# Appendix D
## Biological Technical Report

ROCKS
BIOLOGICAL CONSULTING



# SANTA ANA TERMINAL PROJECT
# BIOLOGICAL TECHNICAL REPORT

San Bernardino County, California

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# 1 Introduction

This report presents the results of a biological resources assessment conducted by Rocks Biological Consulting (RBC) for the Santa Ana Terminal Project (project or proposed project) in San Bernardino County, California.

This Biological Technical Report (BTR) includes a description of the existing biological resources within and adjacent to the proposed project footprint; details the methods used to assess existing conditions and potential impacts on special-status habitats and species; and presents potential avoidance, minimization, and mitigation measures to reduce potential project impacts on biological resources.

## 1.1 PROJECT LOCATION AND DESCRIPTION

The project site is located at 249 East Santa Ana Avenue, in the City of Rialto (City), San Bernardino County, California. The City is largely urbanized and bordered by other developed cities. The approximately 45.7-acre project site ranges in elevation from approximately 900 to 955 feet above mean sea level (amsl). The project site consists of Assessor's Parcel Number (APN) 0258-141-18 and includes a 105-foot California Electric Power Company pole line easement on the southern portion of the property. The project site is provided via Interstate 10 (I-10) to the north and Interstate 215 (I-215) to the east. Local access to the project site is provided via East Santa Ana Avenue along the northern boundary of the project site.

The Santa Ana Truck Terminal Project proposes the development of a truck terminal, truck repair shop, and associated on-site improvements on an approximately 45.7-acre project site. The Project proposes an approximately 172,445-square foot truck (sf) terminal including approximately 5,890 sf of office space and an approximately 18,700 sf of repair shop including approximately 890 sf of office space. Access to the project site would be provided via one driveway along East Santa Ana Avenue. The Project would provide an emergency access driveway along East Santa Ana Avenue at the northeastern corner of the project site. The project site has a General Plan land use designation of General Industrial and is zoned Heavy Industrial (H IND) within the Agua Mansa Specific Plan. Permitted uses within the Heavy Industrial land use zone include transit and transportation terminals, repairs, and storage facilities.

## 1.2 REGULATORY FRAMEWORK

Federal, state, and local agencies have established several regulations to protect and conserve biological resources. The descriptions below provide a brief overview of agency regulations that may be applicable to the project. The regulating agencies make the final determination of what types of permits may be required for project approval.

**FEDERAL REGULATIONS**

*Federal Endangered Species Act*

The federal Endangered Species Act of 1973 (ESA; 16 U.S.C. § 1531 et seq.), as amended, provides for listing of endangered and threatened species of plants and animals and designation of critical habitat for listed species. The ESA regulates the "take" of any endangered fish or wildlife species, per Section 9. As development is proposed, the responsible agency or individual landowner is required to consult with the USFWS to assess potential impacts on listed species (including plants) or their critical habitat, pursuant to Sections 7 and 10 of the ESA. USFWS is required to make a determination as to the extent of impact a project would have on a particular species. If it is determined that potential impacts on a species would likely occur, measures to avoid or reduce such impacts must be identified. USFWS may issue an incidental take statement, following consultation and the issuance of a Biological Opinion. This allows for take of the species that is incidental to another authorized activity, provided that the action will not adversely affect the existence of the species. Section 10 of the ESA provides for issuance of incidental take permits to non-federal parties with the development of a habitat conservation plan (HCP); Section 7 provides for permitting of federal projects.

*Migratory Bird Treaty Act*

The Migratory Bird Treaty Act (MBTA; 16 U.S.C. § 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive and listed at 50 Code of Federal Regulations (CFR) 10.13. The USFWS enforces the MBTA, which prohibits "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird, or attempt such actions, except as permitted by regulation.

*Rivers and Harbors Act of 1899*

The Rivers and Harbors Act of 1899 (33 U.S.C. § 401 et seq.) prohibits discharge of any material into navigable waters, or tributaries thereof, of the United States without a permit. The act also makes it a misdemeanor to excavate, fill, or alter the course, condition, or capacity of any port, harbor, or channel; or to dam navigable streams without a permit.

Many activities originally covered by the Rivers and Harbors Act are now regulated under the Clean Water Act of 1972 (CWA; 33 U.S.C. § 1251 et seq.), discussed below. However, the 1899 act retains relevance and created the structure under which the U.S. Army Corps of Engineers (Corps) oversees CWA Section 404 permitting.

*Clean Water Act*

Pursuant to Section 404 of the CWA (33 U.S. Code § 1344), the Corps is authorized to regulate any activity that would result in the discharge of dredged or fill material into waters of the U.S. (including wetlands), which include those waters listed in 33 CFR 328.3 (51 Federal Register [FR] 41217, November 13, 1983; 53 FR 20764, June 6, 1988) and further defined by the 2001 *Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers* (SWANCC; 531 U.S. 159) decision and the 2006 *Rapanos v. United States* (547 U.S. 715) decision. The Corps, with

oversight from the U.S. Environmental Protection Agency (USEPA), has the principal authority to issue CWA Section 404 permits. The Corps would require a Standard Individual Permit (SIP) for more than minimal impacts to waters of the U.S. as determined by the Corps. Projects with minimal individual and cumulative adverse effects on the environment may meet the conditions of an existing Nationwide Permit (NWP).

A Water Quality Certification or waiver pursuant to Section 401 of the CWA (33 U.S. Code § 1341) is required for all Section 404 permitted actions. The Regional Water Quality Control Board (RWQCB), a division of the State Water Resources Control Board, provides oversight of the Section 401 certification process in California. The RWQCB is required to provide Water Quality Certification for licenses or permits that authorize an activity that may result in a discharge from a point source into a water of the U.S. Water Quality Certification authorization "is limited to assuring that a discharge from a Federally licensed or permitted activity will comply with water quality requirements" (40 CFR 121.3).

The National Pollutant Discharge Elimination System (NPDES) is the permitting program for discharge of pollutants into surface waters of the U.S. under Section 402 of the CWA (33 U.S. Code § 1342).

**STATE REGULATIONS**

*California Environmental Quality Act*

The California Environmental Quality Act (CEQA; California Public Resources Code § 21000 et seq.) was established in 1970 as California's counterpart to NEPA. CEQA requires state and local agencies to identify significant environmental impacts of their actions and to avoid or mitigate those impacts, where feasible.

CEQA applies to certain activities of state and local public agencies. A public agency must comply with CEQA when it undertakes an activity defined by CEQA as a "project." A project is an activity undertaken by a public agency or a private activity, which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency that may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

*California Endangered Species Act and Natural Community Conservation Planning Act*

The California Endangered Species Act of 1984 (CESA; California Fish and Game Code [CFGC] § 2050 et seq.), in combination with the California Native Plant Protection Act of 1977 (CFGC § 1900 et seq.), regulates the listing and take of plant and animal species designated as endangered, threatened, or rare within the state. California also lists Species of Special Concern based on limited distribution; declining populations; diminishing habitat; or unusual scientific, recreational, or educational value. The California Department of Fish and Wildlife (CDFW) is responsible for assessing development projects for their potential to impact listed species and their habitats. State-listed special-status species are addressed through the issuance of a 2081 incidental take permit (Memorandum of Understanding).

In 1991, the California Natural Community Conservation Planning (NCCP) Act (CFGC § 2800 et seq.) was approved and the NCCP Coastal Sage Scrub program was initiated in Southern California. The NCCP program was established "to provide for regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development and growth." The NCCP Act encourages preparation of plans that address habitat conservation and management on an ecosystem basis rather than one species or habitat at a time.

*California Fish and Game Code Sections 1600-1602*

Pursuant to Division 2, Chapter 6, Section 1602 of the CFGC, CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel or bank of any river, stream or lake that supports fish or wildlife. A Lake or Streambed Alteration Agreement Application must be submitted to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake" (CFGC § 1602). CDFW has jurisdiction over riparian habitats associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources. CDFW reviews the proposed actions and, if necessary, submits (to the applicant) a proposal that includes measures to protect affected fish and wildlife resources. The final proposal that is mutually agreed upon by CDFW and the applicant is the Lake or Streambed Alteration Agreement.

*California Fish and Game Code Sections 3503, 3511, 3513, 3801, 4700, 5050, and 5515*

CDFW protects and manages fish, wildlife, and native plant resources within California. The California Fish and Game Commission and/or CDFW are responsible for issuing permits for the take or possession of protected species. The following sections of the CFGC address protected species: Section 3511 (birds), Section 4700 (mammals), Section 5050 (reptiles and amphibians), and Section 5515 (fish). In addition, the protection of birds of prey is provided for in Sections 3503, 3513, and 3800 of the CFGC.

*California Desert Native Plant Act (California Food and Agriculture Code §§ 80001–80201)*

The California Desert Native Plants Act prohibits the removal of certain species of California desert native plants on public and privately owned lands without a valid permit from the sheriff or commissioner of the county where collecting would occur. This act applies within the boundaries of Imperial, Inyo, Kern, Los Angeles, Mono, Riverside, San Bernardino, and San Diego Counties.

*Porter-Cologne Water Quality Control Act*

The Porter-Cologne Water Quality Control Act (California Water Code § 13000 et seq.) provides for statewide coordination of water quality regulations. The State Water Resources Control Board was established as the statewide authority and nine separate RWQCBs were developed to oversee water quality on a day-to-day basis.

The RWQCBs have primary responsibility for protecting water quality in California. As discussed above, the RWQCBs regulate discharges to surface waters under the CWA. In addition, the RWQCBs are responsible for administering the Porter-Cologne Water Quality Control Act.

Pursuant to the Porter-Cologne Water Quality Control Act, the state is given authority to regulate waters of the state, which are defined as any surface water or groundwater, including saline waters. As such, any person proposing to discharge waste into a water body that could affect its water quality must first file a Report of Waste Discharge if a Section 404 permit is not required for the activity. "Waste" is partially defined as any waste substance associated with human habitation, including fill material discharged into water bodies.

#### REGIONAL AND LOCAL PLANS

*County of San Bernardino Land Use Services, Planning Division*

According to the County's Biotic Resources Overlay Map, the project site is located within the Burrowing Owl Overlay Zone (County of San Bernardino 2012). The burrowing owl is listed as a Species of Special Concern by CDFW.

# 2 Methods

RBC conducted vegetation mapping, a general biological survey, and habitat assessments for special-status species, including, but not limited to, burrowing owl (*Athene cunicularia;* BUOW), Delhi Sands flower-loving fly (*Raphiomidas terminatus abdominalis*; DSFLF), and coastal California gnatcatcher (*Polioptila californica californica*; CAGN). Additionally, RBC conducted a constraints-level aquatic resources assessment followed by a formal aquatic resources delineation to determine if the features on site could be considered jurisdictional under the Corps pursuant to Section 404 of the CWA, under the RWQCB pursuant to Section 401 of the CWA and the Porter-Cologne Water Quality Control Act, and under the CDFW pursuant to Section 1602 of the CFGC. RBC also assessed the site for its functionality as a regional and local wildlife corridor.

The vegetation mapping, general biological survey, and habitat assessments were conducted within an approximately 61.6-acre survey area, which included the approximately 45.7-acre project site and a surrounding 100-foot survey buffer. However, only the project site information is included in report impact calculations and tables, while the buffer is illustrated within the figures for informational purposes and edge effects analysis only. Survey buffer areas are included in this analysis to assess the potential for special-status species or resources in areas immediately adjacent the project site that could be impacted by the proposed project analyzed herein. Such information should not be considered comprehensive for all biological resources or aquatic resources that may occur in buffer areas, and buffer mapping is intended only for the project analysis outlined herein; such information is not intended for impact analysis of any future projects within or adjacent to project buffer areas.

## 2.1 DATABASE SEARCH

Prior to conducting the field survey, existing information regarding biological resources present or potentially present within the survey area was obtained through a review of pertinent literature and databases, including, but not limited to:

- CDFW California Natural Diversity Database (CNDDB; CDFW 2022a)

- California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants (CNPS 2022)
- USFWS Special-Status Species Database (USFWS 2022a)
- USFWS IPaC Database (USFWS 2022b)
- USFWS National Wetlands Inventory (NWI) Database (USFWS 2022c)
- USGS National Hydrography Dataset (NHD) Database (USGS 2022)
- CDFW Biogeographic Information and Observation System (BIOS) Database (CDFW 2022b)
- *Crown Enterprises Cross Dock Project Biotic Resources Report* (RBC 2017)

The CNDDB (CDFW 2022a) and USFWS (USFWS 2022a) queries were conducted for the project site plus a 1-mile radius. The CNPS Electronic Inventory (CNPS 2022) search was conducted for the San Bernardino South USGS 7.5' quadrangle containing the project site and the eight surrounding USGS 7.5' quadrangles, within the project site's elevation range of 700 to 1,100 feet above mean sea level (amsl).

The potential for special-status species to occur within the survey area was refined by considering the habitat affinities of each species, field habitat assessments, vegetation mapping, and knowledge of local biological resources. Additionally, the potential for occurrence tables created for the project (see Section 3) include all federally and state-listed species, federal and state candidate species for listing, other state-designated special-status species that have been reported within one mile of the project site (CNDDB and USFWS special-status species databases), federally listed species identified as having potential to occur based on their known or expected ranges (IPaC), as well as all species with a California Rare Plant Rank (CRPR) that occur within the nine quadrangle search (CNPS 2022).

## 2.2 VEGETATION MAPPING AND GENERAL BIOLOGICAL SURVEYS

On October 14, 2021, RBC biologists Ian Hirschler and Hannah Swarthout conducted vegetation mapping in the field to provide a baseline of the biological resources that occur or have the potential to occur within the survey area. RBC conducted vegetation mapping by walking throughout the project site and mapping vegetation communities on aerial photographs at a 1:2400 scale (1 inch = 200 feet).

The extent of each habitat type (delineated as a habitat polygon on the vegetation maps) was calculated using the Geographic Information System (GIS) application ArcGIS. Habitats were classified based on the dominant and characteristic plant species in accordance with vegetation community classifications outlined in Holland's *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986). The vegetation communities were also cross walked with *A Manual of California Vegetation, 2nd Edition* (MCV2; Sawyer et al. 2009), and the equivalent classification is provided in Table 1 of Section 3.2 below.

RBC conducted a general biological survey for plants and wildlife concurrently with vegetation mapping. Photos taken during the general biological survey are provided in Appendix A. Plant species encountered during the field survey were identified and recorded in a field notebook. Plant species that could not be identified were brought to the laboratory for identification using the dichotomous keys in the *Jepson Manual* (Baldwin et al. 2012). A list of the vascular plant species observed in the survey area is presented in Appendix B.

Wildlife species were documented during the field survey by sight, calls, tracks, scat, or other signs, and were recorded in a field notebook. Binoculars (8X42 magnification) were used to aid in the identification of wildlife. A list of the wildlife species observed in the survey area is presented in Appendix B; scientific and common names of wildlife follow CDFW *California's Wildlife* (2022c) and the *All About Birds* (Cornell Lab of Ornithology 2022). Twilight/nighttime surveys were not conducted, therefore crepuscular and nocturnal animals are likely under-represented in the project species list; however, habitat assessments were performed for all special-status species to ensure that any potentially present rare species are adequately addressed herein.

The location of any observed biological resources designated as special-status by the USFWS, CDFW, and/or CNPS, were recorded in a field notebook, on aerial maps, and/or a handheld Global Positioning System (GPS) device. RBC also assessed the survey area for habitat with the potential to support special-status plant and wildlife species. Expected wildlife use of the project site was assessed based on the results of the species database queries, known habitat preferences of local species, and knowledge of their biogeographic distribution in the region.

## 2.3 AQUATIC RESOURCES DELINEATION

Based on information gathered during the constraints-level aquatic resources assessment in October 2021, RBC regulatory specialists Sarah Krejca and Kelsey Woldt conducted a formal aquatic resources delineation on November 2, 2022 to identify areas that may be considered jurisdictional under the Corps pursuant to Section 404 of the CWA, the RWQCB pursuant to Section 401 of the CWA and the Porter-Cologne Water Quality Control Act, and the CDFW pursuant to Section 1602 of the CFGC. The review area included only the project site.

Prior to the formal aquatic resources delineation, field maps were created using GIS and a color aerial photograph at a 1 inch = 300 feet scale. RBC staff reviewed USGS NHD (USGS 2022) and topography data, USFWS NWI data (USFWS 2022c), and NRCS soils data (NRCS n.d.) to further determine the potential locations of aquatic resources within the review area. RBC also utilized Google Earth Pro to assess current and historic presence or absence of flows and/or ponding in the review area (Google Earth Pro 2022).

Staff evaluated all areas with depressions, drainage patterns, wetland vegetation, and/or riparian vegetation within the review area for potential jurisdictional status, with focus on the presence of defined channels and/or wetland vegetation, riparian vegetation, soils, and hydrology.

