farms.
<i>Danaus plexippus (California overwintering population)</i> monarch butterfly	FC	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts are located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	No	Not Expected: The project site does not provide suitable roosting habitat for this species. No wind-protected tree groves are present on-site.
<i>Gopherus agassizii</i> desert tortoise	FT ST G3 S2S3	Can be found in a wide variety of habitats, such as alluvial fans, desert washes, canyons, and saltbush plains; most tortoises in the Mojave Desert are usually associated with creosote bush scrub on alluvial fans and bajadas. Wildflowers, grasses, and in some cases, cacti make up the bulk of their diet. Some of the more common forbs consumed by the tortoise include desert dandelion (<i>Malacothrix glabrata</i>), primrose (<i>Camissonia</i> spp. and <i>Oenothera</i> spp.) desert plantain (<i>Plantago ovata</i>), milkvetches (<i>Astragalus</i> spp.), gilias (<i>Gilia</i> spp.), desert marigold (<i>Baileya multiradiata</i>), Mojave lupine (<i>Lupinus odoratus</i>), phacelia (<i>Phacelia</i> spp.), desert wishbone-bush (<i>Mirabilis laevis</i>), lotus (<i>Lotus</i> spp.), forget-me-knots (<i>Cryptantha</i> spp.), goldfields (<i>Lasthenia californica</i>), California coreopsis (<i>Leptosyne californica</i>), white-margin sandmat (<i>Euphorbia albomarginata</i>), and the introduced red stemmed filaree (<i>Erodium cicutarium</i>).	No	Not Expected: Suitable habitats preferred by this species are not present within the project site. Further, the project site is not located within federally designated Critical Habitat for this species.

Table C-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution Affinities	Observed On-site	Potential to Occur
<i>Gymnogyps californianus</i> California condor	FE SE FP G1 S1	Current distribution of California condor is considered to be all of the Los Padres National Forest and western half of the Angeles National Forest (USDA Forest Service 2000), with some occasionally found in the Sequoia National Forest. Nest sites are typically located in chaparral, conifer forest, or oak woodland habitats. Nest sites are in cliff caves in the mountains. Some have nested in large cavities within sequoias (<i>Sequoiadendron giganteum</i>).	No	Not Expected: The project site is located outside of the known range for this species. Further, there are no occurrence records for this species within 5.0 miles of the project site and the project site is not located within federally designated Critical Habitat for this species.
<i>Helminthoglypta fontiphila</i> Soledad shoulderband	G1 S1	Air-breathing terrestrial snail frequently found in riparian habitat (springs, seeps, along streams) and may occur in rock piles, flood-borne debris, or under dead yuccas where other cover is not available.	No	Not Expected: Riparian habitat preferred by this species is not present within the project site.
<i>Lanius ludovicianus</i> loggerhead shrike	SSC G4 S4	Yearlong resident of California. Prefers open habitats with bare ground, scattered shrubs, and areas with low or sparse herbaceous cover including open-canopied valley foothill hardwood, riparian, pinyon-juniper desert riparian, creosote bush scrub, and Joshua tree woodland. Requires suitable perches including trees, posts, fences, utility lines, or other perches. Nests in branches up to 14 feet above the ground frequently in a shrub with thorns or with tangled branching habitats.	No	Not Expected: Riparian habitats with thickets of willows that are adjacent to surface water preferred by this species for foraging and nesting are not present within the project site.
<i>Phrynosoma blainvillii</i> coast horned lizard	SSC G3G4 S3S4	Occurs in a wide variety of vegetation types including coastal sage scrub, annual grassland, chaparral, oak woodland, riparian woodland and coniferous forest. Its elevational range extends up to 4,000 feet in the Sierra Nevada foothills and up to 6,000 feet in the mountains of southern California. In inland areas, this species is restricted to areas with pockets of open microhabitat, created by disturbance (e.g., fire, floods, unimproved roads, grazing lands, and fire breaks). The key elements of such habitats are loose, fine soils with a high sand fraction; an abundance of native ants or other insects; and open areas with limited overstory for basking and low, but relatively dense shrubs for refuge.	No	Not Expected: Loose, fine sandy soils preferred by this species are not present within the project site. The project site primarily consists of compacted surface soils which likely precludes this species from occurring. Further, the known occurrence record (Occurrence Record No. 147) within 5.0 miles of the project site was recorded in 1964 (CDFW 2022a).

