

APPENDIX F

Biological Resources Assessment



April 10, 2026

MERIDIAN CONSULTANTS

Attention: *Tony Locacciato*
860 Hampshire Rd, Suite P
Westlake Village, CA 91361

SUBJECT: Habitat Assessment and Coachella Valley Multiple Species Habitat Conservation Plan Consistency Analysis (CVMSHCP) Report for The Ranch at Madison Project Located in La Quinta, Riverside County, California

Introduction

This report contains the findings of ELMT Consulting’s biological resources assessment for the proposed The Ranch at Madison project located within Assessor Parcel Numbers (APNs) 780-010-012, -013, -014, and 780-020-001, -002, -003 in the City of La Quinta, Riverside County, California. ELMT biologist Megan E. Peukert conducted a field survey and evaluated the condition of the habitat within the proposed project site on October 30, 2024. The literature review and field investigation were conducted to characterize existing site conditions and assess the probability of occurrence of special-status¹ plant and wildlife species that could pose a constraint to implementation of the project. This report provides a detailed assessment of the suitability of the on-site habitat to support special-status plant and wildlife species that were identified by the California Natural Diversity Database (CNDDDB) and other electronic databases as potentially occurring in the vicinity of the proposed project site. Special attention was given to the suitability of the on-site habitat to support species protected under the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), and potential jurisdictional drainage features.

Project Location

The proposed project site is generally located south and west of state route 111 and north and east of the Santa Rosa mountains in La Quinta, Riverside County, California. The site is depicted on the Indio quadrangle of the United States Geological Survey’s (USGS) 7.5-minute topographic map series within Section 11 of Township 6 South, Range 7 East. Specifically, the proposed project site is located between 52nd Avenue and Avenue 54 on the north and south, respectively, and Monroe Street and Jackson Street on the west and east, respectively, within the southeast portion of Assessor’s Parcel Numbers (APNs) 780-010-012, -013, -014, and 780-020-001, -002, -003. Avenue 53 bisects the project site. Refer to Exhibits 1-3 in Attachment A.

¹ As used in this report, “special-status” refers to plant and wildlife species that are federally or State listed, proposed, or candidates; CVMSHCP listed species; plant species that have been designated a CNPS Rare Plant Rank; and wildlife species that are designated by the CDFW as fully protected, species of special concern, or watch list species.

Methodology

Literature Review

Prior to conducting the field investigation, a literature review and records search was conducted for special-status biological resources potentially occurring on or within the vicinity of the project site. Previously recorded occurrences of special-status plant and wildlife species and their proximity to the project site were determined through a query of the CDFW's CNDDDB Rarefind 5, the California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California, Calflora Database, compendia of special-status species published by CDFW, and the United States Fish and Wildlife Service (USFWS) species listings.

Literature detailing biological resources previously observed in the vicinity of the project site and historical land uses were reviewed to understand the extent of disturbances to the habitats on-site. Standard field guides and texts on special-status and non-special-status biological resources were reviewed for habitat requirements, as well as the following resources:

- CDFW 2012 Staff Report on Burrowing Owl Mitigation;
- Coachella Valley Multiple Species Habitat Conservation Plan;
- Google Earth Pro historic aerial imagery (1985-2024);
- United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Soil Survey²; and
- USFWS Critical Habitat designations for Threatened and Endangered Species.

The literature review provided a baseline from which to inventory the biological resources potentially occurring on the project site. Additional recorded occurrences of these species found on or near the project site were derived from database queries. The CNDDDB ArcGIS database was used, in conjunction with ArcGIS software, to locate the nearest occurrence and determine the distance from the project site.

Field Investigation

ELMT biologist Megan E. Peukert inventoried and evaluated the extent and conditions of the plant communities found within the boundaries of the project site and a 200-foot buffer on October 30, 2024. Plant communities identified on aerial photographs during the literature review were verified by walking meandering transects through the plant communities and along boundaries between plant communities. The plant communities were evaluated for their potential to support special-status plant and wildlife species. In addition, field staff identified any natural corridors and linkages that may support the movement of wildlife through the area. Special attention was given to special-status habitats and/or undeveloped areas, which have higher potential to support special-status plant and wildlife species.

All plant and wildlife species observed, as well as dominant plant species within each plant community, were recorded. Wildlife detections were made through observation of scat, trails, tracks, burrows, nests, and/or visual and aural observation. In addition, site characteristics such as soil condition, topography,

2 A soil series is defined as a group of soils with similar profiles developed from similar parent materials under comparable climatic and vegetation conditions. These profiles include major horizons with similar thickness, arrangement, and other important characteristics, which may promote favorable conditions for certain biological resources.

hydrology, anthropogenic disturbances, indicator species, condition of on-site plant communities, and presence of potential jurisdictional drainage and/or wetland features were noted.

Soil Series Assessment

On-site and adjoining soils were researched prior to the field visit using the USDA NRCS Soil Survey for Riverside County, California. In addition, a review of the local geological conditions and historical aerial photographs was conducted to assess the ecological changes the project site has undergone.

Plant Communities

Plant communities were mapped using 7.5-minute USGS topographic base maps and aerial photography. The plant communities were delineated on an aerial photograph, classified in accordance with those described in the MSHCP, and then digitized into GIS Arcview. The Arcview application was used to compute the area of each plant community in acres.

Plants

Common plant species observed during the field survey were identified by visual characteristics and morphology in the field and recorded in a field notebook. Unusual and less-familiar plants were photographed in the field and identified in the laboratory using taxonomic guides. Taxonomic nomenclature used in this study follows the 2012 Jepson Manual (Hickman 2012). In this report, scientific names are provided immediately following common names of plant species (first reference only).

Wildlife

Wildlife species detected during field surveys by sight, calls, tracks, scat, or other sign were recorded during surveys in a field notebook. Field guides were used to assist with identification of wildlife species during the survey included The Sibley Field Guide to the Birds of Western North America (Sibley 2003), A Field Guide to Western Reptiles and Amphibians (Stebbins 2003), and A Field Guide to Mammals of North America (Reid 2006). Although common names of wildlife species are fairly well standardized, scientific names are provided immediately following common names in this report (first reference only).

Jurisdictional Drainages and Wetlands

Aerial photography was reviewed prior to conducting a field investigation in order to locate and inspect any potential natural drainage features, ponded areas, or water bodies that may fall under the jurisdiction of the United States Army Corps of Engineers (Corps), Regional Water Quality Control Board (Regional Board), or CDFW. In general, surface drainage features indicated as blue-line streams on USGS maps that are observed or expected to exhibit evidence of flow are considered potential riparian/riverine habitat and are also subject to state and federal regulatory jurisdiction. In addition, ELMT reviewed jurisdictional waters information through examining historical aerial photographs to gain an understanding of the impact of land-use on natural drainage patterns in the area. The USFWS National Wetland Inventory (NWI) and Environmental Protection Agency (EPA) Water Program “My Waters” data layers were also reviewed to determine whether any hydrologic features and wetland areas have been documented on or within the vicinity of the project site.

Topography and Soils

On-site surface elevation ranges from approximately -40 to -9 feet below mean sea level. The project site slopes gently from south to north and is relatively flat with no natural areas of significant topographic relief. Based on the USDA NRCS Soil Survey, the site is underlain by the following soil units: Myoma fine sand (0 to 5 percent slopes), Gilman fine sandy loam (0 to 2 percent slopes), Gilman fine sandy loam, wet (0 to 2 percent slopes), and Indio fine sandy loam. Soils within the project site are heavily disturbed by historic use associated with agricultural development. Refer to Exhibit 4, *Soils*, in Attachment A.

Existing Site Conditions

The project site is located in a mostly developed area in the eastern portion of La Quinta. Industrial, commercial, agricultural, and residential developments are scattered through the area as well as undeveloped vacant land near Interstate 10 and State Route 86. The site is bordered to the north by residential development as well as a vacant, undeveloped plot; to the west by Madison Country Club Golf Course; to the south by Cavallo Ranch with additional agricultural development beyond; and to the east by agricultural development with residential housing beyond. The site itself primarily supports undeveloped, disturbed land that does not support natural plant communities. There are existing residential developments in the middle of the northern portion of the site.