If present, lateral limits of potential non-wetland waters of the U.S. for the Corps and the RWQCB would be identified using field indicators of an Ordinary High Water Mark (OHWM) as outlined in *A Field Guide to the Identification of the Ordinary High Water Mark in the Arid West Region of the*

*Western United States* (Corps 2008a). Additionally, staff examined potential Corps and RWQCB jurisdictional wetland areas using the routine determination methods set forth in Part IV, Section D, Subsection 2 of the 1987 *Corps of Engineers Wetland Delineation Manual* (Environmental Laboratory 1987), the *2008 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region Version 2.0* (Corps 2008b), and The State Policy for Water Quality Control: State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (SWRCB 2021).

If present, CDFW potential jurisdictional boundaries would be determined based on the presence of lake and/or streambed and riparian habitat or wetland areas supported by (i.e., adjacent or connected to) a lake or streambed, based on the definition of streambed as outlined at 14 California Code of Regulations (CCR) § 1.72 and further clarified in the 1987 *Rutherford v. State of California* decision (188 Cal. App. 3d 1268).

## 2.4 WILDLIFE CORRIDORS

RBC assessed the project site for its potential to serve as a wildlife corridor. A wildlife corridor can be defined as a physical feature that links wildlife habitat, often consisting of native vegetation that joins two or more larger areas of similar wildlife habitat. Corridors enable migration, colonization, and genetic diversity through interbreeding and are therefore critical for the movement of animals and the continuation of viable populations. Corridors can consist of large, linear stretches of connected habitat (such as riparian vegetation) or as a sequence of stepping-stones across the landscape (discontinuous areas of habitat such as wetlands and ornamental vegetation), or corridors can be larger habitat areas with known or likely importance to local fauna.

Regional corridors are defined as those linking two or more large patches of habitat, and local corridors are defined as those allowing resident animals to access critical resources (food, cover, and water) in a smaller area that might otherwise be isolated by urban development. A viable wildlife migration corridor consists of more than an unobstructed path between habitat areas. Appropriate vegetation communities must be present to provide food and cover for both transient species and resident populations of less mobile animals. There must also be a sufficient lack of stressors and threats within and adjacent to the corridor for species to use it successfully.

RBC also reviewed the CDFW BIOS database to determine if the project site is located within an Essential Connectivity Area, as mapped through the California Essential Habitat Connectivity (CEHC) Project (CDFW 2022b).

# 3 Results

This section discusses the results of the literature review, vegetation mapping, general biological survey, special-status species habitat assessments, initial aquatic resource assessment, and the wildlife corridor assessment. Special-status biological resources are also discussed in this section and are defined as follows: 1) species that have been given special recognition by federal, state, or local conservation agencies and organizations due to limited, declining, or threatened/endangered population sizes; 2) species and their associated habitat types recognized by local and regional resource agencies as sensitive; 3) habitat areas or vegetation communities that are unique, are of relatively limited distribution, or are of particular value to wildlife; 4) wildlife corridors and habitat linkages; and/or 5) biological resources that may or may not be considered sensitive, but are regulated under local, state, and/or federal laws.

## 3.1 PHYSICAL SETTING

The project site is relatively flat with on-site elevations ranging from 900 to 955 feet amsl. Surrounding land uses includes industrial and manufacturing facilities to the north, west, and east, and a construction disposal facility to the south.

## 3.2 VEGETATION COMMUNITIES AND LAND COVERS

The survey area supports seven vegetation communities and two land covers (Figure 2), classified in accordance with *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986) and cross walked with MCV2 (Sawyer et al. 2009). Table 1 provides a summary of vegetation acreages for the survey area and vegetation descriptions throughout this section refer to MCV2 (Sawyer et al. 2009).

Table 1. Summary of Vegetation Communities/Land Covers within the Survey Area

| Vegetation (Holland)[1] | Vegetation[2] | Global/ State Rank | Survey Area (acres) |
|---|---|---|---|
| Developed | Developed/Disturbed | No Rank | 16.8 |
| Disturbed Habitat | Developed/Disturbed | No Rank | 13.5 |
| Mulefat Scrub | Mulefat Thickets | G5/S5 | 0.1 |
| Non-native grassland | Upland Mustards or Star Thistle Fields | No Rank | 20.5 |
| Riversidian Sage Scrub | Brittle Bush Scrub | G5/S4 | 0.6 |
| Riversidian Sage Scrub – Disturbed | Brittle Bush Scrub - Disturbed | G5/S4 | 2.4 |
| Riversidian Upland Sage Scrub | California Sagebrush – (Purple Sage) Scrub | G5/S5 | 1.1 |
| Riversidian Upland Sage Scrub - Disturbed | California Sagebrush – (Purple Sage) Scrub - Disturbed | G5/S5 | 4.4 |
| Tamarisk Scrub | Tamarisk Thickets | No Rank | 2.1 |
| Total | | | 61.6 |

[1] Vegetation communities recognized by Holland (1986)

[2] Vegetation crosswalked to MCV2 (Sawyer et al. 2009)

*Brittle Bush Scrub*

Brittle bush scrub is a monotypic form of sage scrub dominated by brittle bush (*Encelia farinosa*) in the shrub strata. The brittle bush scrub within the survey area supports small to medium sized woody shrubs dominated by brittle bush with open space between the shrub cover (Figure 2).

This vegetation community is ranked as G5/S4, meaning it is globally secure and "uncommon but not rare" in California; there is "some cause for long-term concern due to declines or other factors" (CNPS 2022). Due to its CNPS ranking, CDFW does not consider brittle bush scrub habitat as a sensitive natural community under CEQA (CDFW 2022d).

*Brittle Bush Scrub – Disturbed*

Brittle bush scrub – disturbed is composed of the same vegetation as brittle bush scrub; however, the small to medium-sized woody shrubs are sparser and the open space is disturbed with litter and/or non-native vegetation (Figure 2).

This vegetation community is ranked as G5/S4, meaning it is globally secure and "uncommon but not rare" in California; there is "some cause for long-term concern due to declines or other factors" (CNPS 2022). Due to its CNPS ranking, CDFW does not consider brittle bush scrub - disturbed habitat as a sensitive natural community under CEQA (CNPS 2022).

*California Sagebrush – (Purple Sage) Scrub*

The California sagebrush – (purple sage) scrub occurs in the southeast corner of the survey area and is composed of one to two-tiered shrub layers less than five meters tall. This vegetation community is co-dominated by California sagebrush (*Artemisia californica*) and brittle bush (Figure 2).

This vegetation community is ranked as G5/S5, meaning it is secure globally and throughout the state (CNPS 2022). Due to its CNPS ranking, CDFW does not consider California sagebrush – (purple sage) scrub habitat as a sensitive natural community under CEQA (CNPS 2022).

*California Sagebrush – (Purple Sage) Scrub – Disturbed*

The California sagebrush – (purple sage) scrub – disturbed is composed of the same vegetation layers as its undisturbed community; however, the small to medium-sized woody shrubs are sparser and the open space is disturbed with litter and/or non-native vegetation. This vegetation community occurs along the western portion of the survey area (Figure 2).

This vegetation community is ranked as G5/S5, meaning it is secure globally and throughout the state. Due to its CNPS ranking, CDFW does not consider California sagebrush – (purple sage) scrub habitat as a sensitive natural community under CEQA (CNPS 2022).

*Developed*

Developed land within the project site supports little to no native vegetation and is comprised of human-made structures (buildings, pavement, fencing, etc.). The area mapped as developed within the survey area is an active truck park with graded bare ground surfaces (Figure 2).

Developed habitat is not recognized by CDFW (CNPS 2022); therefore, it is not considered a sensitive natural community under CEQA.

*Disturbed*

Disturbed habitat on site is dominated by non-native species such as castor bean (*Ricinus communis*), tree tobacco (*Nicotiana glauca*), tocalote (*Centaurea melitensis*), short-pod mustard (*Hirschfeldia incana*), ripgut grass (*Bromus diandrus*), Russian thistle (*Salsola tragus*), and stinknet (*Oncosiphon piluliferum*). There are a few scattered native species throughout the disturbed habitat such as doveweed (*Croton setiger*), telegraph weed (*Heterotheca grandiflora*), annual bur-sage (*Ambrosia acanthacarpa*), and deerweed (*Acmispon glaber*); however, they are isolated occurrences and do not function as separate vegetation communities or land cover types. The trash and footpaths observed throughout the site suggest frequent disturbance, and previous earth-moving activities have resulted in earthen mounds piled in the eastern portion of the project site (Figure 2).

Disturbed land is not recognized by CDFW (CNPS 2022); therefore, it is not considered a sensitive natural community under CEQA.

*Mulefat Thickets*

The mulefat (*Baccharis salicifolia*) thickets within the project site occur in two small areas in the western portion of the survey area. The southern portion of mulefat thickets occurs adjacent to tamarisk (*Tamarix ramosissima*) thickets but all mulefat thickets on site are otherwise isolated from any other areas of riparian habitat and are surrounded by upland vegetation (Figure 2). Mulefat is an evergreen shrub with willow-like leaves. Mulefat scrub occurs in both seasonally or intermittently flooded habitat, and stands are variable depending on the amount of inundation and scouring. Stands usually form open shrublands or thickets in riparian corridors and along lake margins (CNPS 2022).

Mulefat scrub is ranked as G4/S4. The ranking indicates that globally and statewide the alliance is considered apparently secure and “uncommon but not rare; some cause for long-term concern due to declines or other factors” (CNPS 2022) therefore, CDFW does not consider this vegetation community to be special-status under CEQA.

*Upland Mustards or Star Thistle Fields*

Upland mustards within the survey area supports stands of short-pod mustard amongst lower numbers of other non-native species including foxtail brome (*Bromus rubens*), ripgut brome, tocalote, and Russian thistle. Upland mustard habitat occurs in the southern half of the survey area (Figure 2). These areas were likely historically disturbed and subsequently colonized by ruderal mustard species.

CDFW does not consider any of semi-natural stands, including upland mustards, as special-status biological resources under CEQA (CNPS 2022).

*Tamarisk Thickets*

Tamarisk thickets occur in the northern portion of the survey area (Figure 2). Tamarisk species are long-lived shrubs or trees with extensive and deep root systems. This species consumes large quantities of water and have invaded the native vegetation in riparian areas where they develop dense, monospecific stands across floodplains and wetlands throughout the western United States (CNPS 2022). This vegetation community can also occur in areas that receive an increased amount of runoff from surrounding land uses.

Tamarisk thickets have a rank of High under the California Invasive Plant Council (Cal-IPC 2006) and are not recognized by CDFW as a special-status vegetation community.

## 3.3 JURISDICTIONAL AQUATIC RESOURCES

Based on the formal aquatic resources delineation, the project site supports three erosional features (EF-1 and EF-2; Figure 2) that abruptly start and stop within the project site and are not expected to be jurisdictional by the Corps, RWQCB, or CDFW. EF-1, which occurs within a topographic low point in the northeastern portion of the project site, appeared to direct runoff from the paved truck lot to the north and from the slopes of the large fill piles that surround the area (Figure 2). ODP 2, taken in an area of disturbed habitat within EF-1, exhibited an abrupt break in bank slope, but did not exhibit a distinctive change in average sediment texture, change in vegetation species or cover, or any other OHWM indicators (Figure 2; Appendix C, ODP 2).

Similarly, EF-2, which occurs within a topographic low point in the center portion of the project site, appeared to direct runoff from a portion of the highly disturbed project site that was dotted by numerous large fill piles that directed sheet flows to the lower topographic areas (Figure 2). ODP 1, taken in disturbed habitat within EF-2, exhibited an abrupt/highly incised break in bank slope and a slight change in vegetation cover and species from the surrounding uplands based on an increased presence of castor bean within the erosional feature; however, the feature did not show evidence of recent flows based on the presence of a dense layer of leaf litter and debris, lack of a distinctive change in average sediment texture, and the established vegetation, particularly in the southern extent.

Additionally, this erosional feature abruptly started and stopped on site and occurred in an area of lower topography from the surrounding upland areas that were covered in piles of fill that appeared to redirect sheet flow toward this erosional feature. Thus, EF-1 and EF-2 were determined to not have an OHWM or defined bed and bank. Additionally, based on the abrupt start and stop to these features, EF-1 and EF-2 appeared to receive flows infrequently and do not convey flows downstream; instead, once these features terminate, flows collect at topographic low areas with no connection to downstream aquatic resources.

During the October 2021 constraints-level survey, RBC biologists observed soil cracking, slight depressional areas, and several areas of tamarisk thickets throughout portions of the project site. RBC also observed a single Goodding's black willow (*Salix gooddingii)* and one small area of

mulefat thickets within the southern portion of the project site during the constraints-level survey; Goodding's black willow, tamarisk, and mulefat are wetland indicator plant species per the Corps' *Arid West 2020 Regional Wetland Plant List* (Corps 2020; Figure 2).

Based on the results of the constraints-level survey, during the formal delineation, RBC regulatory specialists collected data at four Wetland Data Form Points (WDP) within the project site to determine the presence or absence of federally/state-jurisdictional wetlands (Figure 2; Appendix C, WDP 1 – WDP 4). WDP 1, WDP 3, and WDP 4 were taken within areas mapped as tamarisk thickets; WDP 2 was taken within an area mapped as upland mustards of star thistle fields, but directly adjacent to the single Goodding's black willow (Figure 2). All four WDPs were taken within soils mapped as non-hydric per the NRCS (i.e., Quarries and Pit soils) (NRCS n.d.; Figure 4). Although Delhi fine sand, a soil mapped as hydric per the NRCS, is located in the southwestern corner of the project site, this area did not exhibit any soil cracking or other wetland hydrology indicators and was dominated by upland plant species, including California sagebrush, short-pod mustard, and brittle bush, which are not wetland indicator plant species per the Corps' *Arid West 2020 Regional Wetland Plant List*; as such, a WDP was not taken within this area of the project site.

Specifically, WDP 1 was taken in a highly incised erosional feature (EF-2) near the center of the project site. WDP 1 met the hydrophytic vegetation parameter; however, WDP 1 did not meet the hydric soil or wetland hydrology parameters. WDP 2, taken directly adjacent to a single, mature Goodding's willow within the southern portion of the project site, did not meet the hydrophytic vegetation, hydric soil, or wetland hydrology parameters. WDP 3, taken within a depressional area in the western portion of the project site, met the hydrophytic vegetation parameter; however, WDP 3 did not meet the hydric soil or wetland hydrology parameters. WDP 4, taken within a slight depressional area with cracked soils in the northeastern portion of the project site just south of the paved truck lot and surrounded by fill piles, met the hydrophytic vegetation and wetland hydrology parameters; however, WDP 4 did not meet the hydric soil parameter. As such, no Corps- or RWQCB-jurisdictional wetlands or CDFW-jurisdictional wetland habitat associated with a streambed occur within the project site.

Based on the results of the formal delineation, the project site is not expected to support aquatic resources jurisdictional by the Corps, RWQCB, or CDFW since the erosional features did not have an OHWM or defined bed and bank, appeared to receive flows infrequently, and do not convey flows downstream. Please note that a formal, project-specific aquatic resources delineation report (ARDR) per Corps' standards and guidelines and further coordination with the Corps, RWQCB, and CDFW would be required to receive an official determination from the Corps and concurrence from the RWQCB and CDFW related to potential aquatic resources on site (i.e., that the project site does not support jurisdictional aquatic resources).

## 3.4 PLANTS AND WILDLIFE

The survey area supports a limited diversity of vegetation communities and a low diversity of plant and wildlife species, including 22 plant species, one reptile species, 15 bird species, and two mammal species (Appendix B).

For the purposes of this report, species are considered to have special-status if they meet one or more of the following criteria:

- Listed or considered for listing or proposed for listing under the ESA or CESA (CDFW 2022a; USFWS 2022a)
- CDFW Species of Special Concern (CDFW 2022a)
- CDFW Fully Protected Species (CDFW 2022a)
- CDFW Watch List Species (CDFW 2022a)
- Listed as CRPR 1or 2 (CNPS 2022)

### 3.4.1 SPECIAL-STATUS PLANT SPECIES

As mentioned above and clarified in this section, special-status plant species include those that are: 1) listed or proposed for listing by federal or state agencies as threatened or endangered; 2) CRPR 1 or 2 plant species (CNPS 2022); or 3) considered rare, endangered, or threatened by the CDFW (CDFW 2022a) or other local conservation organizations or specialists.

In the state of California, CNPS is a statewide resource conservation organization that has developed an inventory of California's sensitive plant species. The CRPR system is recognized by the CDFW and essentially serves as an early warning list of potential candidate species for threatened or endangered status. The CRPR system is categorized as outlined in Table 2.