Table C-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution Affinities	Observed On-site	Potential to Occur
<i>Toxostoma lecontei</i> Le Conte's thrasher	G4 S3	Common yearlong resident in southern California. Typically occurs primarily in open desert wash, desert scrub, alkali desert scrub, and desert succulent shrub habitats; also occurs in Joshua tree habitat with scattered shrubs. Habitats with a high proportion of one or more species of saltbush (<i>Atriplex</i> spp.) and/or cylindrical cholla cactus (<i>Cylindropuntia</i> spp.) is preferred. The ground is generally bare or with sparse patches of grasses and annuals forming low ground cover. Prefers thick, dense, and thorny shrubs or cholla cactus for nesting.	No	Not Expected: Suitable foraging and nesting habitats preferred by this species are not present within the project site. Additionally, there are no occurrence records for this species within 5.0 miles of the project site.
<i>Xerospermophilus mohavensis</i> Mohave ground squirrel	ST G2G3 S2S3	Restricted to the Mojave Desert in creosote bush scrub (most common), desert saltbush scrub, desert sink scrub, desert greasewood scrub, shadscale scrub, Joshua tree woodland, and annual grasslands. Prefers deep, sandy to gravelly soils on flat to moderately sloping terrain; species tends to avoid rocky areas and is not known to occupy areas of desert pavement. May consume leaves, forbs, shrubs, and grasses of several species and genera, including creosote (<i>Larrea tridentata</i>), winter fat (<i>Krascheninnikovia lanata</i>), spiny hop sage (<i>Grayia spinosa</i>), freckled milk vetch (<i>Astragalus lentiginosus</i>), white mallow (<i>Eremalche exilis</i>), woolly marigold (<i>Baileya pleniradiata</i>), lilac sunbonnet (<i>Langloisia setosissima</i>), Mojave monardella (<i>Monardella exilis</i>), saltbush, gilias, golden linanthus (<i>Linanthus aureus</i>), and Mediterranean grass (<i>Schismus arabicus</i>), as well as seeds of box thorn (<i>Lycium</i> spp.).	No	Not Expected: There is no suitable habitat or soils preferred by this species within the project site. Additionally, there are no occurrence records for this species within 5.0 miles of the project site.
SPECIAL-STATUS PLANT SPECIES				
<i>Astragalus preussii</i> var. <i>laxiflorus</i> Lancaster milk-vetch	1B.1 G4T2 S1	Perennial herb. Occurs in chenopod scrub in California only near Lancaster and Edwards Air Force Base, where extremely rare. Found at approximate elevation of 2,295 feet amsl. Blooming period is March through May.	No	Not Expected: Chenopod scrub preferred by this species are not present within the project site. Additionally, the only occurrence record (Occurrence No. 1) for this species within 5.0 miles of the project site was recorded in 1902 (CDFW 2022a).
<i>Calochortus striatus</i> alkali mariposa-lily	1B.2 G3? S2S3	Perennial bulbiferous herb. Occurs in alkaline and mesic microhabitat in chaparral, chenopod scrub, Mojavean desert scrub, and meadows and seeps. Found at elevations ranging from 230 to 5,235 feet amsl. Blooming period is April through June.	No	Not Expected: Chaparral, chenopod scrub, Mojavean desert scrub, and meadows and seeps preferred by this species are not present within the project site. Additionally, there are no occurrence records for this species within 5.0 miles of the project site.

Table C-1: Potentially Occurring Special-Status Biological Resources

<i>Scientific Name</i> Common Name	Special-Status Rank*	Habitat Preferences and Distribution Affinities	Observed On-site	Potential to Occur
<i>Canbya candida</i> white pygmy-poppy	4.2 G3G4 S3S4	Annual herb. Occurs on gravelly, sandy, granitic soils in Joshua tree woodland, Mojavean desert scrub, and pinyon and juniper woodland. Found at elevations ranging from 2,297 to 5,249 feet amsl. Blooming period is March through June.	No	Not Expected: The habitats preferred by this species are not present within the project site. Additionally, the only occurrence record (Occurrence No. 11) for this species within 5.0 miles of the project site is an undated collection cited in 1922 Jepson Flora (CDFW 2022a).
<i>Chorizanthe parryi</i> var. <i>parryi</i> Parry's spineflower	1B.1 G3T2 S2	Annual herb. Occurs on sandy and/or rocky soils in chaparral, coastal sage scrub, and sandy openings within alluvial washes and margins. Found at elevations ranging from 951 to 3,773 feet amsl. Blooming period is April through June.	No	Not Expected: Chaparral, coastal sage scrub, and sandy openings within alluvial washes and margins preferred by this species are not present within the project site. Additionally, the only occurrence record (Occurrence No. 38) for this species within 5.0 miles of the project site was recorded in 1896 (CDFW 2022a).
<i>Chorizanthe spinosa</i> Mojave spineflower	4.2 G4 S4	Annual herb. Found on sometimes alkaline soils within Joshua tree woodland, playas, Mojavean desert scrub, and chenopod scrub habitats. Found at elevations ranging from 20 to 4,265 feet. Blooming period is March through July.	No	Not Expected: The habitats and soils preferred by this species are not present within the project site. Additionally, there are no occurrence records for this species within 5.0 miles of the project site.
<i>Goodmania luteola</i> golden goodmania	4.2 G3 S3	Annual herb. Occurs in Mojavean desert scrub, meadows and seeps, playas, and valley and foothill grasslands. Found at elevations ranging from 65 to 7,220 feet amsl. Blooming period is April through August.	No	Not Expected: The habitats preferred by this species are not present within the project site. Additionally, there are no occurrence records for this species within 5.0 miles of the project site.
<i>Loeflingia squarrosa</i> var. <i>artemisiarum</i> sagebrush loeflingia	2B.2 G5T3 S2	Annual herb. Occurs in sandy desert dunes, Great Basin scrub, and Sonoran desert scrub. Found at elevations ranging from 2,295 to 5,300 feet amsl. Blooming period is April through May.	No	Not Expected: Sandy desert dunes, Great Basin scrub, and Sonoran desert scrub habitats preferred by this species are not present within the project site.
<i>Yucca brevifolia</i> western Joshua tree	SCT GNR SNR	Evergreen, tree-like plant. Occurs in desert grasslands and shrublands in hot, dry sites on flats, mesas, bajadas, and gentle slopes in the Mojave Desert. Soils in Joshua tree habitats are silts, loams, and/or sands and variously described as fine, loose, well drained, and/or gravelly, while the plants can reportedly tolerate alkaline and saline soils. Found at elevations ranging from 2,461 to 7,218 feet amsl. Blooming period is March through June.	No	Not Expected: This species was not observed within the project site during the field survey. However, it is acknowledged that Joshua trees are present throughout eastern Lancaster.