Vegetation

No undisturbed natural plant communities were observed onsite. The project site supports four (4) land types classified as agricultural, disturbed, developed, and a water detention basin (refer to Exhibit 5, *Vegetation*, in Attachment A). Refer to Attachment B, *Site Photographs*, for representative site photographs.

Agricultural

The southern half of the project site, south of Avenue 53 primarily supported active agricultural fields during the survey. These areas supported sprinklers and row crops. Additionally, the middle of the northern half of the project site supports date palm (*Phoenix dactylifera*) crops.

Disturbed

The northern half of the project site primarily supports disturbed land that historically was used for agricultural purposes. These disturbed areas are mostly barren as routine vegetation removal has inhibited the establishment of natural plant communities. Vegetation onsite consists of primarily weedy annual species such as Saharan mustard (*Brassica tournefortii*), Russian thistle (*Salsola tragus*), and mediterranean grass (*Schismus barbatus*). Additional species observed include arrowweed (*Pluchea sericea*), western honey mesquite (*Neltuma odorata*), fourwing saltbush (*Atriplex canescens*), tamarisk (*Tamarix sp.*), and honeysweet (*Tidestromia suffruticosa*). Additionally, the access paths around the agricultural fields and road shoulders supported barren areas that were classified as disturbed.

Developed

Developed areas onsite included Avenue 53, a paved roadway, and a residential development in the middle of the northern boundary of the project site within the date palm crop.

Water Detention Basin

Three water detention basins were observed on the project site to support watering of the agricultural crops. No riparian vegetation was observed within these basins. Two were observed on the southern half of the project site in association with the active agricultural crops, and one on the northwest corner of the project site that historically supported agricultural crops on the northern half of the site.

Wildlife

Plant communities provide foraging habitat, nesting/denning sites, and shelter from adverse weather or predation. This section provides a discussion of those wildlife species that were observed or are expected to occur within the project site. The discussion is to be used as a general reference and is limited by the season, time of day, and weather conditions in which the field survey was conducted. Wildlife detections were based on calls, songs, scat, tracks, burrows, and direct observation.

Fish

No fish were observed on or within the vicinity of the project site or off-site street improvement areas. The water detention basins have no connection to suitable habitat for local fish species. The only fish species that may be expected to occur on-site is mosquitofish (*Gambusia affinis*), which is introduced to still water in association with insect-borne disease vector mitigation efforts. No native fish are expected to occur and are presumed absent from the project site.

Amphibians

No amphibians were observed on or within the vicinity of the project site or off-site street improvement areas. The three water detention basins provide limited habitat for local amphibian species adapted to development and routine anthropogenic disturbances. Common amphibians that could be expected to occur on-site include western toad (*Anaxyrus boreas*) and black-bellied salamander (*Batrachoseps nigriventris*). Due to the high level of development and routine anthropogenic disturbances on-site, no special-status amphibian species are expected to occur within project site.

Reptiles

The project site provides suitable foraging and cover habitat for reptilian species adapted to routine human disturbance and desert environments. No reptiles were observed during the field investigation. Other common reptilian species that may occur on-site include Great Basin whiptail (*Aspidoscelis tigris tigris*), red racer (*Coluber flagellum piceus*), desert iguana (*Dipsosaurus dorsalis*), and San Diego gopher snake (*Pituophis catenifer annectens*).

Birds

The project site provides suitable foraging and nesting habitat for avian species adapted to routine human disturbance and desert environments. The avian species detected during the field investigation was common raven (*Corvus corax*), house finch (*Haemorhous mexicanus*), greater roadrunner (*Geococcyx californianus*), mourning dove (*Zenaida macroura*), white-crowned sparrow (*Zonotrichia leucophrys*), turkey vulture (*Cathartes aura*), great egret (*Ardea alba*), black phoebe (*Sayornis nigricans*), red-tailed hawk (*Buteo jamaicensis*), European starling (*Sturnus vulgaris*), red-shouldered hawk (*Buteo lineatus*), house sparrow (*Passer domesticus*), northern mockingbird (*Mimus polyglottos*), and Anna's hummingbird

(*Calypste anna*).

Mammals

The project site provides suitable foraging habitat for mammalian species adapted to routine human disturbance and desert environments. However, most mammal species are nocturnal and are difficult to observe during a diurnal field visit. Mammalian species detected during the field investigation were coyote (*Canis latrans*), desert cottontail (*Sylvilagus audubonii*), and California ground Squirrel (*Otospermophilus beecheyi*). Additionally, the project site has the potential to provide suitable foraging and/or roosting habitat for common and special-status bats species.

Nesting Birds and Raptors

No active nests or birds displaying nesting behavior were observed during the field survey, which was conducted during breeding season. The project site has the potential to provide suitable nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that area adapted to urban environments. No raptors are expected to nest on-site due to lack of suitable nesting opportunities.

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction.

Migratory Corridors and Linkages

Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

The project site has not been identified as occurring in a wildlife corridor or linkage, and there are no riparian corridors, creeks, or useful patches of steppingstone habitat (natural areas) within or connecting the site to a recognized wildlife corridor or linkage. Therefore, impacts to wildlife corridors or linkages are not expected to occur.

Jurisdictional Areas

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates discharge of dredge or fill materials into “waters of the United States” pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Regional Board regulates discharges into surface waters

pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

The USFWS NWI and the USGS National Hydrography Dataset were reviewed to determine if any blueline streams or riverine resources have been documented on the project site. Based on this review, no blueline stream or riverine resource has been documented on or adjacent to the project site.

Based on the field investigation, no jurisdictional drainage and/or wetland features were observed on the project site or within the during the field investigation. Further, no evidence of suspected jurisdictional areas were observed onsite. Therefore, development of the project will not result in impacts to Corps, Regional Board, or CDFW jurisdiction and regulatory approvals will not be required.

It should be noted that the three water detention basins observed onsite were constructed in the uplands for agricultural purposes and will not be considered jurisdictional features.

Special-Status Biological Resources

The CNDDDB was queried for reported locations of special-status plant and wildlife species as well as special-status natural plant communities in the *Indio* and *La Quinta* USGS 7.5-minute quadrangles. A search of published records of these species was conducted within this quadrangle using the CDFW's CNDDDB Rarefind 5 online software and CNDDDB Quickview Tool. The CNPS Inventory of Rare and Endangered Vascular Plants of California supplied information regarding the distribution and habitats of vascular plants in the vicinity of the project site. The field investigation was used to assess the ability of the plant communities found on-site to provide suitable habitat for relevant special-status plant and wildlife species.

The literature search identified nineteen (19) special-status plant species, thirty-nine (39) special-status wildlife species, and one (1) special-status vegetation communities as having potential to occur within the *Indio* and *La Quinta* quadrangles. Special-status plant and wildlife species were evaluated for their potential to occur within the project boundaries based on habitat requirements, availability, and quality of suitable habitat, and known distributions. Species determined to have the potential to occur within the general vicinity of the project site are presented in Attachment C, *Potentially Occurring Special-Status Biological Resources*, and discussed below.

Special-Status Plants

According to the CNDDDB and CNPS, nineteen (19) special-status plant species have been recorded in the *Indio* and *La Quinta* quadrangles (refer to Attachment C). No special-status plants were observed on the project site during the field investigation. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that that the project site does not have the potential to support any special-status plant species due to the high level of anthropogenic activities associated with current and historic agricultural land uses, and surrounding development.

Special-Status Wildlife

According to the CNDDDB, thirty-nine (39) special-status wildlife species have been reported in *Indio* and *La Quinta* quadrangles (refer to Attachment C). No special-status species observed during the field investigation. Based on habitat requirements for specific species and the availability and quality of on-site

habitats, it was determined that the project site has a moderate potential to support Cooper's hawk (*Accipiter cooperii*), burrowing owl (*Athene cunicularia*), and prairie falcon (*Falco mexicanus*); and a low potential to support black-tailed gnatcatcher (*Poliophtila melanura*). All remaining special-status wildlife species were presumed to be absent from the project site.

To ensure impacts to Cooper's hawk, prairie falcon, and black-tailed gnatcatcher do not occur from implementation of the proposed project, a pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance. With implementation of the pre-construction nesting bird clearance survey, impacts to these species will be less than significant and no mitigation will be required. Due to regional significance and/or listing status, the potential occurrence of burrowing owl is discussed in further detail below.