Table 2. California Rare Plant Rank Definitions

| | | |
|---|---|---|
| CRPR | 1A | presumed extirpated in California and rare or extinct elsewhere |
| | 1B | rare, threatened, or endangered in California and elsewhere |
| | 2A | presumed extirpated in California but more common elsewhere |
| | 2B | rare, threatened, or endangered in California but more common elsewhere |
| | 3 | plants for which more information needed |
| | 4 | plants of limited distribution |
| CRPR Threat Ranks | 0.1 | Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat) |
| | 0.2 | Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat) |
| | 0.3 | Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known) |

Special-status plants and their potential to occur within the survey area are assessed in Table 3. Please note that plant species with low potential to occur or not expected to occur are not addressed further in this report; because these species have low or no potential for occurrence, no impacts are anticipated on these species.

Table 1. Assessment of Special-Status Plant Species Potential to Occur

| Species | Status | Habitat Description | Potential to Occur |
|---|---|---|---|
| Gambel's water cress (*Nasturtium gambelii*) | FE, ST, CRPR 1B.1 | Perennial rhizomatous herb. Blooms April – October. Marshes and swamps. Elevation 15-1,085 feet. | None. No suitable habitat present on site. |
| Marsh sandwort (*Arenaria paludicola*) | FE, SE, CRPR 1B.1 | Perennial herb. Blooms May – August. Freshwater marsh. | None. No suitable habitat present on site. |
| Mesa horkelia (*Horkelia cuneata* var. *puberula*) | CRPR 1B.1 | Perennial herb. Blooms February-September. Maritime chaparral, cismontane woodland, and coastal scrub. Elevation 230-2,657 feet. | None. The disturbed scrub habitat and soils on site are not suitable for this species. |
| Parish's bush-mallow (*Malacothamnus parishii*) | CRPR 1A | Perennial deciduous shrub. Blooms June-July. Chaparral and coastal scrub. Elevation 1,000-1,495 feet. | None. This perennial shrub would have been observed if present. |
| Parish's gooseberry (Ribes divaricatum var. parishii) | CRPR 1A | Perennial deciduous shrub. Blooms February – April. Riparian woodland. Elevation 215 – 985 feet. | None. No suitable habitat present on site. |
| Peruvian dodder (Cuscuta obtusiflora var. glandulosa) | CRPR 2B.2 | Parasitic annual vine. Blooms July – October. Marshes and swamps. Elevation 50-920 feet. | None. No suitable habitat present on site. |
| Pringle's monardella (*Monardella pringlei*) | CRPR 1A | Annual herb. Blooms May-June. Coastal scrub (sandy). Elevation 985-1,310 feet. | Very low. Disturbed scrub habitat on-site is marginally suitable for this species. |
| Salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*) | FE, SE, 1B.2 | Annual herb. Coastal dunes and coastal salt marshes and swamps. 0-98 feet. Blooming period: May – October. | None. No suitable habitat present on site. |
| Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*) | FE; SE; CRPR 1B.1 | Perennial herb. Blooms April-September. Chaparral and coastal alluvial fan scrub. Elevation 298-2,000 feet. | None. No suitable habitat present on site. |
| FE: Federally Endangered under the ESA<br>SE: State Endangered under the CESA<br>ST: State Threatened under the CESA<br>CRPR: California Rare Plant Rank | | | |

Although a focused rare plant survey was not conducted, no federally or state-listed as threatened or endangered plant species were observed during the field survey and none have moderate or high potential to occur on site. Additionally, no other special-status plants were observed during the field survey, and none have a moderate or high potential to occur based on the disturbed nature of the site and lack of suitable habitats (Table 3).

### 3.4.2 SPECIAL-STATUS WILDLIFE SPECIES AND CRITICAL HABITATS

No federally or state-listed endangered or threatened species were observed within or immediately adjacent to the project site during project surveys, and no other special-status wildlife species were observed on site.

Although not documented within the survey area, six listed species, CAGN, DSFLF, least Bell's vireo (*Vireo bellii pusillus*), Santa Ana sucker (*Catostomus santaanae*), southern California DPS steelhead (*Oncorhynchus mykiss irideus*, pop. 10), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) have been documented within one mile of the project site (Figure 3a and 3b). An analysis of the potential for special-status wildlife to occur within the survey area is provided in Table 4.

Please note that wildlife species with low or no potential to are not addressed further in this report. For the species that have low or no potential for occurrence, no impacts are anticipated on these species.

Table 2. Assessment of Special-Status Wildlife Species Potential to Occur

| Species | Status | Habitat Description | Potential to Occur |
|---|---|---|---|
| INVERTEBRATES | | | |
| Delhi Sands flower-loving fly *(Rhaphiomidas terminatus abdominalis)* | FE | Found in sandy areas composed of Delhi fine sands, stabilized by sparse native vegetation. | **None**. No suitable Delhi fine sands soils present on site. Historically mapped Delhi fine sands soils are now eroded, compacted, and over-vegetated. |
| FISH | | | |
| Arroyo chub (*Gila orcuttii*) | SSC | Found in slow-flowing or backwater areas of streams or rivers with mud or sand substrates. | **None**. No suitable habitat present on site. |
| Santa Ana sucker *(Catostomus santaanae)* | FT | Found in small permanent streams. | **None**. No suitable habitat present on site. |
| Steelhead – Southern California DPS (*Oncorhynchus mykiss irideus* pop. 10) | FE | Inhabits small to moderately large, well-oxygenated, shallow rivers with gravel bottoms. | **None**. No suitable habitat present on site. |
| REPTILES | | | |
| California glossy snake (*Arizona elegans occidentalis*) | SSC | Found in arid scrub, rocky washes, grasslands, and chaparral habitats. Prefers habitats containing open areas and loose soils for burrowing. | **Low**. Disturbed scrub habitat on site is marginally suitable for this species. |
| Coastal whiptail (*Aspidoscelis tigris stejnegeri*) | SSC | A variety of rocky, sandy, dry habitats including sage scrub, chaparral, woodlands on friable loose soil. | **Low**. Disturbed scrub habitat on-site is marginally suitable and species typically occurs closer to the coast. |
| Southern California legless lizard *(Anniella stebbinsi)* | SSC | Found in a variety of habitats including coastal dunes, sandy washes, and alluvial fans, containing moist, loose soils. | **None**. No suitable habitat present on site. |

| Species | Status | Habitat Description | Potential to Occur |
|---|---|---|---|
| BIRDS | | | |
| Burrowing owl *(Athene cunicularia)* | SSC | Found in grasslands and open scrub from coast to foothills. Strongly associated with California ground squirrel and other fossorial mammal burrows. | Low-moderate. Very few suitable burrows observed on site; however, this species is known to occur within the general area and frequently inhabits disturbed areas. |
| Coastal California gnatcatcher *(Polioptila californica californica)* | FT; SSC | Found in sage scrub and adjacent chaparral habitats often containing buckwheat or sagebrush. | Low. Disturbed scrub habitat on site is relatively small and isolated from larger landscapes of natural habitat. |
| Least Bell's vireo (*Vireo bellii pusillus*) | FE (when nesting); SE (when nesting) | Riparian woodland with understory of dense young willows or mulefat and willow canopy. Nests often placed along internal or external edges of riparian thickets. | None. No suitable nesting habitat present on site. |
| Western yellow-billed cuckoo *(Coccyzus americanus occidentalis)* | FT; SE | Exclusively inhabits large contiguous riparian areas, typically near streambeds or other bodies of water. | None. No suitable nesting habitat present on site. |
| MAMMALS | | | |
| Los Angeles pocket mouse (*Perognathus longimembris brevinasus*) | SSC | Found in low elevation grassland, alluvial sage scrub, and coastal sage scrub on sandy soils. | Low. Scrub habitat on site does not occur on sandy soils suitable for this species. |
| Pocketed free-tailed bat (*Nyctinomops femorosaccus*) | SSC | Rugged cliffs, rocky outcrops, and slopes in desert scrub and pinyon-juniper woodlands | None. No suitable habitat present on site. |
| FE: Federally Endangered under the ESA<br>FT: Federally Threatened under the ESA<br>SE: State Endangered under CESA<br>SSC: CDFW Species of Special Concern | | | |

#### 3.4.2.1 Threatened and Endangered Wildlife Species

Although no focused wildlife surveys were conducted, no federally or state-listed as threatened or endangered wildlife species were observed during the general field survey.

#### Delhi Sands Flower-loving Fly

The DSFLF is a federally endangered species under the ESA. It is one of are more than 30 species of *Rhaphiomidas* distributed across the southwestern United States and northern Mexico. As with all species of *Rhaphiomidas*, DSFLF are associated with arid, sandy habitats. It is only found in the

Colton Dunes of San Bernardino and Riverside Counties (Kingsley 2002), with most occupied DSFLF habitat located within a limited area of southwestern San Bernardino County (USFWS 2018). The life history of the DSFLF is largely unknown, but the loose, sandy soils of the Delhi Sands appear to be required for oviposition. Larval stages develop completely underground and may remain subterranean for several years to emerge as adults in the summer. It is unknown what neonatal and larval flies eat or what subterranean conditions are required. Adults are most active during the warmest, sunniest parts of the day, and both males and females likely extract nectar from *Eriogonum fasciculatum* and other plants (Kingsley 1996).

Though habitat loss is still the primary threat to the fly, the primary causes for the loss have shifted from degrading lands to a more permanent loss due to urban development. There are still various soil-disturbing activities (i.e., disking, agriculture, development, off-road vehicles, dumping) causing degradation of DSFLF habitat as well as direct mortality of eggs, larvae, and pupae.

Delhi fine sands were historically mapped within the project site and DSFLF has been documented within one mile of the project site. However, the mapped Delhi fine sands in the southwestern section of the project site have been impacted by previous grading, the dumping of fill dirt, and trash, and the increase of non-native grasses and other invasive species. On February 13, 2024, RBC senior biologist Ian Hirschler and Amanda Swaller of the USFWS conducted a follow-up habitat assessment of the previously mapped Delhi fine sands on site. On February 23, 2024, the USFWS provided concurrence with RBC's assessment that there is no suitable habitat on site for DSFLF (Appendix D), and as such the species has no potential to occur on site.

#### 3.4.2.2 Other Special-Status Wildlife Species

This section presents information about non-listed special-status wildlife species, including CDFW Species of Special Concern (SSC) that may occur in the survey area or are present in the survey area.

*Burrowing Owl*

BUOW is a CDFW SSC at nesting sites and is federally protected by the MBTA. The western subspecies of burrowing owl (*A. c. hypugaea*) breeds from southern Canada to the western half of the United States and into Baja California and central Mexico. In California, suitable habitat for burrowing owl is generally characterized by short, sparse vegetation with few shrubs, level to gentle topography, and well-drained soils, such as naturally occurring grassland, shrub steppe, and desert habitats (Haug et al. 1993). BUOW may also occur in agricultural areas, ruderal grassy fields, vacant lots, and pastures containing suitable vegetation structure and useable burrows with foraging habitat in proximity (Gervais et al. 2008). BUOW usually use burrows dug by California ground squirrel (*Otospermophilus beecheyi*) and round-tailed ground squirrel (*Citellus tereticaudus*) and dens or holes dug by other fossorial species including badger (*Taxidea taxus*), coyote (*Canis latrans*), and fox (e.g., San Joaquin kit fox [*Vulpes macrotis mutica*]) (Ronan 2002). BUOW also frequently use natural rock cavities, debris piles, culverts, and pipes for nesting and roosting (Rosenberg et al. 2004) and have been documented using artificial burrows for nesting and cover (Smith and Belthoff 2001).

BUOW have declined throughout much of their range because of habitat loss due to urbanization, agricultural conversion, and destruction of ground squirrel colonies (Remsen 1978). The incidental poisoning of BUOW and the destruction of their burrows during eradication programs aimed at rodent colonies have also caused their decline (Collins 1979; Remsen 1978). Although BUOW are relatively tolerant of lower levels of human activity, human-related impacts such as shooting, and introduction of non-native predators have negative population impacts. BUOW often nest and perch near roads where they are vulnerable to roadside shooting, fatal car strikes, and general harassment (Remsen 1978).

No BUOW or sign were documented in the survey area during the general biological survey and no California ground squirrels were documented on site. However, multiple burrows/debris piles suitable for BUOW were observed throughout the survey that did not appear to be active but have the potential to support BUOW; therefore, BUOW has a low to moderate potential to occur on site.

#### 3.4.2.3 Critical Habitat

The ESA defines critical habitat as a specific geographic area, or areas, that contains features essential for the survival and recovery of endangered and threatened species. USFWS designates critical habitat for endangered and threatened species and may include sites for breeding and rearing, movement or migration, feeding, roosting, cover, and shelter. Critical habitat may also include areas that are not currently occupied by the species, but that will be needed for its recovery. Special management of critical habitat, including measures for water quality and quantity, host animals and plants, food availability, pollinators, sunlight, and specific soil types is required to ensure the long-term survival and recovery of the identified species.

Although critical habitat for CAGN, Santa Ana sucker, and southwestern willow flycatcher occurs within one mile of the project site (USFWS 2022a), no USFWS-designated critical habitat or proposed critical habitat occurs on site.

## 3.5 WILDLIFE CORRIDORS

The project site does not occur within an Essential Connectivity Area, as mapped through the CEHC Project (CDFW 2022b; Figure 5). Additionally, as previously mentioned, the project site is surrounded by industrial and manufacturing land uses on all sides. These existing land uses prevent any significant wildlife movement across the project site. Although the project site supports isolated native vegetation communities and undeveloped land, the project site does not serve as a wildlife corridor due to the lack of regional connectivity to adjacent wildlife habitats.

# 4 Impact Analysis

Direct impacts are caused by the project and occur at the same time and place as the project. Any alteration, disturbance, or destruction of biological resources that would result from project-related activities is considered a direct impact. Direct impacts would include direct losses to native habitats, potential jurisdictional waters, wetlands, and special-status species; and diverting natural surface water flows. Direct impacts could include injury, death, and/or harassment of listed and/or special-status species. Direct impacts could also include the destruction of habitats necessary for species breeding, feeding, or sheltering. Direct impacts on plants can include crushing of adult plants, bulbs, or seeds.

Indirect impacts can result from project-related activities where biological resources are affected in a manner that is not direct. Indirect impacts may occur later in time or at a place that is farther removed in distance from the project than direct impacts, but indirect impacts are still reasonably foreseeable and attributable to project-related activities. Examples include habitat fragmentation; elevated noise, dust, and lighting levels; changes in hydrology, runoff, and sedimentation; decreased water quality; soil compaction; increased human activity; and the introduction of invasive wildlife (domestic cats and dogs) and plants. As noted in Section 2, the project survey area included a 100-foot buffer to identify nearby biological resources and to aid in assessment of potential indirect impacts on protected resources, if present.

Cumulative impacts refer to incremental individual environmental effects of two or more projects when considered together. Such impacts taken individually may be minor but are collectively significant in light of regional impacts.

The significance thresholds as outlined in Appendix G of the state CEQA Guidelines (CCR Title 14, Division 6, Chapter 3, Sections 15000–15387) have been used to determine whether project implementation would result in a significant direct, indirect, and/or cumulative impact. A significant biological resources impact would occur if the project would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS;
- Have a substantial adverse effect on federal protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marshes, vernal pools, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy, or ordinance;

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

## 4.1 VEGETATION IMPACTS

The proposed project will impact 42.4 acres of vegetation communities/land covers. The proposed project will primarily result in impacts on non-native grassland, disturbed habitat, and developed land although smaller impacts will occur on developed habitat and disturbed brittle bush scrub (Table 7, Figure 6). Brittle bush scrub, California sagebrush – (purple sage) scrub and their disturbed counterparts, as well as mulefat thickets are not considered sensitive vegetation communities by CDFW. These native vegetation communities are small and isolated within the project site, preventing them from providing any substantial biological value within the project area. Therefore, impacts on native vegetation communities resulting from the project would be less than significant.

As previously mentioned, disturbed Delhi fine sands, which may be suitable for DSFLF, occur within the southwestern portion of the project site in areas mapped as disturbed, upland mustards or star thistle fields, California sagebrush – (purple sage) scrub – disturbed, mulefat thickets, and tamarisk thickets. Impacts on these vegetation communities where they occur on Delhi fine sands have the potential to impact DSFLF; impacts on this species is addressed below in section 4.4.