* **U.S. Fish and Wildlife Service (USFWS)**

- FE Endangered – any species which is in danger of extinction throughout all or a significant portion of its range.
- FT Threatened – any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.
- FC Candidate – any species which has been designated as a candidate eligible for considering to be listed under the Federal

Endangered Species Act.

California Department of Fish and Wildlife (CDFW)

SE	Endangered – any native species or subspecies of 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.
ST	Threatened – any native species or subspecies of 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 under the California Endangered Species Act.
SCT	The classification provided to a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the Fish and Game Commission has formally noticed as being under review by the Department of Fish and Wildlife for addition to the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to the list of threatened species.
FP	Fully Protected – any native species or subspecies of bird, mammal, fish, amphibian, or reptile that were determined by the State of California to be rare or face possible extinction.
SSC	Species of Special Concern – any species, subspecies, or distinct population of fish, amphibian, reptile, bird, or mammal native to California that currently satisfies one or more of the following criteria: - is extirpated from California or, in the case of birds, in its primary seasonal or breeding role; - is listed as Federally-, but not State-, threatened or endangered; meets the State definition of threatened or endangered but has not formally been listed. - is experiencing, or formerly experienced, serious (nonscyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; or - has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State threatened or endangered status.
WL	Watch List - taxa that were previously designated as “Species of Special Concern” but no longer merit that status, or which do not yet meet SSC criteria, but for which there is concern and a need for additional information to clarify status.

California Native Plant Society (CNPS) California Rare Plant Rank

1B	Plants rare, threatened, or endangered in California and elsewhere.
2B	Plants rare, threatened, or endangered in California but more common elsewhere.
4	Plants of limited distribution – Watch List.

Threat Ranks

- .1 Seriously threatened in California (over 80% of occurrences threatened/high degree any immediacy of threat).
- .2 Moderately threatened in California (20 to 80 percent of occurrences threatened/moderate degree and immediacy of threat).

NatureServe Conservation Status Rank

The Global Rank (G#) reflects the overall condition and imperilment of a species throughout its global range. The Intraspecific Taxon Rank (T#) reflects the global situation of just the subspecies or variety. The State Rank (S#) reflects the condition and imperilment of an element throughout its range within California. (G#Q) reflects that the element is very rare but there are taxonomic questions associated with it; the calculated G rank is qualified by adding a Q after the G#. Adding a ? to a rank expresses uncertainty about the rank.

G1/T1	Critically Imperiled – At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
G2/T2	Imperiled— At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors.
G3/T3	Vulnerable— At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors.
G4/T4	Apparently Secure— Uncommon but not rare; some cause for long-term concern due to declines or other factors.
G5	Secure – Common; widespread and abundant.
GNR	Unranked – Global rank not yet assessed.
S1	Critically Imperiled – Critically imperiled in the state because of extreme rarity (often 5 or fewer occurrences) or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the State.
S2	Imperiled – Imperiled in the State because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the nation or State.
S3	Vulnerable – Vulnerable in the State due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation.
S4	Apparently Secure – Uncommon but not rare; some cause for long-term concern due to declines or other factors.
SNR	Unranked – State conservation status not yet assessed.

Attachment D

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