Burrowing Owl

Burrowing owl is currently listed as a Candidate for Listing under the California Endangered Species Act (CESA). It is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with well-drained, level to gently-sloping areas characterized by sparse vegetation and bare ground (Haug and Didiuk 1993; Dechant et al. 1999). Burrowing owls are dependent upon the presence of burrowing mammals (such as ground squirrels) whose burrows are used for roosting and nesting (Haug and Didiuk 1993). The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-made cavities, such as buried and non-functioning drainpipes, stand-pipes, and dry culverts. Burrowing mammals may burrow beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing line-of-sight observation of the surrounding habitat to forage as well as watch for predators.

No burrowing owls or recent signs (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. However, the majority of the project site provides line-of-sight observation favored by burrowing owls, and several suitable burrows (>4 inches) for roosting and nesting were observed within site boundaries. It was determined the project site has a moderate potential to support burrowing owl and a burrowing owl presence/absence focused survey is recommended.

Special-Status Plant Communities

The CNDDDB lists one (1) special-status plant communities as being identified within the *Indio* and *La Quinta* quadrangles: Desert Fan Palm Oasis Woodland. This plant community was not observed on-site. Based on the results of the field investigation, no special-status plant communities were observed on-site. Therefore, no special-status plant communities will be impacted by project implementation.

Critical Habitat

Under the federal Endangered Species Act, "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. Maintenance of these physical and biological features requires special

management considerations or protection, regardless of whether individuals or the species are present or not. All federal agencies are required to consult with the United States Fish and Wildlife Service (USFWS) regarding activities they authorize, fund, or permit which may affect a federally listed species or its designated Critical Habitat. The purpose of the consultation is to ensure that projects will not jeopardize the continued existence of the listed species or adversely modify or destroy its designated Critical Habitat. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing is on federal lands, uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highways Administration or a CWA Permit from the Corps). If there is a federal nexus, then the federal agency that is responsible for providing the funding or permit would consult with the USFWS.

The project site is not located with federally designated Critical Habitat (refer to Exhibit 6, *Critical Habitat*, in Attachment A). The nearest designated Critical Habitat to the site is located approximately 2.9 miles to the west for peninsular bighorn sheep (*Ovis canadensis nelsoni*). Therefore, the loss or adverse modification of Critical Habitat will not occur as a result of the proposed project and consultation with the USFWS will not be required for implementation of the proposed project.

Coachella Valley MSHCP

The proposed project was reviewed to determine consistency with the CVMSHCP. Geographic Information System (GIS) software was utilized to map the project site in relation to the CVMSHCP including conservation areas, corridors and linkages, and sand transport areas. The CVMSHCP requires that local permittees, such as the City of Rancho Mirage, comply with various protective measures for covered species, communities, essential ecological processes, and biological corridors. In addition, certain projects may be subject to local development mitigation fees, a Joint Project Review Process, or other conservation or implementation measures.

The project site is located within the boundaries of the CVMSHCP Area, but is not located within any Conservation Areas, Preserves, Cores, or Linkages (refer to Exhibit 7, *CVMSHCP Conservation Areas* in Attachment A). The proposed project is not listed as a planned “Covered Activity” under the published CVMSHCP but is still considered to be a current Covered Activity pursuant to Section 7.1 of the CVMSHCP. According to Section 7.1 of the CVMSHCP, take authorization will be provided for certain activities that take place outside of Conservation Areas including “*new projects approved pursuant to county and city general plans, transportation improvement plans for roads in addition to those addressed in Section 7.2, master drainage plans, capital improvement plans, water and waste management plans, the County’s adopted Trails Master Plan, and other plans adopted by the Permittees.*”

As a Covered Activity located outside designated conservation areas, construction of the proposed project is expected to be consistent with the applicable avoidance, minimization, and mitigation measures described in Section 4.4 of the CVMSHCP. Since the proposed project is considered a Covered Activity under Section 7.1 of the CVMSHCP, no further avoidance, minimization, and mitigation measures are required, and the project is in compliance with the CVMSHCP.

Conclusion

Based literature review and field survey, and existing site conditions discussed in this report, implementation of the project is not expected to have no significant impacts on federally or State listed

species known to occur in the general vicinity of the project site. Additionally, the project will have no effect on designated Critical Habitat or regional wildlife corridors/linkage because none exists within the area. No jurisdictional drainage and/or wetland features were observed on the project site during the field investigation. With completion of the recommendations provided below, no impacts to year-round, seasonal, or special-status avian residents or special-status species will occur from implementation of the proposed project.

As a Covered Activity located outside designated conservation areas, construction of the proposed project is expected to implement the applicable regulatory compliance measures described in Section 4.4 of the CVMSHCP. With implementation of these measures, the proposed project would be fully consistent with the biological goals and objectives of the CVMSHCP.

Recommendations

Burrowing Owl Focused Presence/Absence Survey

The Project site supports suitable foraging habitat and suitable burrows for burrowing owl. In order to ensure no burrowing owl occur onsite, focused surveys for burrowing owl will need to be conducted during the breeding season. Focused surveys will conform to the protocol detailed in the 2012 CDFW Staff Report on Burrowing Owl Mitigation. The survey will consist of at least four (4) visits, with at least one site visit between February 15 and April 15, with a minimum of three surveys, at three weeks apart between April 15 and July 15, with at least one survey after June 15. A qualified wildlife biologist will survey the entire project site by walking transects in suitable habitat and in areas within 150 meters (500 feet) of the limits of disturbance, as applicable based on topography, access and site conditions. Walking transects will be spaced approximately 10 meters (33 feet) apart or less to ensure 100% visual coverage of all areas.

If no burrowing owls are documented onsite during the focused survey, a pre-construction clearance survey will need to be conducted prior to the start of ground disturbing activities to ensure burrowing owl remain absent from the project site.

Although not anticipated, if burrowing owl are found onsite during the focused surveys, coordination will need to occur with the CDFW to determine if avoidance and minimization measures can be implemented to avoid any direct or indirect impacts to burrowing owl, or if an Incidental Take Permit Under Section 2081 of the CESA will need to be prepared and approved by CDFW.

Burrowing Owl Pre-Construction Clearance Survey

To ensure burrowing owl are absent from the project site, a pre-construction burrowing owl clearance survey is recommended to be conducted following the regulations in the CDFW 2012 Staff report on Burrowing Owl.

Pre-Construction Focused Bat Survey

Potential impacts to foraging habitat for bat species would be mitigated to a level of less than significant following implementation of Mitigation Measure.

Prior to implementation of project activities, a qualified biologist shall be retained to determine whether potential roosting sites for bats may be affected. For large ornamental trees and palms suitable for bat

roosting/nursery, exit counts and acoustic surveys shall be performed prior to initial ground disturbance, vegetation or structure removal to determine whether the project site and a 300-foot buffer supports a nursery or roost, and by which species. This work will occur between late -spring and late summer and/or in the fall (generally mid-March through late October).

If the results of the bat survey find a total of a single roosting individual of a special status bat species or 25 or more individuals of a non-special status bat species with potential to be present in the project site (i.e., hoary bat, western yellow bat), a Bat Management Plan shall be developed to ensure mortality to bats does not occur. For each location confirmed to be occupied by bats, the plan will provide details both in text and graphically where exclusion devices/and or staged tree removal will need to occur, the timing for exclusion work and the timeline and methodology needed to exclude the bats. The plan will need to be reviewed and approved by CDFW prior to disturbance of the roosts

Migratory Bird Treaty Act and Fish and Game Code

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season.

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Please do not hesitate to contact Tom McGill at (951) 285-6014 or tmcgill@elmtconsulting.com or Travis McGill at (909) 816-1646 or travismcgill@elmtconsulting.com should you have any questions.