Table 3. Santa Ana Terminal Project Vegetation Communities/Land Cover Project Impacts

| Vegetation (Holland)[1] | Vegetation[2] | Global/ State Rank | Impacts (acres) |
|---|---|---|---|
| Developed | Developed/Disturbed | No Rank | 8.7 |
| Disturbed Habitat | Developed/Disturbed | No Rank | 9.7 |
| Mulefat Scrub | Mulefat Thickets | G5/S5 | 0.1 |
| Non-native grassland | Upland Mustards or Star Thistle Fields | No Rank | 16.9 |
| Riversidian Sage Scrub | Brittle Bush Scrub | G5/S4 | 0.6 |
| Riversidian Sage Scrub – Disturbed | Brittle Bush Scrub - Disturbed | G5/S4 | 2.1 |
| Riversidian Upland Sage Scrub | California Sagebrush – (Purple Sage) Scrub | G5/S5 | 0.3 |
| Riversidian Upland Sage Scrub - Disturbed | California Sagebrush – (Purple Sage) Scrub - Disturbed | G5/S5 | 2.3 |
| Tamarisk Scrub | Tamarisk Thickets | No Rank | 1.7 |
| Total | | | 42.4 |

[1] Vegetation communities recognized by Holland (1986)

[2] Vegetation crosswalked to MCV2 (Sawyer et al. 2009)

## 4.2 POTENTIAL JURISDICTIONAL AQUATIC RESOURCES IMPACTS

The proposed project is not expected to impact jurisdictional aquatic resources as such features were not documented on site (See Section 3.3). Therefore, permitting through the Corps, RWQCB, and CDFW is not expected to be required for the proposed project. A formal, project-specific ARDR per Corps' standards and guidelines and further coordination with the Corps, RWQCB, and CDFW would be required to receive an official determination from the Corps and concurrence from the RWQCB and CDFW related to potential aquatic resources on site (i.e., that the project site does not support jurisdictional aquatic resources). Assuming the on-site erosional features are non-jurisdictional per our analysis, no impacts on jurisdictional aquatic resources would occur with project implementation.

## 4.3 IMPACTS ON SPECIAL-STATUS PLANTS

No special-status plant species, including federally and/or state-listed and CRPR 1 or 2 plant species, were observed within the project site and none have a moderate or high potential to occur. Therefore, impacts on special-status plant species are not anticipated.

## 4.4 IMPACTS ON SPECIAL-STATUS WILDLIFE

### Threatened and Endangered Wildlife Species

*Delhi Sands Flower-Loving Fly*

Due to the heavily disturbed nature of the previously mapped Delhi fine sands on site, DSFLF has no potential to occur within the project site. Therefore, impacts on DSFLF are not anticipated.

### Other Special-Status Wildlife Species

*Burrowing Owl*

The project has low to moderate potential to support BUOW. With project implementation, direct impacts on burrowing owl could occur in the form of habitat destruction, and potentially death, injury, or harassment of nesting BUOW, their eggs, and their young. Injury or mortality occurs most frequently during the vegetation clearing stage of construction and affects eggs, nestlings, and recently fledged young that cannot safely avoid equipment. Pre-construction surveys would be required to avoid potential impacts on this species. Therefore, with the adherence of avoidance and minimization measures as discussed in Section 5, impacts on BUOW resulting from the project would be less than significant.

## 4.5 NESTING BIRD IMPACTS

The project site has potential to support avian nests, which would be protected under the MBTA and/or CFGC §3503, which provides that it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs. Thus, potential impacts could occur if vegetation clearing is undertaken during the breeding season. Removal of habitat would occur outside of the breeding season (generally February 1 to September 15). If vegetation removal cannot occur outside of the breeding season, a qualified biologist would survey the area of impact prior to initial disturbance. If active nests are

found, the project clearing in that area plus an appropriate buffer (determined by the qualified biologist in consultation with CDFW) would be delayed until nestlings have fledged. Please refer to Section 5.3 (AMMM-3) for full nest protection requirements.

## 4.6 WILDLIFE CORRIDOR IMPACTS

Due to the lack of regional connectivity to adjacent wildlife habitats, the project area does not serve as a wildlife corridor; therefore, the project would not result in significant impacts on wildlife corridors.

## 4.7 LOCAL POLICIES & ORDINANCES IMPACTS

### County of San Bernardino Burrowing Owl Overlay Zone

As previously discussed, the project site is within the Burrowing Owl Overlay Zone. As such, pre-construction surveys for BUOW should be conducted to determine presence/absence within the project site, as detailed in Section 5. With the adherence of AMMM proposed, impacts on burrowing owl would be avoided and/or minimized.

## 4.8 HABITAT CONSERVATION PLAN; NATURAL COMMUNITY CONSERVATION PLAN; OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN IMPACTS

The project site is not located with an active HCP or NCCP plan area; therefore, the project would not conflict with any existing HCPs or NCCPs.

## 4.9 CUMULATIVE IMPACTS

Due to the level of disturbance at the project site, adjacent development, and general lack of sensitive biological resources, the project would not result in any significant cumulative impacts on biological resources.

# 5 Avoidance, Minimization, and Mitigation Measures

The following discussion provides project-specific avoidance, minimization, and mitigation measures (AMMM) for potential impacts on biological resources.

## 5.1 BURROWING OWL

BUOW was not observed during the 2021 general biological surveys, but has the potential to inhabit the site. As such, pre-construction surveys will be required.

AMMM-1A: Prior to the initiation of construction activities, a qualified biologist shall conduct pre-construction surveys for BUOW within suitable habitat to determine presence/absence of the species. The survey shall be conducted in accordance with the most current CDFW protocol within 30 days of site disturbance to determine whether the burrowing owl is present at the site. Pre-construction surveys shall include suitable BUOW habitat within the project footprint and within 500 feet of the project footprint (or within an appropriate buffer as required in the most recent guidelines and where legal access to conduct the survey exists). If BUOW are not detected during the clearance survey, no additional mitigation is required.

If BUOW is located, occupied BUOW burrows shall not be disturbed during the nesting season (February 1 through August 31) unless a qualified biologist approved by CDFW verifies through non-invasive methods that either the birds have not begun egg laying and incubation or that juveniles from the occurred burrows are foraging independently and capable of independent survival. A 500-foot non-disturbance buffer (where no work activities may be conducted) shall be maintained between project activities and nesting BUOW during the nesting season, unless otherwise authorized by CDFW.

If BUOW is detected during the non-breeding season (September 1 through January 31) or confirmed to not be nesting, a 160-foot non-disturbance buffer shall be maintained between the project activities and occupied burrow(s). Alternatively, a Burrowing Owl Relocation Plan may be prepared and submitted for approval by CDFW. Once approved, the Relocation Plan would be implemented to relocate non-breeding BUOW from the project site. The Relocation Plan shall detail methods and guidance for passive relocation of BUOW from the project site, provide monitoring and management of the replacement burrow sites reporting requirements, and ensure that a minimum of two suitable, unoccupied burrows are available off site for every burrowing owl or pair of burrowing owls to be passively relocated. Compensatory mitigation of habitat would be required if occupied burrows or territories occur within the permanent impact footprint. Ratios typically include a minimum of 19.5 acres per nesting burrow lost; however, habitat compensation shall be approved by CDFW and detailed in the Relocation Plan.

AMMM-1B: If avoidance is not possible, either directly or indirectly, a Burrowing Owl Relocation and Mitigation Plan (Plan) shall be prepared and submitted for approval by CDFW. Once approved, the Plan would be implemented to relocate non-breeding burrowing owls from the project site. The Plan shall detail methods for passive relocation of BUOW from the project site, provide guidance for the monitoring and management of the replacement burrow sites and associated reporting requirements, and ensure that a minimum of two suitable, unoccupied burrows are available off site for every BUOW or pair of burrowing owls to be passively relocated. Compensatory mitigation of habitat would be required if occupied burrows or territories occur within the permanent impact footprint. Habitat compensation shall be approved by CDFW and detailed in the Burrowing Owl Relocation and Mitigation Plan.

## 5.2 NESTING BIRD

The project site supports suitable habitat for nesting birds. As such, the following mitigation is required to reduce impacts on nesting birds:

AMMM-2: To avoid direct impacts on raptors and/or native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (generally February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds in the proposed area of disturbance. The pre-construction survey shall be conducted within ten (10) calendar days prior to the start of construction activities (including removal of vegetation). If nesting birds are observed, a letter report or mitigation plan in conformance with applicable state and federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction, and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the CDFW and/or USFWS, as applicable, for review and approval and implemented to the satisfaction of those agencies. The project biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the pre-construction survey, no further mitigation is required.

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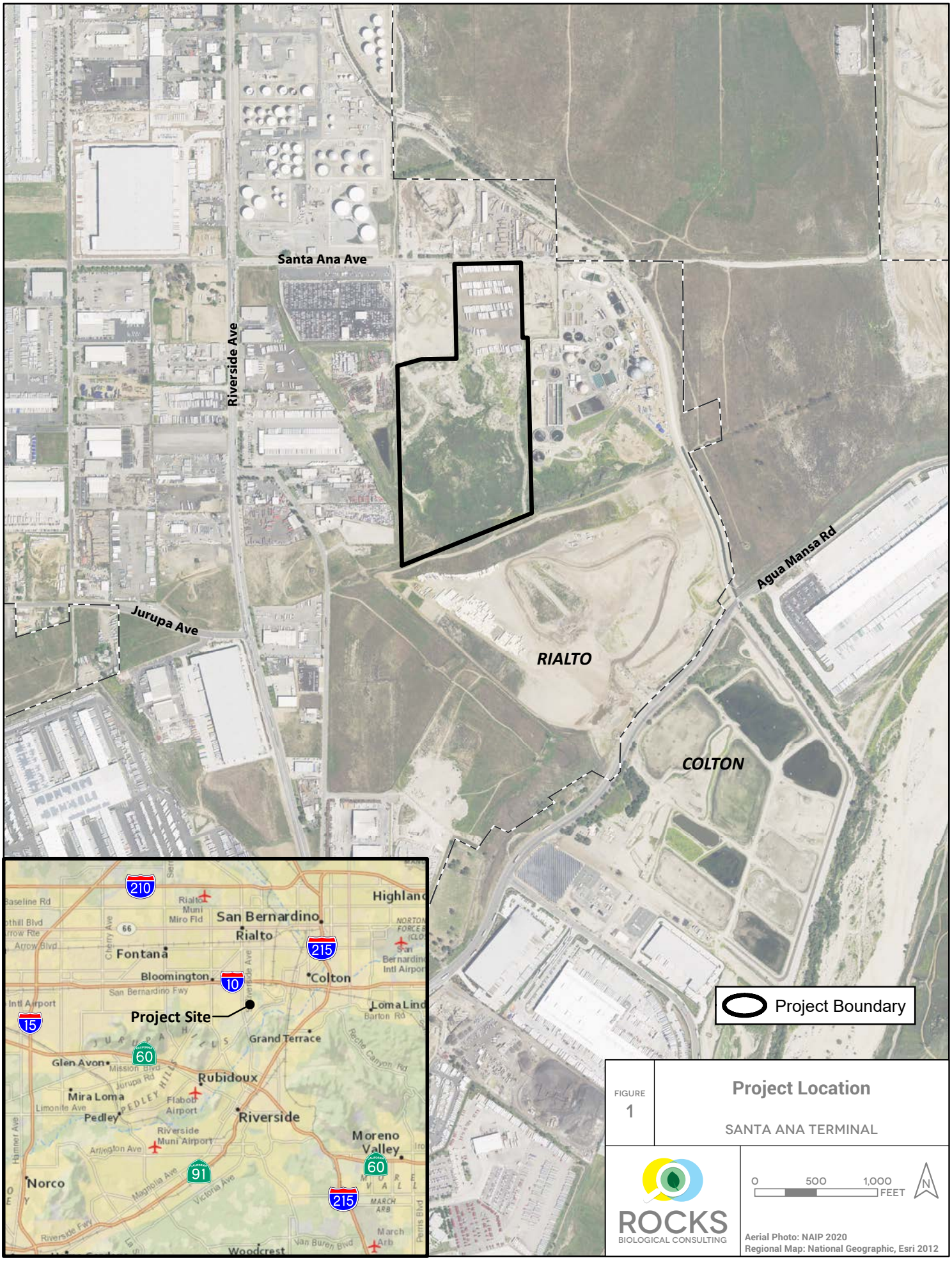