Sincerely,



Thomas J. McGill, Ph.D. | Managing Director



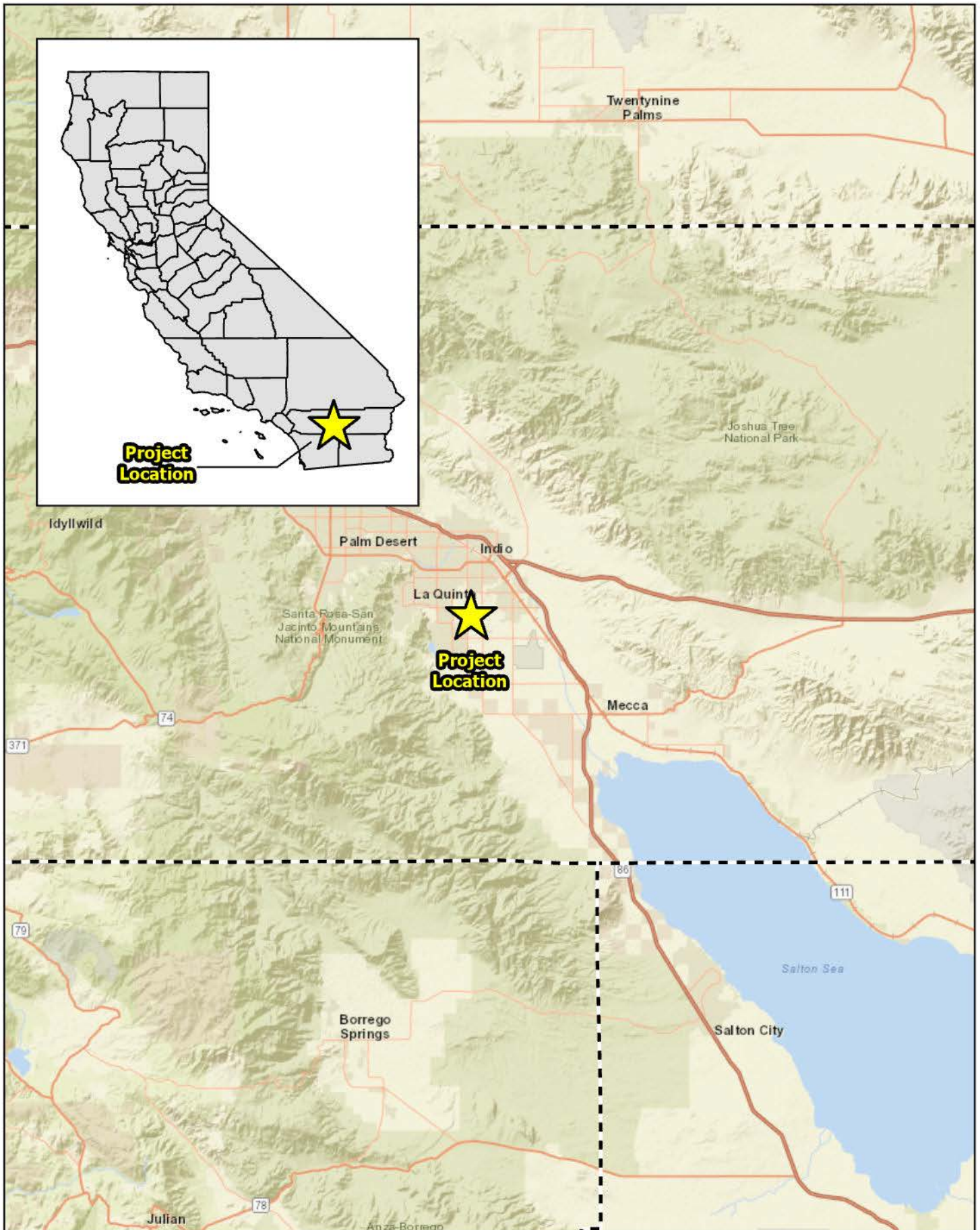
Travis J. McGill | Director

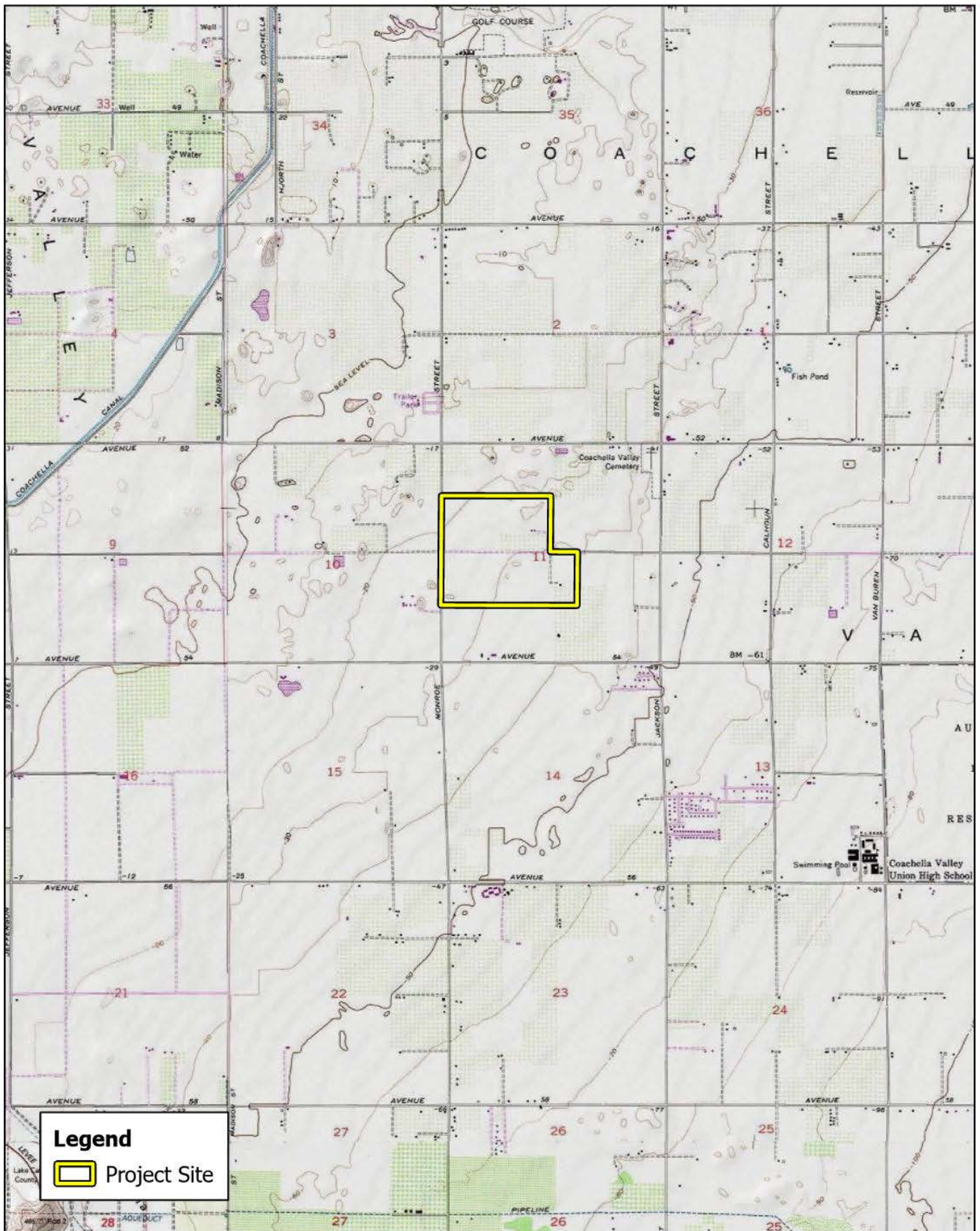
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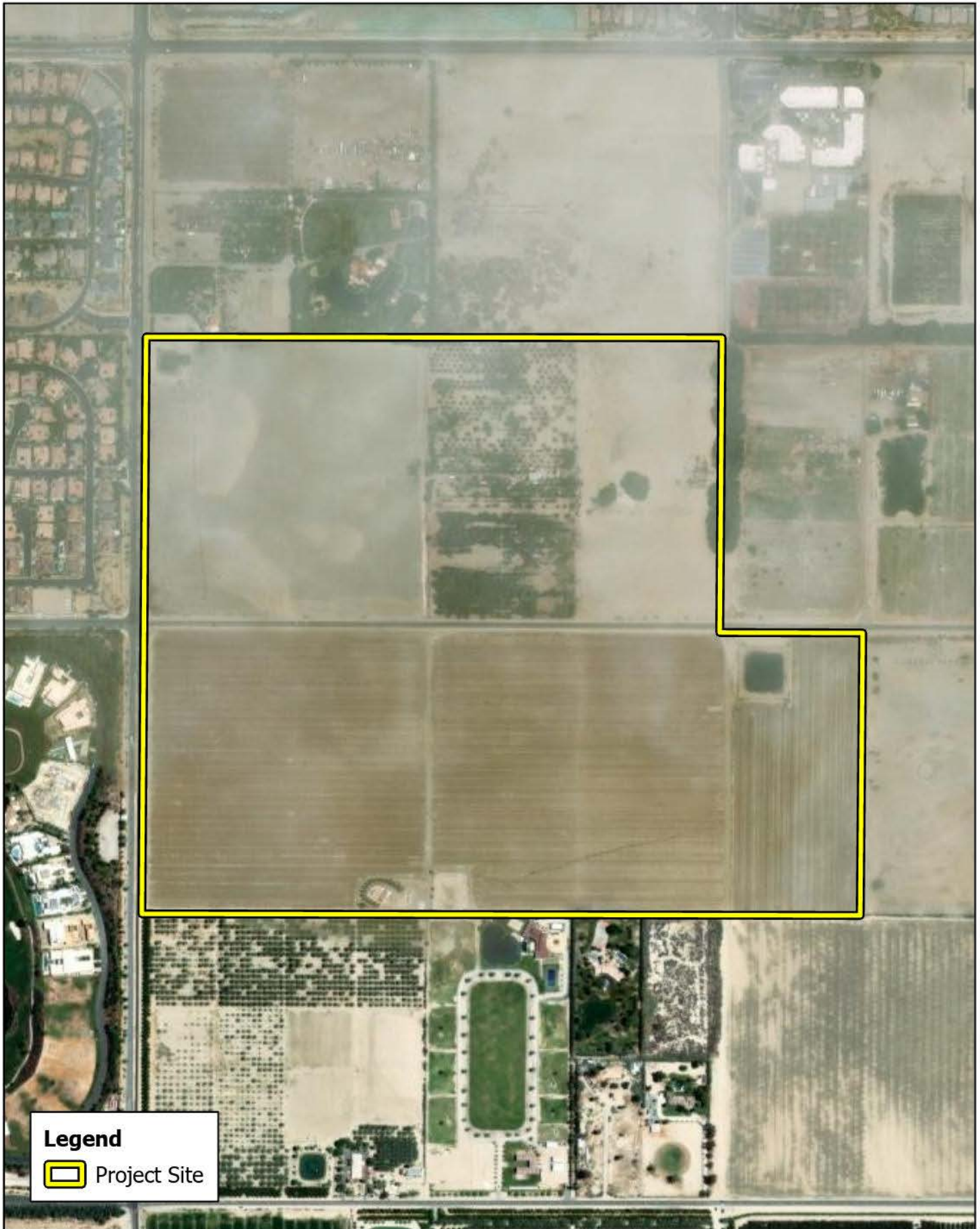
- A. *Project Exhibits*
- B. *Site Photographs*
- C. *Potentially Occurring Special-Status Biological Resources*
- D. *Regulations*
- E. *Site Plan*

Attachment A

Project Exhibits

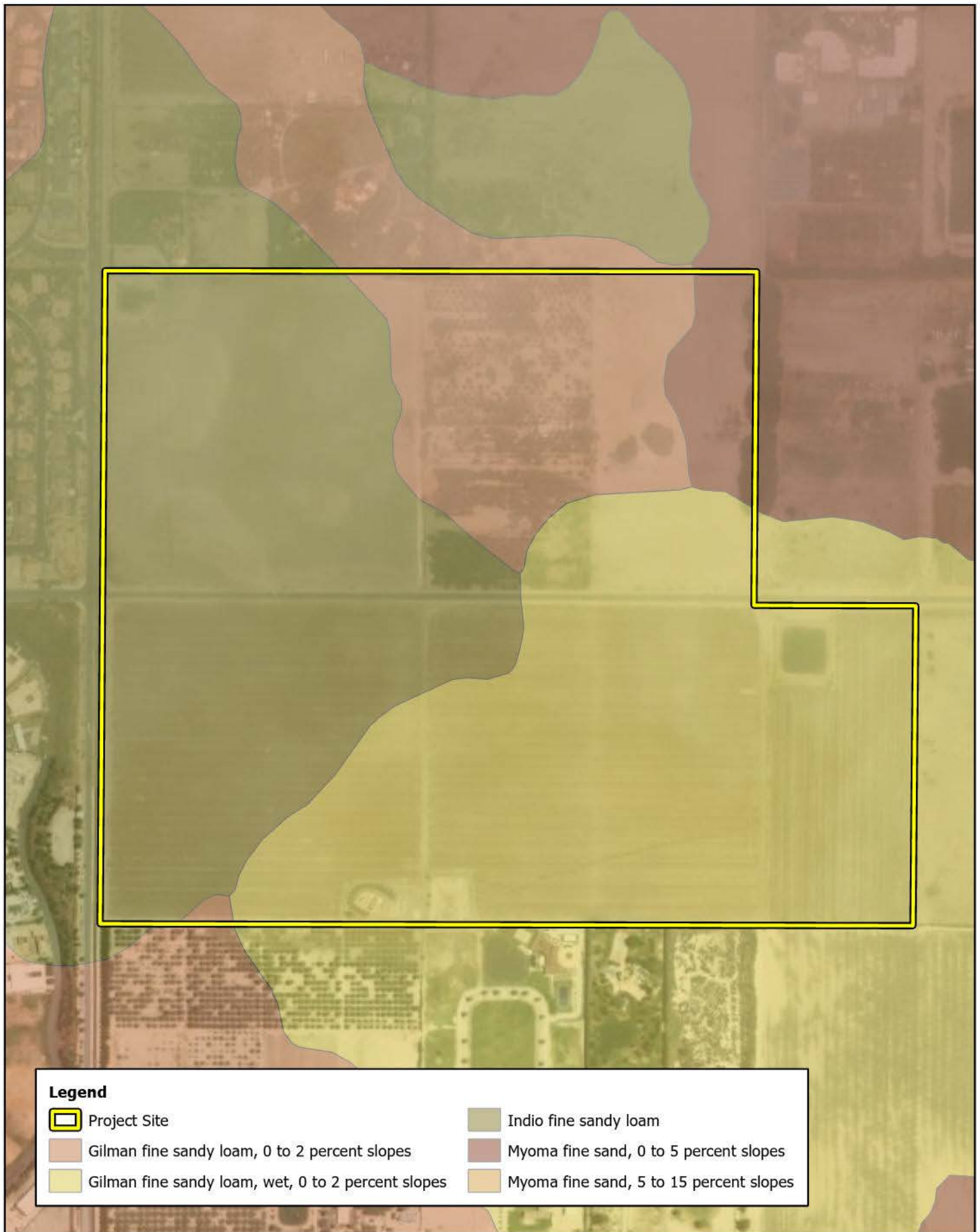


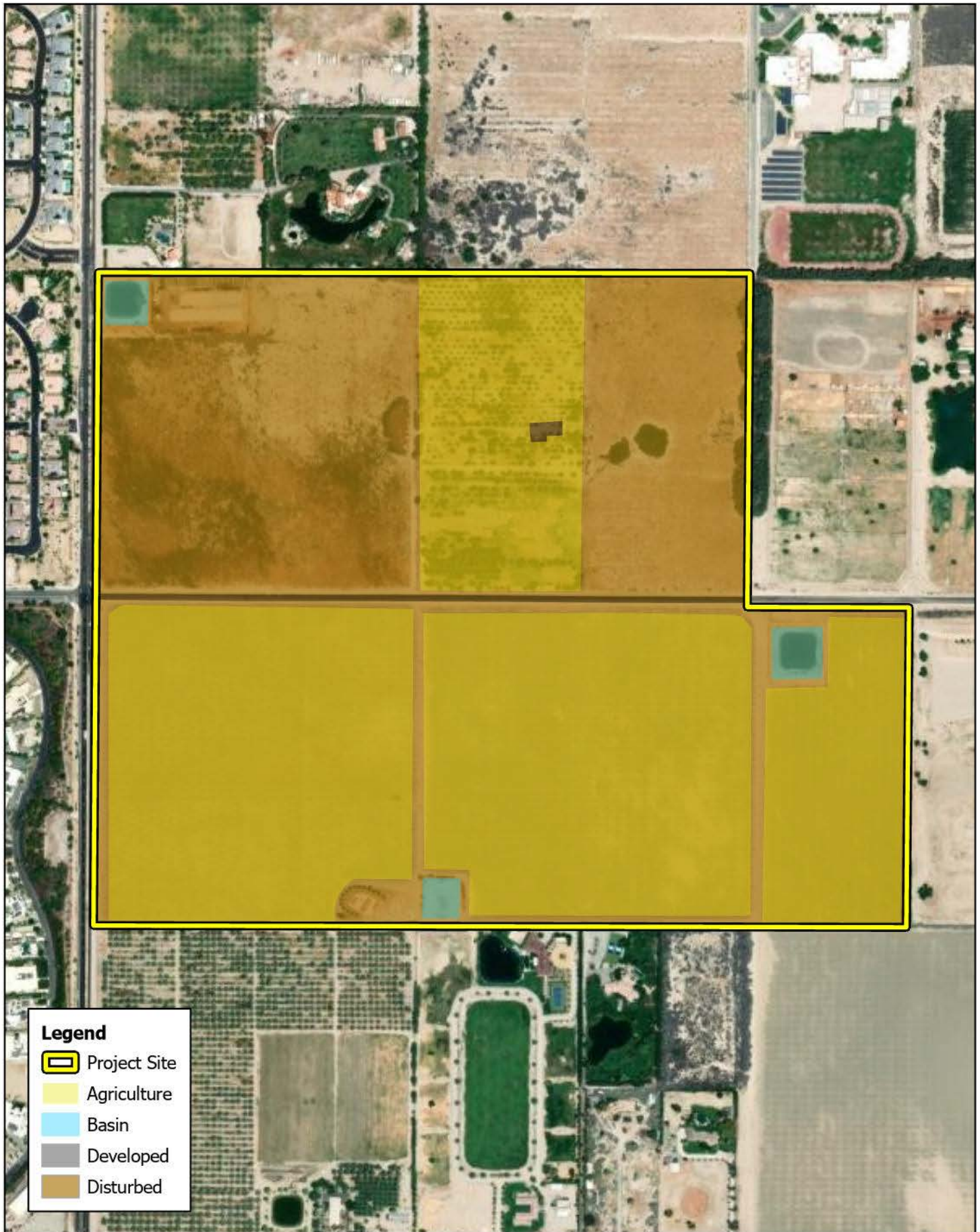


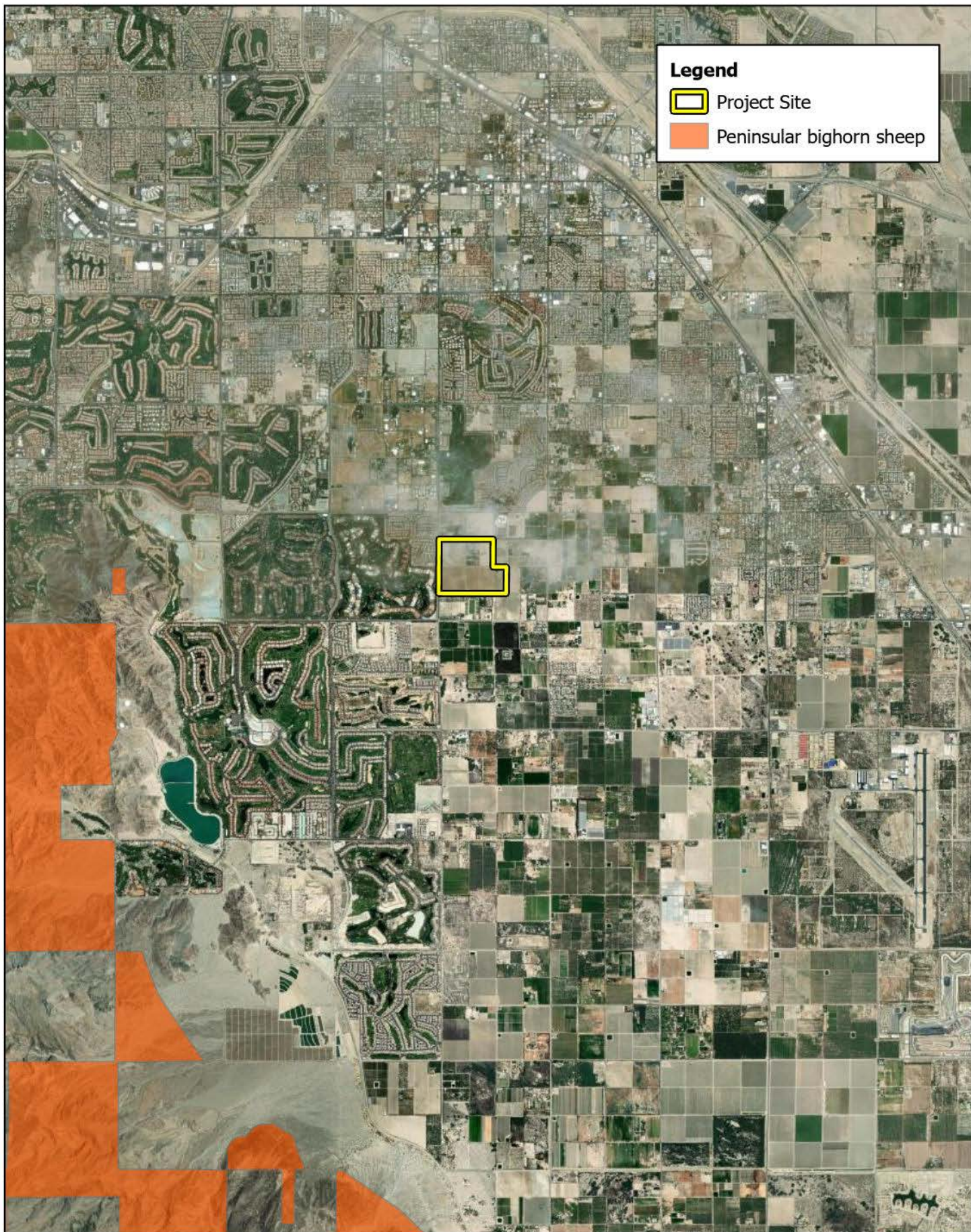


Legend

 Project Site



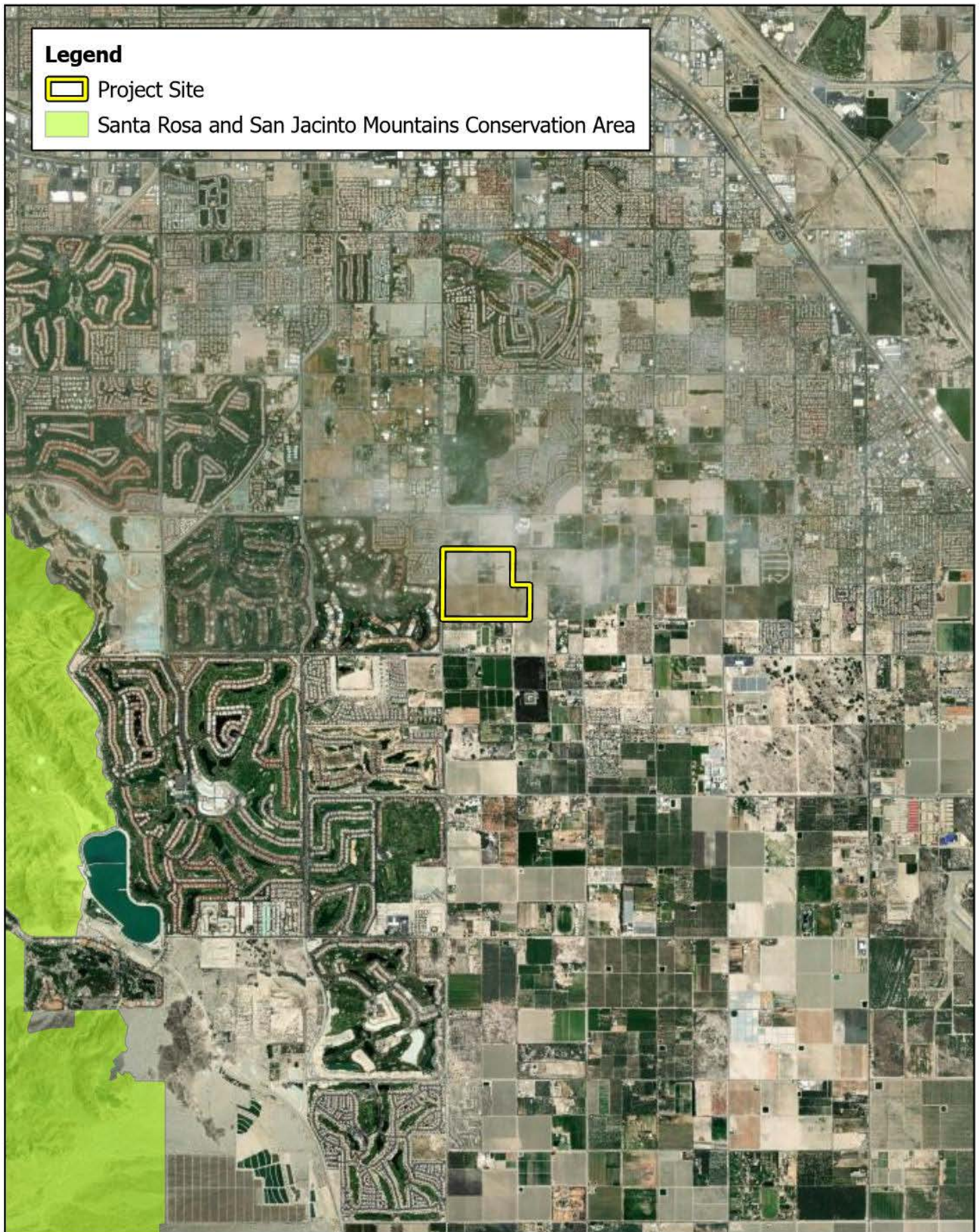




Legend

 Project Site

 Peninsular bighorn sheep



Legend



Project Site



Santa Rosa and San Jacinto Mountains Conservation Area



Attachment B

Site Photographs



Photograph 1: From the northwest corner of the project site, looking east along the northern boundary.



Photograph 2: From the northwest corner of the project site, looking south along the western boundary.



Photograph 3: From the northeast corner of the project site, looking west along the northern boundary.



Photograph 4: From the northeast corner of the project site, looking south along the eastern boundary.



Photograph 5: From the middle of the eastern boundary, looking northwest through the northern parcels.



Photograph 6: From the middle of the eastern boundary, looking southeast through the project site.



Photograph 7: From the southwest corner of the project site, looking north along the western boundary.



Photograph 8: From the southwest corner of the project site, looking east along the southern boundary.

Attachment C

Potentially Occurring Special-Status Biological Resources

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

Scientific Name Common Name	Status	Habitat	Observed Onsite	Potential to Occur
SPECIAL-STATUS WILDLIFE SPECIES				
<i>Accipiter cooperii</i> Cooper's hawk	Fed: None CA: WL CVMSHCP: Not Covered	Generally found in forested areas up to 3,000 feet in elevation, especially near edges and rivers. Prefers hardwood stands and mature forests but can be found in urban and suburban areas where there are tall trees for nesting. Common in open areas during nesting season.	No	Moderate Suitable foraging habitat is present on-site.
<i>Anodonta californiensis</i> California floater	USFWS: None CDFW: None CVMSHCP: Not Covered	Found in lakes and lake-like stream environments at low altitudes.	No	Presumed Absent There is no suitable habitat within or adjacent to the project site.
<i>Antrozous pallidus</i> pallid bat	Fed: None CA: SSC CVMSHCP: Not Covered	Locally common species of low elevation in California. Occurs in grasslands, shrublands, woodlands, and forests from sea level up through mixed conifer forests. Most common in open, dry habitats with rocky areas for roosting, but will also roost in caves, crevices, mines, hollow trees, and buildings.	No	Presumed Absent There is no suitable habitat within or adjacent to the project site.