FIGURE 1

## Project Location

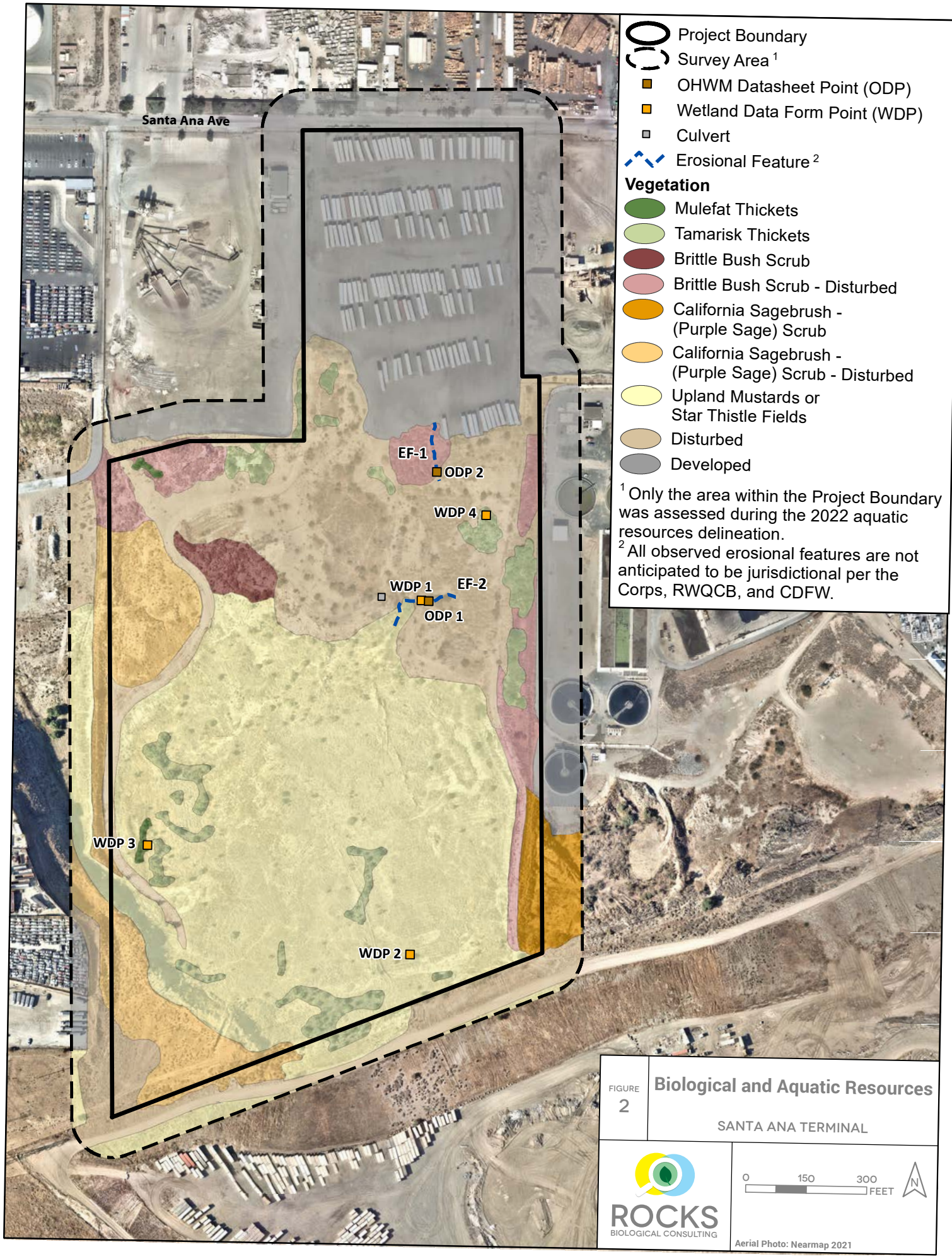
SANTA ANA TERMINAL

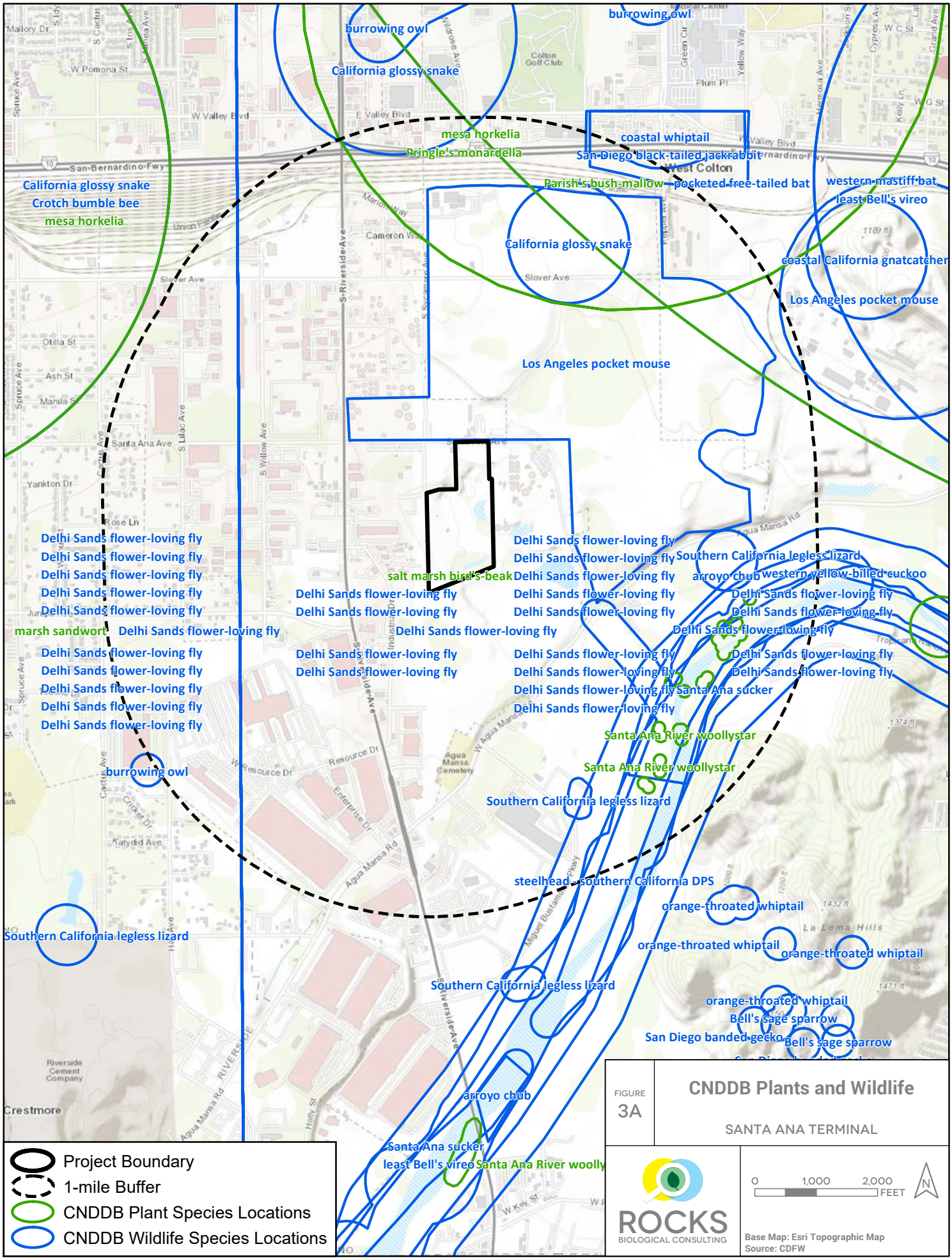
ROCKS BIOLOGICAL CONSULTING

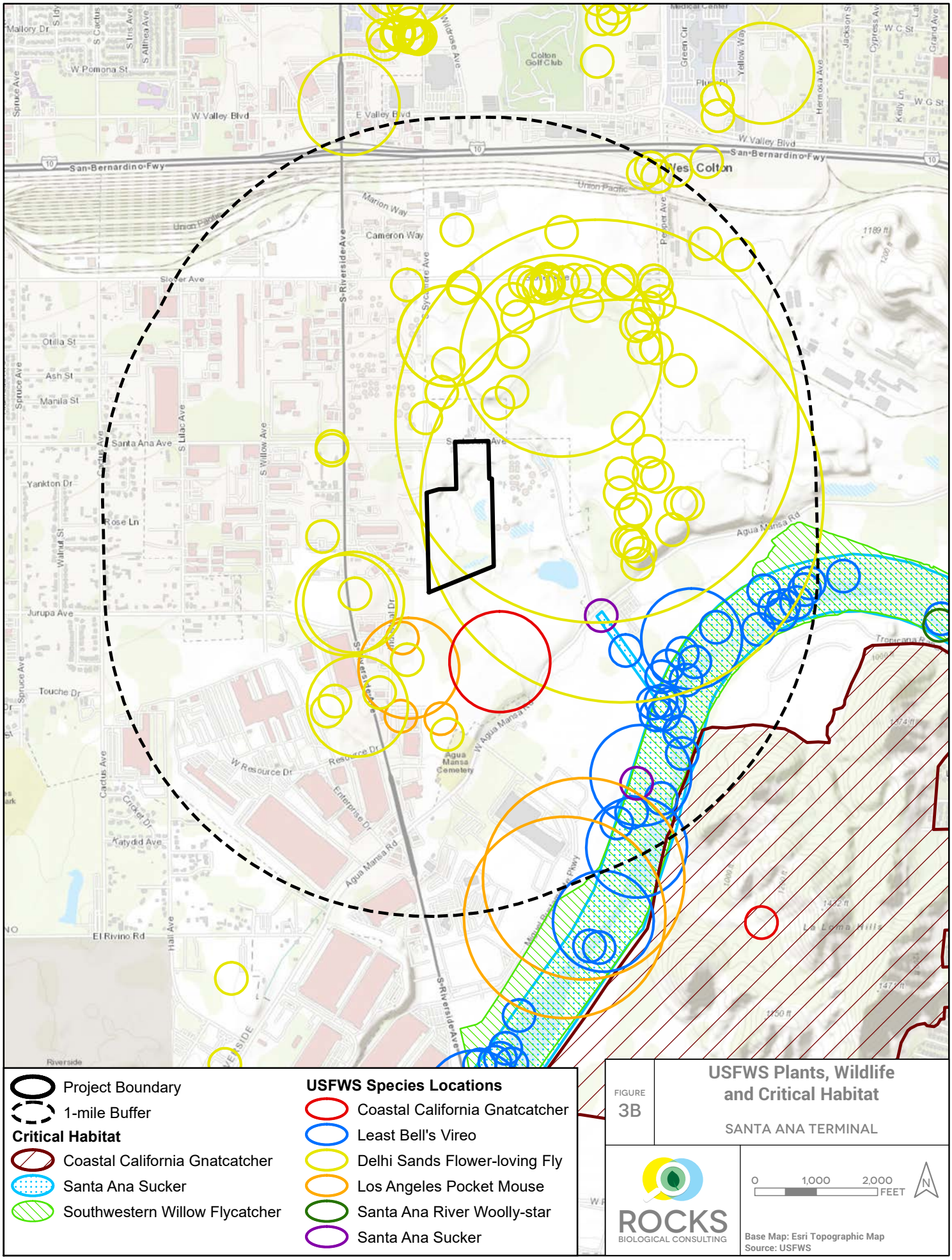
0 500 1,000 FEET

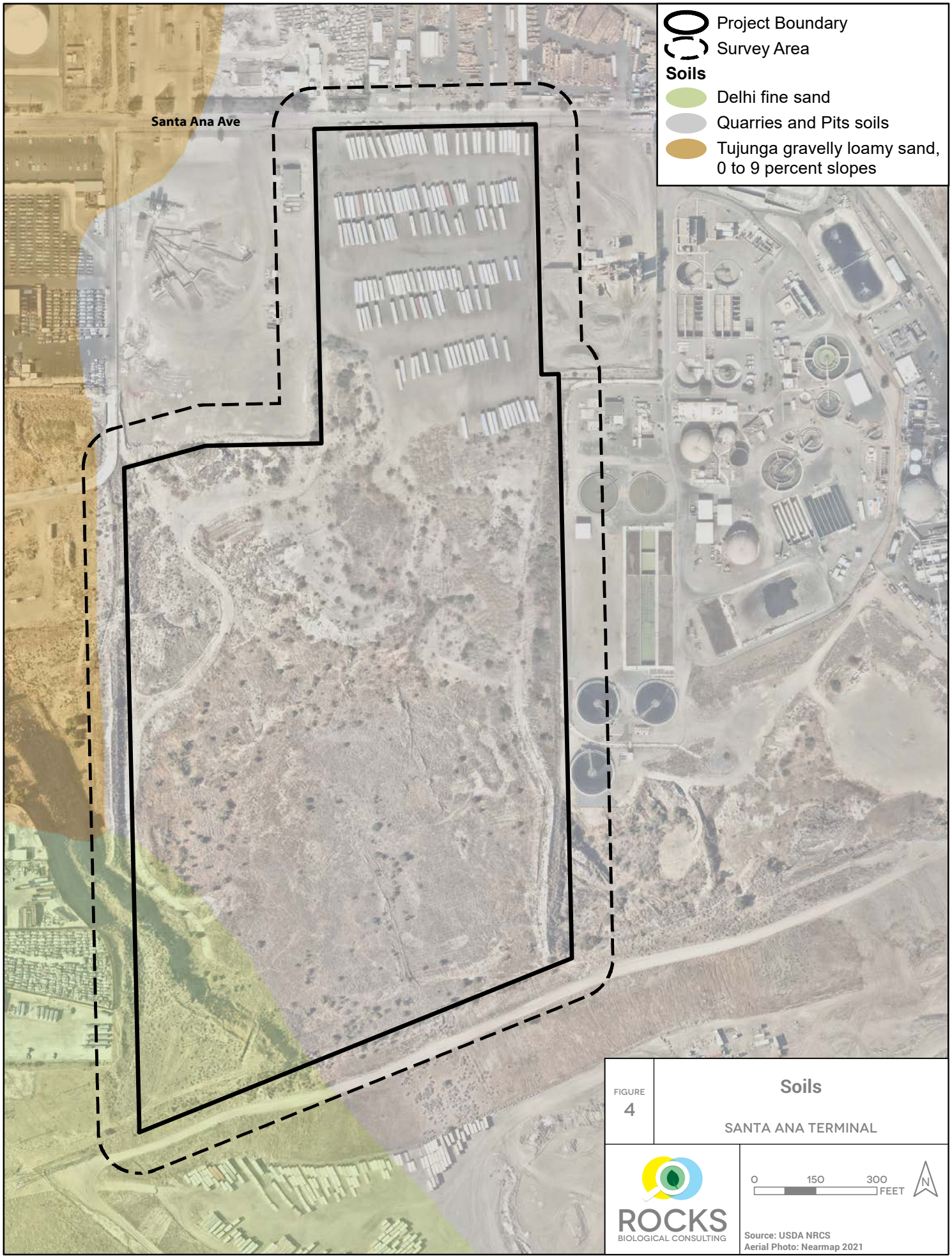
N

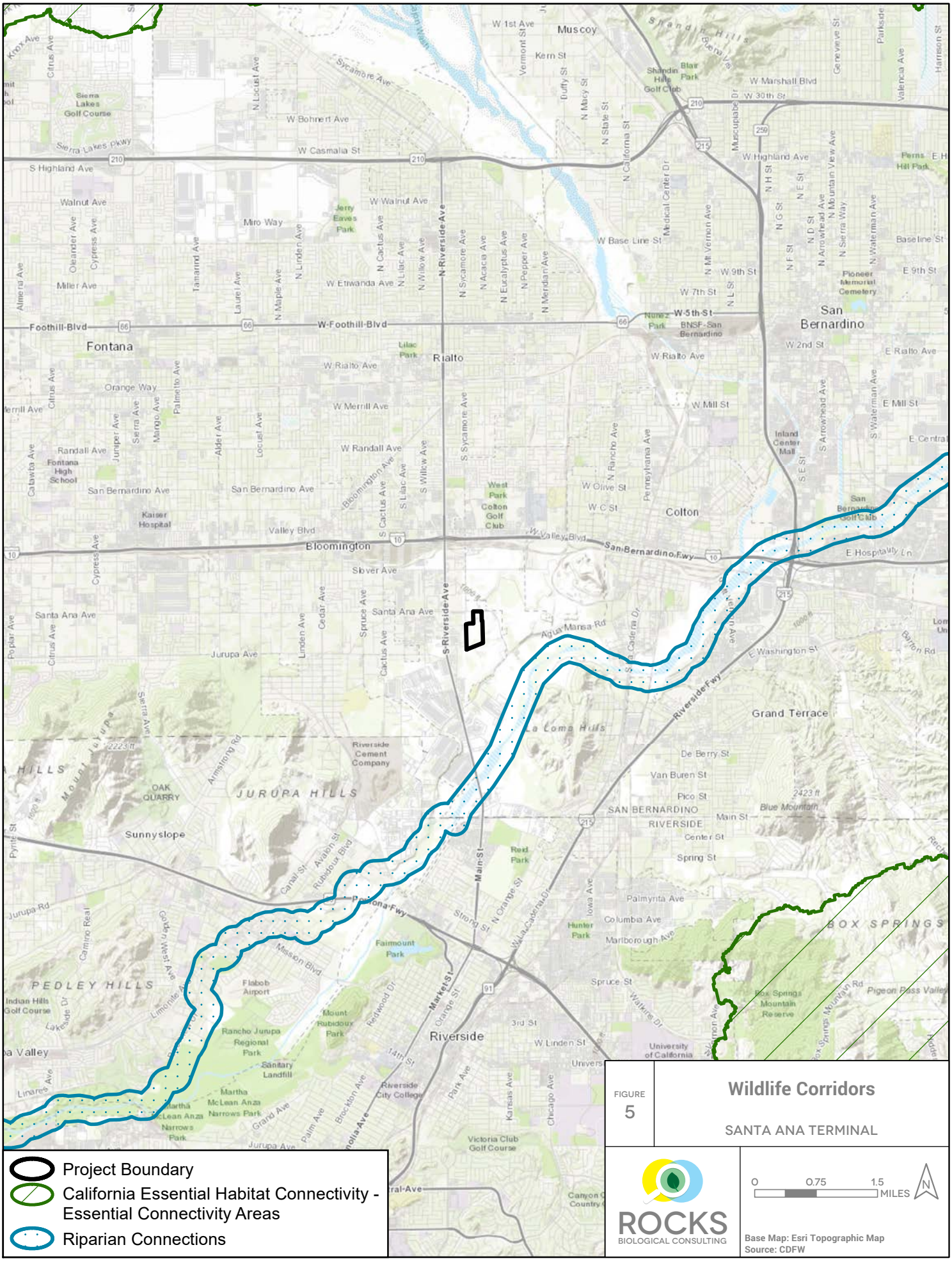
Aerial Photo: NAIP 2020
Regional Map: National Geographic, Esri 2012

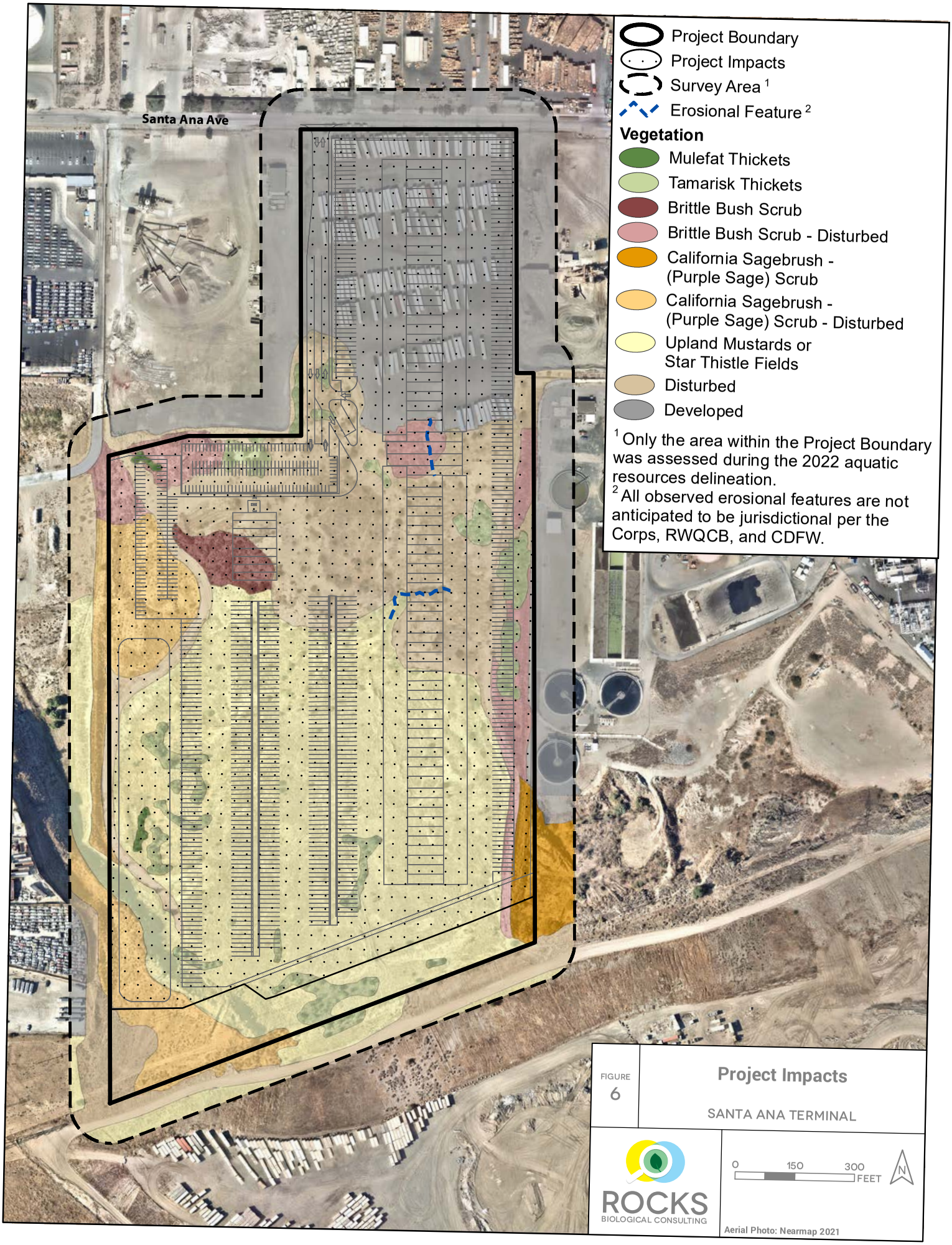

Santa Ana Ave
EF-1
ODP 2
WDP 4
WDP 1
EF-2
ODP 1
WDP 3
WDP 2
Project Boundary
Survey Area [1]
OHWM Datasheet Point (ODP)
Wetland Data Form Point (WDP)
Culvert
Erosional Feature [2]
Vegetation
Mulefat Thickets
Tamarisk Thickets
Brittle Bush Scrub
Brittle Bush Scrub - Disturbed
California Sagebrush - (Purple Sage) Scrub
California Sagebrush - (Purple Sage) Scrub - Disturbed
Upland Mustards or Star Thistle Fields
Disturbed
Developed
[1] Only the area within the Project Boundary was assessed during the 2022 aquatic resources delineation.
[2] All observed erosional features are not anticipated to be jurisdictional per the Corps, RWQCB, and CDFW.
FIGURE 2
Biological and Aquatic Resources
SANTA ANA TERMINAL
ROCKS BIOLOGICAL CONSULTING
0 150 300 FEET
N
Aerial Photo: Nearmap 2021