<i>Aquila chrysaetos</i> golden eagle	Fed: None CA: FP WL CVMSHCP: Not Covered	Occupies nearly all terrestrial habitats of the western states except densely forested areas. Favors secluded cliffs with overhanging ledges and large trees for nesting and cover. Hilly or mountainous country where takeoff and soaring are supported by updrafts is generally preferred to flat habitats. Deeply cut canyons rising to open mountain slopes and crags are ideal habitat.	No	Presumed Absent There is no suitable habitat within or adjacent to the project site.
<i>Athene cunicularia</i> burrowing owl	Fed: None CA: SSC CVMSHCP: Covered	Primarily a grassland species, but it persists and even thrives in some landscapes highly altered by human activity. Occurs in open, annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. The overriding characteristics of suitable habitat appear to be burrows for roosting and nesting and relatively short vegetation with only sparse shrubs and taller vegetation.	No	Moderate The project site provides line-of-sight opportunities favored by this species. Suitable burrows were observed onsite, but there is a high level of human activity.
<i>Buteo regalis</i> ferruginous hawk	USFWS: None CDFW: WL CVMSHCP: Not Covered	Common winter resident of grasslands and agricultural areas in southwestern California. Frequents open grasslands, sagebrush flats, desert scrub, low foothills surrounding valleys, and fringes of pinyon-juniper habitats. Does not breed in California.	No	Presumed Absent There is no suitable habitat within or adjacent to the project site.

Scientific Name Common Name	Status	Habitat	Observed Onsite	Potential to Occur
<i>Chaetodipus fallax pallidus</i> pallid San Diego pocket mouse	Fed: None CA: None CVMSHCP: Not Covered	Common resident of sandy herbaceous areas, usually in association with rocks or coarse gravel in southwestern California. Occurs mainly in arid coastal and desert border areas. Habitats include coastal scrub, chamise-redshank chaparral, mixed chaparral, sagebrush, desert wash, desert scrub, desert succulent shrub, pinyon-juniper, and annual grassland.	No	Presumed Absent There is no suitable habitat within or adjacent to the project site.
<i>Coleonyx variegatus abbotti</i> San Diego banded gecko	USFWS: None CDFW: SSC CVMSHCP: Not Covered	Prefers rocky areas in coastal sage and chaparral within granite or rocky outcrops. Occurs in coastal and cismontane southern California from interior Ventura Co. south.	No	Presumed Absent There is no suitable habitat within or adjacent to the project site.
<i>Crotalus ruber</i> red-diamond rattlesnake	Fed: None CA: SSC CVMSHCP: Not Covered	It can be found from the desert, through dense chaparral in the foothills (it avoids the mountains above around 4,000 feet), to warm inland mesas and valleys, all the way to the cool ocean shore. It is most commonly associated with heavy brush with large rocks or boulders. Dense chaparral in the foothills, cactus or boulder associated coastal sage scrub, oak and pine woodlands, and desert slope scrub associations are known to carry populations of the northern red-diamond rattlesnake; however, chamise and red shank associations may offer better structural habitat for refuges and food resources for this species than other habitats.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Cyprinodon macularius</i> desert pupfish	Fed: END CA: END CVMSHCP: Covered	In California, this species historically occurred in several springs, seeps and slow-moving streams in the Salton Sink Basin, as well as in backwaters and sloughs along the lower Colorado River. Now relegated to remnants of their former habitats, which generally are too harsh for most introduced species to exist.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Dinacoma caseyi</i> Casey's June beetle	Fed: END CA: None CVMSHCP: Not Covered	All <i>Dinacoma</i> populations are associated with alluvial sediments occurring in or contiguous with bases of desert alluvial fans, and the broad, gently sloping, depositional surfaces at the base of the Santa Rosa mountain ranges in the dry Coachella valley region. Most commonly associated with the Carsitas series soil.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Dipodomys merriami collinus</i> earthquake Merriam's kangaroo rat	Fed: None CA: None CVMSHCP: Not Covered	Typically found in Riversidean alluvial fan sage scrub habitat, but may also be found in Riversidean sage scrub, chaparral and grassland vegetation in adjacent to upland areas. Often associated with sandy-loam soils that are common throughout the designated core drainages.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.