burrowing owl
California glossy snake
mesa horkelia
Pringle's monardella
coastal whiptail
San Diego black-tailed jackrabbit
Parish's bush-mallow
pocketed free-tailed bat
western mastiff-bat
least Bell's vireo
California glossy snake
Crotch bumble bee
mesa horkelia
coastal California gnatcatcher
Los Angeles pocket mouse
Delhi Sands flower-loving fly
salt marsh bird's-beak
Southern California legless lizard
arroyo chub
western yellow-billed cuckoo
marsh sandwort
Santa Ana sucker
Santa Ana River woollystar
steelhead - southern California DPS
orange-throated whiptail
Bell's sage sparrow
San Diego banded gecko
Project Boundary
1-mile Buffer
CNDDB Plant Species Locations
CNDDB Wildlife Species Locations
FIGURE 3A
CNDDB Plants and Wildlife
SANTA ANA TERMINAL
ROCKS BIOLOGICAL CONSULTING
0 1,000 2,000 FEET
Base Map: Esri Topographic Map
Source: CDFW


Project Boundary
1-mile Buffer
Critical Habitat
Coastal California Gnatcatcher
Santa Ana Sucker
Southwestern Willow Flycatcher
USFWS Species Locations
Coastal California Gnatcatcher
Least Bell's Vireo
Delhi Sands Flower-loving Fly
Los Angeles Pocket Mouse
Santa Ana River Woolly-star
Santa Ana Sucker
FIGURE
3B
USFWS Plants, Wildlife and Critical Habitat
SANTA ANA TERMINAL
ROCKS
BIOLOGICAL CONSULTING
0
1,000
2,000
FEET
Base Map: Esri Topographic Map
Source: USFWS


Santa Ana Ave
Project Boundary
Survey Area
Soils
Delhi fine sand
Quarries and Pits soils
Tujunga gravelly loamy sand, 0 to 9 percent slopes
FIGURE 4
Soils
SANTA ANA TERMINAL
ROCKS BIOLOGICAL CONSULTING
0 150 300 FEET
N
Source: USDA NRCS
Aerial Photo: Nearmap 2021


Project Boundary
California Essential Habitat Connectivity - Essential Connectivity Areas
Riparian Connections
FIGURE 5
Wildlife Corridors
SANTA ANA TERMINAL
ROCKS BIOLOGICAL CONSULTING
0 0.75 1.5 MILES
N
Base Map: Esri Topographic Map
Source: CDFW


Santa Ana Ave
Project Boundary
Project Impacts
Survey Area [1]
Erosional Feature [2]
Vegetation
Mulefat Thickets
Tamarisk Thickets
Brittle Bush Scrub
Brittle Bush Scrub - Disturbed
California Sagebrush - (Purple Sage) Scrub
California Sagebrush - (Purple Sage) Scrub - Disturbed
Upland Mustards or Star Thistle Fields
Disturbed
Developed
[1] Only the area within the Project Boundary was assessed during the 2022 aquatic resources delineation.
[2] All observed erosional features are not anticipated to be jurisdictional per the Corps, RWQCB, and CDFW.
FIGURE 6
Project Impacts
SANTA ANA TERMINAL
ROCKS BIOLOGICAL CONSULTING
0 150 300 FEET
N
Aerial Photo: Nearmap 2021

# APPENDIX A

# SITE PHOTOGRAPHS

Appendix A

Site Photographs


Photo 1. View of developed area facing east from the northeast portion of the project site. October 14, 2021.

Photo 2. View of disturbed brittlebush (*Encelia farinosa*) scrub and tamarisk thickets facing northeast from the northwest corner of the project site. October 14, 2021.

Photo 3. View of cracked soils in the northwestern portion of the project site, facing southeast. October 14, 2021.

Photo 4. View of disturbed Riversidean sage scrub habitat, facing southwest from the northwest corner of the project site. October 14, 2021.

Photo 5. Representative view of the upland mustard habitat with scattered tamarisk throughout the site, facing northeast from the southern portion of the project boundary. October 14, 2021.

Photo 6. View of single Goodding's black willow (*Salix gooddingii*), facing west from the southern portion of the project site. November 2, 2022.

Photo 7. View of disturbed habitat consisting of soil piles in the eastern portion of the project site, facing northwest. October 14, 2021.

Photo 8. View of disturbed habitat consisting of stinkwort (*Dittrichia graveolens*), facing northeast from the eastern portion of the project site. October 14, 2021.

Photo 9. View of area mapped as Delhi fine sands in the southwestern corner of the project site. October 14, 2021.


Photo 10. View of Erosional Feature (EF-) 1 within disturbed habitat, facing north just south of paved truck lot in northern portion of the project site. November 2, 2022.

Photo 11. View of EF-2 within disturbed habitat, facing west near the center of the project site. November 2, 2022.

Photo 12. View of area mapped as hydric soils (i.e., Quarries and Pit soils) but dominated by upland plant species, facing northwest near the southwestern corner of the project site. November 2, 2022.

# APPENDIX B

# PLANT AND WILDLIFE SPECIES OBSERVED

# Appendix B

## Plant and Wildlife Species Observed

| Family | Common Name | Scientific Name |
|---|---|---|
| Plants | | |
| Anacardiaceae | Peruvian pepper tree* | *Schinus molle* |
| Asteraceae | annual bur-sage | *Ambrosia acanthicarpa* |
| Asteraceae | brittlebush | *Encelia farinosa* |
| Asteraceae | coastal sagebrush | *Artemisia californica* |
| Asteraceae | mule fat | *Baccharis salicifolia* |
| Asteraceae | stinknet* | *Oncosiphon piluliferum* |
| Asteraceae | stinkwort* | *Dittrichia graveolens* |
| Asteraceae | telegraph weed | *Heterotheca grandiflora* |
| Asteraceae | tocalote* | *Centaurea melitensis* |
| Asteraceae | western sunflower | *Helianthus annuus* |
| Brassicaceae | short-pod mustard* | *Hirschfeldia incana* |
| Euphorbiaceae | California croton | *Croton californicus* |
| Euphorbiaceae | castor bean* | *Ricinus communis* |
| Euphorbiaceae | doveweed | *Croton setiger* |
| Fabaceae | white sweetclover* | *Melilotus albus* |
| Lamiaceae | horehound* | *Marrubium vulgare* |
| Poaceae | red brome* | *Bromus rubens* |
| Poaceae | ripgut grass* | *Bromus diandrus* |
| Polygonaceae | California buckwheat | *Eriogonum fasciculatum* |
| Salicaceae | Goodding's black willow | *Salix gooddingii* |
| Solanaceae | tree tobacco* | *Nicotiana glauca* |
| Tamaricaceae | Saltcedar* | *Tamarix rammossissima* |
| Reptiles | | |
| Phrynosomatidae | common side-blotched lizard | *Uta stansburiana* |
| Birds | | |
| Accipitridae | red-tailed hawk | *Buteo jamaicensis* |
| Aegithalidae | bushtit | *Psaltriparus minimus* |
| Charadriidae | killdeer | *Charadrius vociferus* |
| Columbidae | mourning dove | *Zenaida macroura* |
| Corvidae | American crow | *Corvus brachyrhynchos* |
| Corvidae | common raven | *Corvus corax* |
| Fringillidae | house finch | *Haemorhous mexicanus* |
| Fringillidae | lesser goldfinch | *Spinus psaltria* |

# Appendix B

## Plant and Wildlife Species Observed

| Family | Common Name | Scientific Name |
|---|---|---|
| Mimidae | northern mockingbird | *Mimus polyglottos* |
| Parulidae | black-throated gray warbler | *Setophaga nigrescens* |
| Parulidae | yellow-rumped warbler | *Setophaga coronata* |
| Polioptilidae | blue-gray gnatcatcher | *Polioptila caerulea* |
| Trochilidae | Anna's hummingbird | *Calypte anna* |
| Troglodytidae | Bewick's wren | *Thryomanes bewickii* |
| Tyrannidae | Cassin's kingbird | *Tyrannus vociferans* |
| Mammals | | |
| Canidae | coyote | *Canis latrans* |
| Leporidae | desert cottontail | *Sylvilagus audubonii* |
| *: Non-native species | | |

# APPENDIX C

# SANTA ANA TERMINAL PROJECT AQUATIC RESOURCES DELINEATION DATA SHEETS

# WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Santa Ana Truck Terminal City/County: Bloomington/San Bernardino County Sampling Date: 11/02/2022

Applicant/Owner: Kimley-Horn State: CA Sampling Point: WDP 1

Investigator(s): Kelsey Woldt, Sarah Krejca Section, Township, Range: S25, T01S, R05W

Landform (hillslope, terrace, etc.): within erosional feature Local relief (concave, convex, none): Slightly concave Slope (%): 1-3%

Subregion (LRR): LRR C - Mediterranean California Lat: 34.052676 Long: -117.363251 Datum: WGS 84

Soil Map Unit Name: Quarries & Pits soils NWI classification: Freshwater pond (PUS)

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ✔ (If no, explain in Remarks.)

Are Vegetation ____, Soil ✔, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✔ No ____

Are Vegetation ____, Soil ____, or Hydrology ✔ naturally problematic? (If needed, explain any answers in Remarks.)

## SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

| | | | |
|---|---|---|---|
| Hydrophytic Vegetation Present? | Yes ✔ | No ____ | **Is the Sampled Area within a Wetland?** Yes ____ No ✔ |
| Hydric Soil Present? | Yes ____ | No ✔ | |
| Wetland Hydrology Present? | Yes ____ | No ✔ | |

Remarks:

Sample point taken within erosional feature within highly disturbed site that contains piles of fill and is surrounded by developed/industrial areas. Soil considered significantly disturbed as compact soils/fill material was present starting at a depth of 4 inches. Drought conditions per APT (i.e., atypical hydrologic conditions/naturally problematic); however, data collected immediately following a precipitation event (0.23 inch of precipitation on 11/02/2022 per the AgACIS Ontario International Airport station).

## VEGETATION – Use scientific names of plants.

| Tree Stratum (Plot size: 15-foot linear plot) | Absolute % Cover | Dominant Species? | Indicator Status |
|---|---|---|---|
| 1. Tamarix ramosissima | 15% | Yes | FAC |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| | 15% = Total Cover | | |
| **Sapling/Shrub Stratum (Plot size: 5-foot linear plot)** | | | |
| 1. Baccharis salicifolia | 5% | Yes | FAC |
| 2. Nicotiana glauca | 4% | Yes | FAC |
| 3. | | | |
| 4. | | | |
| 5. | | | |
| | 9% = Total Cover | | |
| **Herb Stratum (Plot size: 5-foot linear plot)** | | | |
| 1. Salvia columbariae | 15% | Yes | NL/UPL |
| 2. Erigeron canadensis | 2% | No | FACU |
| 3. Ricinus communis | 1% | No | FACU |
| 4. Hirschfeldia incana | 1% | No | NL/UPL |
| 5. Solanum douglasii | 1% | No | FAC |
| 6. | | | |
| 7. | | | |
| 8. | | | |
| | 20% = Total Cover | | |
| **Woody Vine Stratum (Plot size: N/A)** | | | |
| 1. | | | |
| 2. | | | |
| | N/A = Total Cover | | |

% Bare Ground in Herb Stratum 80% % Cover of Biotic Crust 0%

**Dominance Test worksheet:**

Number of Dominant Species That Are OBL, FACW, or FAC: 3 (A)

Total Number of Dominant Species Across All Strata: 4 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 75% (A/B)

**Prevalence Index worksheet:**

| Total % Cover of: | Multiply by: |
|---|---|
| OBL species ____ | x 1 = ____ |
| FACW species ____ | x 2 = ____ |
| FAC species ____ | x 3 = ____ |
| FACU species ____ | x 4 = ____ |
| UPL species ____ | x 5 = ____ |
| Column Totals: ____ (A) | ____ (B) |

Prevalence Index = B/A = ____

**Hydrophytic Vegetation Indicators:**

✔ Dominance Test is >50%

___ Prevalence Index is ≤3.0[1]

___ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Hydrophytic Vegetation Present?** Yes ✔ No ____

Remarks:

Sample point taken within area mapped as disturbed habitat. Tamarix ramosissima is synonymous with Tamarix chinensis (FAC) per the NWPL. Linear plots used to better represent vegetation growing under same soil and hydrologic conditions.

## SOIL

Sampling Point: WDP 1

**Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)**

| Depth (inches) | Matrix Color (moist) | Matrix % | Redox Features Color (moist) | Redox Features % | Type[1] | Loc[2] | Texture | Remarks |
|---|---|---|---|---|---|---|---|---|
| 0-4 | 10 YR 4/2 | 100% | N/A | N/A | N/A | N/A | Loamy sand | No evidence of redox observed |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

**Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)**

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5) (**LRR C**)
- ___ 1 cm Muck (A9) (**LRR D**)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Vernal Pools (F9)

**Indicators for Problematic Hydric Soils[3]:**

- ___ 1 cm Muck (A9) (**LRR C**)
- ___ 2 cm Muck (A10) (**LRR B**)
- ___ Reduced Vertic (F18)
- ___ Red Parent Material (TF2)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

**Restrictive Layer (if present):**

Type: Shovel refusal - likely fill/compact soils

Depth (inches): @ 4 inches

**Hydric Soil Present? Yes _____ No ✔**

Remarks:

Dry soils; soils moistened with spray bottle to record soil color. Uniform soils throughout. No hydric soil indicators observed.

## HYDROLOGY

**Wetland Hydrology Indicators:**

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1) (**Nonriverine**)
- ___ Sediment Deposits (B2) (**Nonriverine**)
- ___ Drift Deposits (B3) (**Nonriverine**)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Water-Stained Leaves (B9)
- ___ Salt Crust (B11)
- ___ Biotic Crust (B12)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water Marks (B1) (**Riverine**)
- ___ Sediment Deposits (B2) (**Riverine**)
- ___ Drift Deposits (B3) (**Riverine**)
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)

**Field Observations:**

Surface Water Present? Yes _____ No ✔ Depth (inches): N/A

Water Table Present? Yes _____ No ✔ Depth (inches): N/A

Saturation Present? (includes capillary fringe) Yes _____ No ✔ Depth (inches): N/A

**Wetland Hydrology Present? Yes _____ No ✔**

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

N/A

Remarks:

FAC-Neutral test not met. No wetland hydrology indicators observed.

# WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Santa Ana Truck Terminal City/County: Bloomington/San Bernardino County Sampling Date: 11/02/2022

Applicant/Owner: Kimley-Horn State: CA Sampling Point: WDP 2

Investigator(s): Kelsey Woldt, Sarah Krejca Section, Township, Range: S25, T01S, R05W

Landform (hillslope, terrace, etc.): flat landscape Local relief (concave, convex, none): Slightly concave Slope (%): 0-1%

Subregion (LRR): LRR C - Mediterranean California Lat: 34.050268 Long: -117.363315 Datum: WGS 84

Soil Map Unit Name: Quarries & Pits soils NWI classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes _____ No ✔ (If no, explain in Remarks.)

Are Vegetation _____, Soil ✔, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes ✔ No _____

Are Vegetation _____, Soil _____, or Hydrology ✔ naturally problematic? (If needed, explain any answers in Remarks.)

## SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

| | | | |
|---|---|---|---|
| Hydrophytic Vegetation Present? | Yes _____ | No ✔ | **Is the Sampled Area within a Wetland?** Yes _____ No ✔ |
| Hydric Soil Present? | Yes _____ | No ✔ | |
| Wetland Hydrology Present? | Yes _____ | No ✔ | |

Remarks:

Sample point taken adjacent to mature, individual Goodding's black willow (Salix gooddingii) within highly disturbed site that contains piles of fill and is surrounded by developed/industrial areas. Soil considered significantly disturbed as compact soils/fill material was present starting at a depth of 6 inches. Drought conditions per APT (i.e., atypical hydrologic conditions/naturally problematic); however, data collected immediately following a precipitation event (0.23 inch of precipitation on 11/02/2022 per the AgACIS Ontario International Airport station).

## VEGETATION – Use scientific names of plants.

| Tree Stratum (Plot size: 15-foot radius) | Absolute % Cover | Dominant Species? | Indicator Status |
|---|---|---|---|
| 1. Salix gooddingii | 30% | Yes | FACW |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| | 30% = Total Cover | | |
| **Sapling/Shrub Stratum (Plot size: N/A)** | | | |
| 1. | | | |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| 5. | | | |
| | N/A = Total Cover | | |
| **Herb Stratum (Plot size: 5-foot radius)** | | | |
| 1. Hordeum vulgare | 70% | Yes | NL/UPL |
| 2. Avena barbata | 19% | No | NL/UPL |
| 3. Amsinckia menziesii | 5% | No | NL/UPL |
| 4. Centaurea melitensis | 4% | No | NL/UPL |
| 5. Hirschfeldia incana | 2% | No | NL/UPL |
| 6. | | | |
| 7. | | | |
| 8. | | | |
| | 100% = Total Cover | | |
| **Woody Vine Stratum (Plot size: N/A)** | | | |
| 1. | | | |
| 2. | | | |
| | N/A = Total Cover | | |

% Bare Ground in Herb Stratum 0% % Cover of Biotic Crust 0%

**Dominance Test worksheet:**

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 50% (A/B)

**Prevalence Index worksheet:**

| Total % Cover of: | | Multiply by: | |
|---|---|---|---|
| OBL species | 0 | x 1 = | 0 |
| FACW species | 30 | x 2 = | 60 |
| FAC species | 0 | x 3 = | 0 |
| FACU species | 0 | x 4 = | 0 |
| UPL species | 100 | x 5 = | 500 |
| Column Totals: | 130 (A) | | 560 (B) |

Prevalence Index = B/A = 4.31

**Hydrophytic Vegetation Indicators:**

___ Dominance Test is >50%

___ Prevalence Index is ≤3.0[1]

___ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Hydrophytic Vegetation Present?** Yes _____ No ✔

Remarks:

Sample point taken within area mapped as upland mustards or star thistle fields. Fifteen-foot radius for tree stratum used to better represent vegetation growing under same soil and hydrologic conditions.

## SOIL

Sampling Point: WDP 2

**Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)**

| Depth (inches) | Matrix Color (moist) | Matrix % | Redox Features Color (moist) | Redox Features % | Type[1] | Loc[2] | Texture | Remarks |
|---|---|---|---|---|---|---|---|---|
| 0-6 | 10 YR 4/2 | 100% | N/A | N/A | N/A | N/A | Clay | No evidence of redox observed |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

**Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)**

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5) (**LRR C**)
- ___ 1 cm Muck (A9) (**LRR D**)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Vernal Pools (F9)

**Indicators for Problematic Hydric Soils[3]:**

- ___ 1 cm Muck (A9) (**LRR C**)
- ___ 2 cm Muck (A10) (**LRR B**)
- ___ Reduced Vertic (F18)
- ___ Red Parent Material (TF2)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

**Restrictive Layer (if present):**

Type: Shovel refusal - likely fill/compact soils

Depth (inches): @ 6 inches

**Hydric Soil Present? Yes _____ No ✔**

Remarks:

Dry soils; soils moistened with spray bottle to record soil color. Uniform soils throughout. No hydric soil indicators observed.

## HYDROLOGY

**Wetland Hydrology Indicators:**

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1) (**Nonriverine**)
- ___ Sediment Deposits (B2) (**Nonriverine**)
- ___ Drift Deposits (B3) (**Nonriverine**)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Water-Stained Leaves (B9)
- ___ Salt Crust (B11)
- ___ Biotic Crust (B12)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water Marks (B1) (**Riverine**)
- ___ Sediment Deposits (B2) (**Riverine**)
- ___ Drift Deposits (B3) (**Riverine**)
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)

**Field Observations:**

Surface Water Present? Yes _____ No ✔ Depth (inches): N/A

Water Table Present? Yes _____ No ✔ Depth (inches): N/A

Saturation Present? (includes capillary fringe) Yes _____ No ✔ Depth (inches): N/A

**Wetland Hydrology Present? Yes _____ No ✔**

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

N/A

Remarks:

FAC-Neutral test not met. No wetland hydrology indicators observed.

# WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Santa Ana Truck Terminal City/County: Bloomington/San Bernardino County Sampling Date: 11/02/2022

Applicant/Owner: Kimley-Horn State: CA Sampling Point: WDP 3

Investigator(s): Kelsey Woldt, Sarah Krejca Section, Township, Range: S25, T01S, R05W

Landform (hillslope, terrace, etc.): depressional area Local relief (concave, convex, none): Slightly concave Slope (%): 0-1%

Subregion (LRR): LRR C - Mediterranean California Lat: 34.050992 Long: -117.365473 Datum: WGS 84

Soil Map Unit Name: Quarries & Pits soils NWI classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ✔ (If no, explain in Remarks.)

Are Vegetation ____, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✔ No ____

Are Vegetation ____, Soil ____, or Hydrology ✔ naturally problematic? (If needed, explain any answers in Remarks.)

## SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

| | | | |
|---|---|---|---|
| Hydrophytic Vegetation Present? | Yes ✔ | No ____ | **Is the Sampled Area within a Wetland?** Yes ____ No ✔ |
| Hydric Soil Present? | Yes ____ | No ✔ | |
| Wetland Hydrology Present? | Yes ____ | No ✔ | |

Remarks:

Sample point taken within depressional area mapped as mulefat thickets within highly disturbed site that contains piles of fill and is surrounded by developed/industrial areas. Drought conditions per APT (i.e., atypical hydrologic conditions/naturally problematic); however, data collected immediately following a precipitation event (0.23 inch of precipitation on 11/02/2022 per the AgACIS Ontario International Airport station).

## VEGETATION – Use scientific names of plants.

| Tree Stratum (Plot size: N/A) | Absolute % Cover | Dominant Species? | Indicator Status |
|---|---|---|---|
| 1. | | | |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| | N/A = Total Cover | | |
| **Sapling/Shrub Stratum (Plot size: 5-foot radius)** | | | |
| 1. Tamarix ramosissima | 30% | Yes | FAC |
| 2. Baccharis salicifolia | 20% | Yes | FAC |
| 3. | | | |
| 4. | | | |
| 5. | | | |
| | 50% = Total Cover | | |
| **Herb Stratum (Plot size: 5-foot radius)** | | | |
| 1. Rumex crispus | 50% | Yes | FAC |
| 2. Brassica nigra | 20% | Yes | NL/UPL |
| 3. Erigeron canadensis | 15% | No | FACU |
| 4. Sisymbrium altissimum | 11% | No | FACU |
| 5. Centaurea melitensis | 2% | No | NL/UPL |
| 6. | | | |
| 7. | | | |
| 8. | | | |
| | 98% = Total Cover | | |
| **Woody Vine Stratum (Plot size: N/A)** | | | |
| 1. | | | |
| 2. | | | |
| | N/A = Total Cover | | |

% Bare Ground in Herb Stratum 2% % Cover of Biotic Crust 0%

**Dominance Test worksheet:**

Number of Dominant Species That Are OBL, FACW, or FAC: 3 (A)

Total Number of Dominant Species Across All Strata: 4 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 75% (A/B)

**Prevalence Index worksheet:**

| Total % Cover of: | Multiply by: |
|---|---|
| OBL species | x 1 = |
| FACW species | x 2 = |
| FAC species | x 3 = |
| FACU species | x 4 = |
| UPL species | x 5 = |
| Column Totals: (A) | (B) |

Prevalence Index = B/A =

**Hydrophytic Vegetation Indicators:**

✔ Dominance Test is >50%

___ Prevalence Index is ≤3.0[1]

___ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Hydrophytic Vegetation Present?** Yes ✔ No ____

Remarks:

Sample point taken within area mapped as mulefat thickets. Tamarix ramosissima is synonymous with Tamarix chinensis (FAC) per the NWPL.

## SOIL

Sampling Point: WDP 3

**Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)**

| Depth (inches) | Matrix Color (moist) | Matrix % | Redox Features Color (moist) | Redox Features % | Redox Features Type[1] | Redox Features Loc[2] | Texture | Remarks |
|---|---|---|---|---|---|---|---|---|
| 0-10 | 5 Y 5/2 | 100% | N/A | N/A | N/A | N/A | Clay | No evidence of redox observed |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

**Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)**

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5) (**LRR C**)
- ___ 1 cm Muck (A9) (**LRR D**)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Vernal Pools (F9)

**Indicators for Problematic Hydric Soils[3]:**

- ___ 1 cm Muck (A9) (**LRR C**)
- ___ 2 cm Muck (A10) (**LRR B**)
- ___ Reduced Vertic (F18)
- ___ Red Parent Material (TF2)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

**Restrictive Layer (if present):**

Type: Shovel refusal - compact soils

Depth (inches): @ 10 inches

**Hydric Soil Present?** Yes ____ No ✔

Remarks:

Dry soils; soils moistened with spray bottle to record soil color. Uniform soils throughout. No hydric soil indicators observed.

## HYDROLOGY

**Wetland Hydrology Indicators:**

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1) (**Nonriverine**)
- ___ Sediment Deposits (B2) (**Nonriverine**)
- ___ Drift Deposits (B3) (**Nonriverine**)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Water-Stained Leaves (B9)
- ___ Salt Crust (B11)
- ___ Biotic Crust (B12)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water Marks (B1) (**Riverine**)
- ___ Sediment Deposits (B2) (**Riverine**)
- ___ Drift Deposits (B3) (**Riverine**)
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)

**Field Observations:**

Surface Water Present? Yes ____ No ✔ Depth (inches): N/A

Water Table Present? Yes ____ No ✔ Depth (inches): N/A

Saturation Present? (includes capillary fringe) Yes ____ No ✔ Depth (inches): N/A

**Wetland Hydrology Present?** Yes ____ No ✔

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

N/A

Remarks:

FAC-Neutral test not met. Although inundation was visible on Google Earth aerial images from September 2004 through November 2009, the site was completely graded in February 2016 and no inundation has been visible in aerial imagery since, except for a very small area of ponded water visible in an image dated April 23, 2020, which was 11 days after a 7-day precipitation event totaling approximately 3.43 inches of rain (per the AgACIS Ontario International Airport station); as such, B7 was not met. No wetland hydrology indicators observed.

## WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: Santa Ana Truck Terminal City/County: Bloomington/San Bernardino County Sampling Date: 11/02/2022

Applicant/Owner: Kimley-Horn State: CA Sampling Point: WDP 4

Investigator(s): Kelsey Woldt, Sarah Krejca Section, Township, Range: S25, T01S, R05W

Landform (hillslope, terrace, etc.): slight depressional area Local relief (concave, convex, none): Slightly concave Slope (%): 0-1%

Subregion (LRR): LRR C - Mediterranean California Lat: 34.053457 Long: -117.362684 Datum: WGS 84

Soil Map Unit Name: Quarries & Pits soils NWI classification: Freshwater pond (PUS)

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ✔ (If no, explain in Remarks.)

Are Vegetation ____, Soil ✔, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✔ No ____

Are Vegetation ____, Soil ____, or Hydrology ✔ naturally problematic? (If needed, explain any answers in Remarks.)

### SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

| | | | |
|---|---|---|---|
| Hydrophytic Vegetation Present? | Yes ✔ | No ____ | **Is the Sampled Area within a Wetland?** Yes ____ No ✔ |
| Hydric Soil Present? | Yes ____ | No ✔ | |
| Wetland Hydrology Present? | Yes ✔ | No ____ | |

Remarks:

Sample point taken within slight depressional area mapped as tamarisk thickets within highly disturbed site that contains piles of fill and is surrounded by developed/industrial areas. Soil considered significantly disturbed as compact soils/fill material was present starting at a depth of 6 inches. Drought conditions per APT (i.e., atypical hydrologic conditions/naturally problematic); however, data collected immediately following a precipitation event (0.23 inch of precipitation on 11/02/2022 per the AgACIS Ontario International Airport station).

### VEGETATION – Use scientific names of plants.

| Tree Stratum (Plot size: 15-foot radius) | Absolute % Cover | Dominant Species? | Indicator Status |
|---|---|---|---|
| 1. Tamarix ramosissima | 35% | Yes | FAC |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| | 35% = Total Cover | | |
| **Sapling/Shrub Stratum (Plot size: 5-foot radius)** | | | |
| 1. Tamarix ramosissima | 10% | Yes | FAC |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| 5. | | | |
| | 10% = Total Cover | | |
| **Herb Stratum (Plot size: 5-foot radius)** | | | |
| 1. Dittrichia graveolens | 5% | Yes | NL/UPL |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| 5. | | | |
| 6. | | | |
| 7. | | | |
| 8. | | | |
| | 5% = Total Cover | | |
| **Woody Vine Stratum (Plot size: N/A)** | | | |
| 1. | | | |
| 2. | | | |
| | N/A = Total Cover | | |

% Bare Ground in Herb Stratum 95% % Cover of Biotic Crust 0%

**Dominance Test worksheet:**

Number of Dominant Species That Are OBL, FACW, or FAC: 2 (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 66% (A/B)

**Prevalence Index worksheet:**

| Total % Cover of: | | Multiply by: | |
|---|---|---|---|
| OBL species | 0 | x 1 = | 0 |
| FACW species | 0 | x 2 = | 0 |
| FAC species | 45 | x 3 = | 135 |
| FACU species | 0 | x 4 = | 0 |
| UPL species | 5 | x 5 = | 25 |
| Column Totals: | 50 (A) | | 160 (B) |

Prevalence Index = B/A = 3.2

**Hydrophytic Vegetation Indicators:**

___ Dominance Test is >50%

___ Prevalence Index is ≤3.0[1]

___ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Hydrophytic Vegetation Present?** Yes ____ No ✔

Remarks:

Sample point taken within area mapped as tamarisk thickets. Tamarix ramosissima is synonymous with Tamarix chinensis (FAC) per the NWPL.

## SOIL

Sampling Point: WDP 4

**Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)**

| Depth (inches) | Matrix Color (moist) | Matrix % | Redox Features Color (moist) | Redox Features % | Type[1] | Loc[2] | Texture | Remarks |
|---|---|---|---|---|---|---|---|---|
| 0-4 | 5 Y 5/2 | 100% | N/A | N/A | N/A | N/A | Clay | No evidence of redox observed |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

**Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)**

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5) (**LRR C**)
- ___ 1 cm Muck (A9) (**LRR D**)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Vernal Pools (F9)

**Indicators for Problematic Hydric Soils[3]:**

- ___ 1 cm Muck (A9) (**LRR C**)
- ___ 2 cm Muck (A10) (**LRR B**)
- ___ Reduced Vertic (F18)
- ___ Red Parent Material (TF2)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

**Restrictive Layer (if present):**

Type: Shovel refusal - compact soils/fill material

Depth (inches): @ 4 inches

**Hydric Soil Present?** Yes ____ No ✔

Remarks:

Dry soils; soils moistened with spray bottle to record soil color. Uniform soils throughout. No hydric soil indicators observed.

## HYDROLOGY

**Wetland Hydrology Indicators:**

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1) (**Nonriverine**)
- ___ Sediment Deposits (B2) (**Nonriverine**)
- ___ Drift Deposits (B3) (**Nonriverine**)
- ✔ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Water-Stained Leaves (B9)
- ___ Salt Crust (B11)
- ___ Biotic Crust (B12)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water Marks (B1) (**Riverine**)
- ___ Sediment Deposits (B2) (**Riverine**)
- ___ Drift Deposits (B3) (**Riverine**)
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)

**Field Observations:**

Surface Water Present? Yes ____ No ✔ Depth (inches): N/A

Water Table Present? Yes ____ No ✔ Depth (inches): N/A

Saturation Present? (includes capillary fringe) Yes ____ No ✔ Depth (inches): N/A

**Wetland Hydrology Present?** Yes ✔ No ____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

N/A

Remarks:

Surface soil cracks present throughout sampling area. FAC-Neutral test not met.

# Arid West Ephemeral and Intermittent Streams OHWM Datasheet

**Project:** Santa Ana Truck Terminal
**Project Number:** N/A
**Stream:** ODP 1
**Investigator(s):** Kelsey Woldt, Sarah Krejca

**Date:** 11/02/2022 **Time:** 0945
**Town:** Bloomington **State:** CA
**Photo begin file#:** N/A **Photo end file#:** N/A

Y ☑ / N ☐ Do normal circumstances exist on the site?

Y ☑ / N ☐ Is the site significantly disturbed?

**Location Details:**
Santa Ana Truck Terminal Project Site

**Projection:** WGS 84 **Datum:** NAD 83
**Coordinates:** 34.052675, -117.363195

**Potential anthropogenic influences on the channel system:**
Highly incised erosional feature within a highly disturbed site that contains piles of fill that redirect stormwater runoff from the surrounding land, including a paved truck lost and other developed/industrial areas.

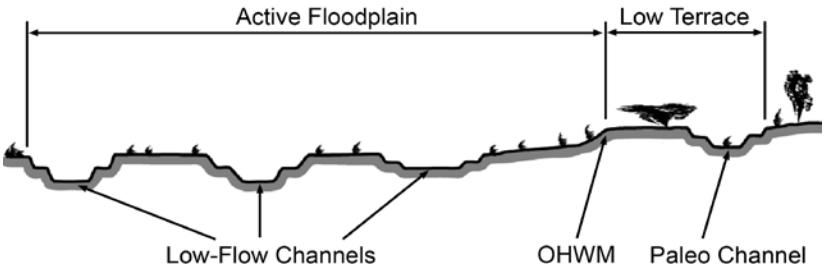
**Brief site description:**
Highly disturbed site south of a paved truck lot and adjacent to other developed/industrial areas. Site contains piles of fill and large pieces of scrap metal.

**Checklist of resources (if available):**

- ☑ Aerial photography
  Dates:
- ☑ Topographic maps
- ☐ Geologic maps
- ☑ Vegetation maps
- ☑ Soils maps
- ☑ Rainfall/precipitation maps
- ☐ Existing delineation(s) for site
- ☑ Global positioning system (GPS)
- ☐ Other studies

- ☐ Stream gage data
  Gage number:
  Period of record:
- ☐ History of recent effective discharges
- ☐ Results of flood frequency analysis
- ☐ Most recent shift-adjusted rating
- ☐ Gage heights for 2-, 5-, 10-, and 25-year events and the most recent event exceeding a 5-year event

Hydrogeomorphic Floodplain Units

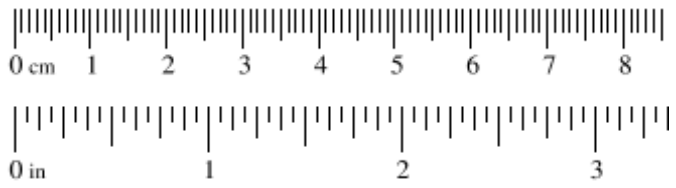



**Procedure for identifying and characterizing the floodplain units to assist in identifying the OHWM:**

1. Walk the channel and floodplain within the study area to get an impression of the geomorphology and vegetation present at the site.
2. Select a representative cross section across the channel. Draw the cross section and label the floodplain units.
3. Determine a point on the cross section that is characteristic of one of the hydrogeomorphic floodplain units.
   a) Record the floodplain unit and GPS position.
   b) Describe the sediment texture (using the Wentworth class size) and the vegetation characteristics of the floodplain unit.
   c) Identify any indicators present at the location.
4. Repeat for other points in different hydrogeomorphic floodplain units across the cross section.
5. Identify the OHWM and record the indicators. Record the OHWM position via:
   - ☑ Mapping on aerial photograph
   - ☑ Digitized on computer
   - ☑ GPS
   - ☐ Other:

## Wentworth Size Classes

| Inches (in) | Millimeters (mm) | Wentworth size class | |
|---|---|---|---|
| 10.08 | 256 | Boulder | |
| 2.56 | 64 | Cobble | Gravel |
| 0.157 | 4 | Pebble | |
| 0.079 | 2.00 | Granule | |
| 0.039 | 1.00 | Very coarse sand | |
| 0.020 | 0.50 | Coarse sand | |
| 1/2 0.0098 | 0.25 | Medium sand | Sand |
| 1/4 0.005 | 0.125 | Fine sand | |
| 1/8 0.0025 | 0.0625 | Very fine sand | |
| 1/16 0.0012 | 0.031 | Coarse silt | |
| 1/32 0.00061 | 0.0156 | Medium silt | Silt |
| 1/64 0.00031 | 0.0078 | Fine silt | |
| 1/128 0.00015 | 0.0039 | Very fine silt | |
| | | Clay | Mud |



**Project ID:** Santa Ana Truck Terminal **Cross section ID:** ODP 1 **Date:** 11/02/2022 **Time:** 0945

**Cross section drawing:**


## OHWM

**GPS point:** 34.052675, -117.363195

**Indicators:**

- ☐ Change in average sediment texture
- ☐ Change in vegetation species
- ☐ Change in vegetation cover
- ☑ Break in bank slope
- ☐ Other: _____
- ☐ Other: _____

**Comments:**

Erosional feature that exhibited an abrupt/highly incised break in bank slope. Although the erosional feature exhibited a slight change in vegetation cover and species from the surrounding uplands (increased abundance of Ricinus communis within the erosional feature), the feature did not show evidence of recent flows based on the presence of a dense layer of leaf litter and debris within the erosional feature and lack of a distinctive change in average sediment texture. Additionally, the feature abruptly commenced and terminated on site and occurred in an area of lower topography from the surrounding upland areas that was covered in piles of fill that appeared to redirect sheet flow toward this erosional feature. Drought conditions per APT (i.e., atypical hydrologic conditions/ naturally problematic); however, data collected immediately following a precipitation event (0.23 inch of precipitation on 11/02/2022 per the AgACIS Ontario International Airport station).

## Floodplain unit: ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace/Upland

**GPS point:** N/A

**Characteristics of the floodplain unit:**

Average sediment texture: _____

Total veg cover: _____ % Tree: _____% Shrub: _____% Herb: _____%

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
- ☐ Late (herbaceous, shrubs, mature trees)

**Indicators:**

- ☐ Mudcracks
- ☐ Ripples
- ☐ Drift and/or debris
- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

**Comments:**

**Project ID:** Santa Ana Truck Terminal **Cross section ID:** ODP 1 **Date:** 11/02/2022 **Time:** 0945

**Floodplain unit:** ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace/Upland

**GPS point:** N/A

**Characteristics of the floodplain unit:**

Average sediment texture: _____

Total veg cover: _____ % Tree: _____% Shrub: _____% Herb: _____%

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
- ☐ Late (herbaceous, shrubs, mature trees)

**Indicators:**

- ☐ Mudcracks
- ☐ Ripples
- ☐ Drift and/or debris
- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

**Comments:**

**Floodplain unit:** ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace/Upland

**GPS point:** N/A

**Characteristics of the floodplain unit:**

Average sediment texture: _____

Total veg cover: _____ % Tree: _____% Shrub: _____% Herb: _____%

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
- ☐ Late (herbaceous, shrubs, mature trees)

**Indicators:**

- ☐ Mudcracks
- ☐ Ripples
- ☐ Drift and/or debris
- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

**Comments:**

# Arid West Ephemeral and Intermittent Streams OHWM Datasheet

**Project:** Santa Ana Truck Terminal
**Project Number:** N/A
**Stream:** ODP 2
**Investigator(s):** Sarah Krejca

**Date:** 11/02/2022 **Time:** 1310
**Town:** Bloomington **State:** CA
**Photo begin file#:** N/A **Photo end file#:** N/A

Y ☑ / N ☐ Do normal circumstances exist on the site?

Y ☑ / N ☐ Is the site significantly disturbed?

**Location Details:**
Santa Ana Truck Terminal Project Site

**Projection:** WGS 84 **Datum:** NAD 83
**Coordinates:** 34.053556, -117.363141

**Potential anthropogenic influences on the channel system:**
Incised erosional feature within a highly disturbed site that originates as runoff from a paved truck lot. Area surrounded by other developed/industrial areas.

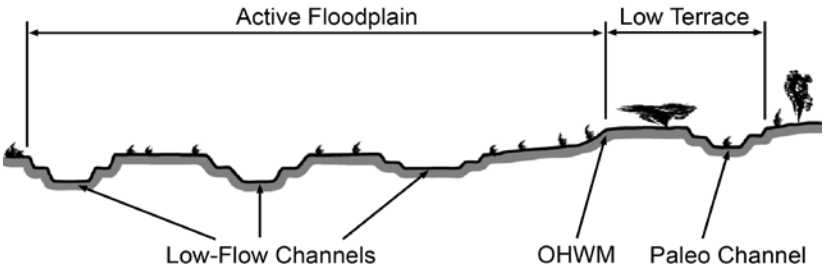
**Brief site description:**
Highly disturbed site south of a paved truck lot and adjacent to other developed/industrial areas. Site contains piles of fill and large pieces of scrap metal.

**Checklist of resources (if available):**

- ☑ Aerial photography
  Dates:
- ☑ Topographic maps
- ☐ Geologic maps
- ☑ Vegetation maps
- ☑ Soils maps
- ☑ Rainfall/precipitation maps
- ☐ Existing delineation(s) for site
- ☑ Global positioning system (GPS)
- ☐ Other studies

- ☐ Stream gage data
  Gage number:
  Period of record:
- ☐ History of recent effective discharges
- ☐ Results of flood frequency analysis
- ☐ Most recent shift-adjusted rating
- ☐ Gage heights for 2-, 5-, 10-, and 25-year events and the most recent event exceeding a 5-year event

Hydrogeomorphic Floodplain Units

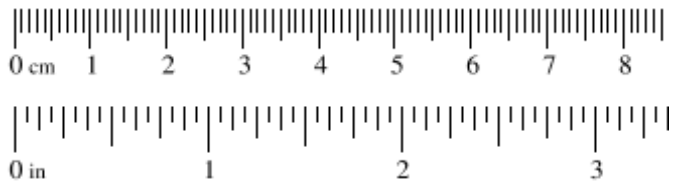



**Procedure for identifying and characterizing the floodplain units to assist in identifying the OHWM:**

1. Walk the channel and floodplain within the study area to get an impression of the geomorphology and vegetation present at the site.
2. Select a representative cross section across the channel. Draw the cross section and label the floodplain units.
3. Determine a point on the cross section that is characteristic of one of the hydrogeomorphic floodplain units.
   a) Record the floodplain unit and GPS position.
   b) Describe the sediment texture (using the Wentworth class size) and the vegetation characteristics of the floodplain unit.
   c) Identify any indicators present at the location.
4. Repeat for other points in different hydrogeomorphic floodplain units across the cross section.
5. Identify the OHWM and record the indicators. Record the OHWM position via:
   - ☑ Mapping on aerial photograph
   - ☑ Digitized on computer
   - ☑ GPS
   - ☐ Other:

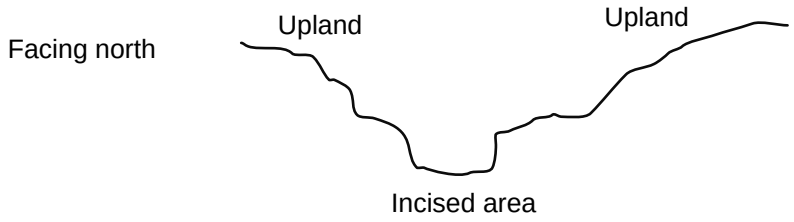
## Wentworth Size Classes

| Inches (in) | Millimeters (mm) | Wentworth size class | |
|---|---|---|---|
| 10.08 | 256 | Boulder | |
| 2.56 | 64 | Cobble | Gravel |
| 0.157 | 4 | Pebble | |
| 0.079 | 2.00 | Granule | |
| 0.039 | 1.00 | Very coarse sand | |
| 0.020 | 0.50 | Coarse sand | |
| 1/2 0.0098 | 0.25 | Medium sand | Sand |
| 1/4 0.005 | 0.125 | Fine sand | |
| 1/8 0.0025 | 0.0625 | Very fine sand | |
| 1/16 0.0012 | 0.031 | Coarse silt | |
| 1/32 0.00061 | 0.0156 | Medium silt | Silt |
| 1/64 0.00031 | 0.0078 | Fine silt | |
| 1/128 0.00015 | 0.0039 | Very fine silt | |
| | | Clay | Mud |



**Project ID:** Santa Ana Truck Terminal **Cross section ID:** ODP 2 **Date:** 11/02/2022 **Time:** 1310

**Cross section drawing:**




## OHWM

**GPS point:** 34.053556, -117.363141

**Indicators:**

- ☐ Change in average sediment texture
- ☐ Change in vegetation species
- ☐ Change in vegetation cover
- ☑ Break in bank slope
- ☐ Other: _____
- ☐ Other: _____

**Comments:**

Erosional feature that exhibited an abrupt break in bank slope abut did not exhibit a distinctive change in average sediment texture, vegetation species or cover, or any other OHWM indicators. Erosional feature with similar vegetation (disturbed habitat) and sediment texture as surrounding uplands. Drought conditions per APT (i.e., atypical hydrologic conditions/naturally problematic); however, data collected immediately following a precipitation event (0.23 inch of precipitation on 11/02/2022 per the AgACIS Ontario International Airport station).

## Floodplain unit: ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace/Upland

**GPS point:** N/A

**Characteristics of the floodplain unit:**

Average sediment texture: _____

Total veg cover: _____ % Tree: _____% Shrub: _____% Herb: _____%

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
- ☐ Late (herbaceous, shrubs, mature trees)

**Indicators:**

- ☐ Mudcracks
- ☐ Ripples
- ☐ Drift and/or debris
- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

**Comments:**

**Project ID:** Santa Ana Truck Terminal **Cross section ID:** ODP 2 **Date:** 11/02/2022 **Time:** 1310

**Floodplain unit:** ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace/Upland

**GPS point:** N/A

**Characteristics of the floodplain unit:**

Average sediment texture: _____

Total veg cover: _____ % Tree: _____% Shrub: _____% Herb: _____%

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
- ☐ Late (herbaceous, shrubs, mature trees)

**Indicators:**

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- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

**Comments:**

**Floodplain unit:** ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace/Upland

**GPS point:** N/A

**Characteristics of the floodplain unit:**

Average sediment texture: _____

Total veg cover: _____ % Tree: _____% Shrub: _____% Herb: _____%

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- ☐ NA
- ☐ Early (herbaceous & seedlings)
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- ☐ Late (herbaceous, shrubs, mature trees)

**Indicators:**

- ☐ Mudcracks
- ☐ Ripples
- ☐ Drift and/or debris
- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

**Comments:**

# APPENDIX D

# HABITAT ASSESSMENT FOR THE DELHI SANDS FLOWER-LOVING FLY FOR THE SANTA ANA TRUCK TERMINAL PROJECT (ASSESSOR PARCEL NUMBER 0258-141-18), CITY OF RIALTO, SAN BERNARDINO COUNTY, CALIFORNIA

In Reply Refer To 2024-0053298

Mr. Andrew Falzarano
Project Manager,
Crown Enterprises LLC
12225 Stephens
Warren, Michigan 408089

Jim Rocks
Rocks Biological Consulting
2621 Denver St. Suite B
San Diego, CA 92110

Subject: Habitat Assessment for the Delhi Sands Flower-loving Fly for the Santa Ana Truck Terminal Project (Assessor Parcel Number 0258-141-18), City of Rialto, San Bernardino County, California.

We, the U.S. Fish and Wildlife Service (Service), received your email on December 5, 2023, requesting our review of the Santa Ana Truck Terminal Project site potential as habitat for the federally endangered Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*, DSF). We requested more information concerning the scope of the project and a more detailed assessment of the habitat. On December 7, 2023, we received photos of the delhi soils area of the Project site completed by Rocks Biological Consultant (Rocks). Amanda Swaller of the Service preformed a site visit on February 13, 2024, with Ian Hirschler of Rocks.

The project site is at the existing Crown Venture Holdings, LLC facility in the City of Rialto, San Bernardino County California. The site is located southeast of the corner of Riverside Avenue and Santa Ana Avenue and is surrounded on all sides by existing commercial/industrial development. Other quarry operations lie to the northwest and northeast, the Agua Mansa Properties Material and Recovery Transfer Station on the south, and a wastewater treatment facility on the east. A Southern California Edison easement runs east to west along the southerly portion of the project site.

The soils on the project site are mapped as Quarries and Pits and Delhi fine sand. Delhi fine sands consist of approximately 4.2 acres and occur on the southwest corner of the project site. The portion of the site has been heavily affected by quarry activities. Approximately 2.4 acres of the total 4.2 acres of Delhi fine sands have been excavated. The remaining 1.8 acres occur on a plateau and a slope above the main quarry. The majority existing soils have been compacted to reduce slope erosion. Soils not compacted on the slope have 100 percent ground cover. Overall, the site is not suitable habitat for DSF.

Based on our review of the assessment, site photos, and a site visit we concur with the assessment's determination that the site is unsuitable for DSF due to the high amount of habitat disturbance and vegetation cover.

If you have any further questions, please contact me.