Scientific Name Common Name	Status	Habitat	Observed Onsite	Potential to Occur
<i>Eumops perotis californicus</i> western mastiff bat	USFWS: None CDFW: SSC CVMSHCP: Not Covered	Occurs in open, semi-arid to arid habitats including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces, high buildings, trees, and tunnels.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Euparagia unidentata</i> Algodones euparagia	USFWS: None CDFW: None CVMSHCP: Not Covered	Scavenges dead insects in sandy areas to feed larvae. Adults nectar primarily on <i>Croton</i> sp., upon which it is closely reliant.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Falco mexicanus</i> prairie falcon	Fed: None CA: WL CVMSHCP: Not Covered	Commonly occur in arid and semiarid shrubland and grassland community types. Also occasionally found in open parklands within coniferous forests. During the breeding season, they are found commonly in foothills and mountains which provide cliffs and escarpments suitable for nest sites.	No	Moderate Suitable foraging habitat is present on-site, but the site lacks suitable nesting opportunities.
<i>Falco peregrinus anatum</i> American peregrine falcon	USFWS: Delisted CDFW: Delisted CVMSHCP: Not Covered	Uncommon winter resident of the inland region of southern California. Active nesting sites are known along the coast north of Santa Barbara, in the Sierra Nevada, and in other mountains of northern California. Breeds mostly in woodland, forest, and coastal habitats. Riparian areas and coastal and inland wetlands are important habitats yearlong, especially in nonbreeding seasons.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Gopherus agassizii</i> desert tortoise	Fed: THR CA: THR CVMSHCP: Covered	Widely distributed in the Mojave, Sonoran, and Colorado deserts from below sea level to 7,220 feet. Most common in desert scrub, desert wash, and Joshua tree habitats, but occurs in almost every desert habitat except those on the most precipitous slopes.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Hesperopsis graciellae</i> MacNeill's sootywing	USFWS: None CDFW: None CVMSHCP: Not Covered	Found along riparian or otherwise moist areas within arid regions. Larvae are dependent upon <i>Atriplex lentiformes</i> .	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Lasiurus xanthinus</i> western yellow bat	Fed: None CA: SSC CVMSHCP: Covered	Roosts in palm trees in foothill riparian, desert wash, and palm oasis habitats with access to water for foraging.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Lithobates yavapaiensis</i> Lowland leopard frog	USFWS: Delisted CDFW: SSC CVMSHCP: Not Covered	Occurs in temperate forests, rivers, intermittent rivers, freshwater lakes, and freshwater marshes.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Macrobaenetes valgum</i> Coachella giant sand treader cricket	Fed: None CA: None CVMSHCP: Covered	Nocturnal and moisture sensitive insects. Emergence occurs with winter rains and appear at maximum densities in January-February. Can be detected via their characteristic delta-shaped burrow excavations.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.

Scientific Name Common Name	Status	Habitat	Observed Onsite	Potential to Occur
<i>Melozone aberti</i> Abert's towhee	Fed: None CA: None CVMSHCP: Not Covered	Found year-round in dense desert brush along rivers and streams in the Sonoran Desert, particularly in the understory of cottonwood-willow riparian woodland and mesquite bosques.	No	Presumed Absent There is no suitable habitat present within or adjacent to the project site.
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	Fed: None CA: SSC CVMSHCP: Not Covered	Occurs in coastal scrub communities between San Luis Obispo and San Diego Counties. Prefers moderate to dense canopies, and especially rocky outcrops.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Nyctinomops femorosaccus</i> pocketed free-tailed bat	Fed: None CA: SSC CVMSHCP: Covered	Often found in pinyon-juniper woodlands, desert scrub, desert succulent shrub, desert riparian, desert wash, alkali desert scrub, Joshua tree, and palm oasis. Roosts in caves, tunnels, mines, and rock crevices, usually in large colonies.	No	Presumed Absent There is no suitable habitat present within or adjacent to the project site.
<i>Oliarces clara</i> cheeseweed owlfly	Fed: None CA: None CVMSHCP: Not Covered	Occur on or near bajadas, adults aggregate at local high topographic features to mate.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Ovis canadensis nelsoni</i> pop. 2 Peninsular bighorn sheep DPS	Fed: END CA: THR; FP CVMSHCP: Covered	Preferred habitat is near mountainous terrain above the desert floor that is visually open, as well as steep and rocky. Most Mojave Desert mountain ranges satisfy these requirements well. Surface water is another element that is considered important to population health. Found mainly in the Peninsular Ranges.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Perognathus longimembris bangsi</i> Palm Springs pocket mouse	Fed: None CA: SSC CVMSHCP: Covered	Inhabits areas having flat to gently sloping topography, sparse to moderate vegetative cover, and loosely packed or sandy soils on slopes ranging from 0% to approximately 15%. Remaining habitat in the Coachella Valley and environs is about 142,000 acres.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Phrynosoma mcallii</i> flat-tailed horned lizard	Fed: None CA: SSC CVMSHCP: Covered	Typical habitat is sandy desert hardpan or gravel flats with scattered sparse vegetation of low species diversity. Most common in areas with high density of harvester ants and fine windblown sand, but rarely occurs on dunes.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Piranga rubra</i> summer tanager	Fed: None CA: SSC CVMSHCP: Covered	Breed in gaps and edges of open deciduous or pine-oak forests across the southern and mid-Atlantic U.S. Uncommon (formerly common) summer resident and breeder in desert riparian habitat along lower Colorado River. Breeds in mature, desert riparian habitat dominated by cottonwoods and willows.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Poliophtila melanura</i> black-tailed gnatcatcher	Fed: None CA: WL CVMSHCP: Not Covered	In Mojave, Great Basin, Colorado and Sonoran desert communities, prefers nesting and foraging in densely lined arroyos and washes dominated by creosote bush and salt bush with scattered bursage, burrowed, ocotillo, saguaro, barrel cactus, nipple cactus, and prickly pear and cholla.	No	Low Minimal habitat within or adjacent to the project site.

Scientific Name Common Name	Status	Habitat	Observed Onsite	Potential to Occur
<i>Pyrocephalus rubinus</i> vermillion flycatcher	USFWS: None CDFW: SSC CVMSHCP: Not Covered	Occupies desert riparian habitat, particularly cottonwoods, willows, mesquite, and other large desert riparian trees, in habitat adjacent to irrigated fields, irrigation ditches, pastures, and other open, mesic areas where it can forage.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Rallus obsoletus yumanensis</i> Yuma Ridgeway's rail	USFWS: END CDFW: THR ; FP CVMSHCP: Not Covered	Nests in freshwater marches along the Colorado River and Salton Sea. Prefers stands of cattails and tules dissected by narrow channels of flowing water.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Taxidea taxus</i> American badger	USFWS: None CDFW: SSC CVMSHCP: Not Covered	Primarily occupy grasslands, parklands, farms, tallgrass and shortgrass prairies, meadows, shrub-steppe communities and other treeless areas with sandy loam soils where it can dig more easily for its prey. Occasionally found in open chaparral (with less than 50% plant cover) and riparian zones.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Toxostoma crissale</i> Crissal thrasher	Fed: None CA: SSC CVMSHCP: Covered	Year round resident in California. Occupies a relatively large variety of desert riparian and scrub habitats from below sea level to over 6,000 feet. The common factor, regardless of habitat type and species of shrub, is dense, low scrubby vegetation. Primarily occupies riparian scrub or woodland at lower elevations.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Toxostoma lecontei</i> Le Conte's thrasher	Fed: None CA: SSC CVMSHCP: Covered	An uncommon to rare, local resident in southern California deserts from southern Mono Co. south to the Mexican border, and in western and southern San Joaquin Valley. Occurs primarily in open desert wash, desert scrub, alkali desert scrub, and desert succulent shrub habitats; also occurs in Joshua tree habitat with scattered shrubs.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Uma inornata</i> Coachella Valley fringe-toed lizard	Fed: THR CA: END CVMSHCP: Covered	Sparsely-vegetated arid areas with fine wind-blown sand, including dunes, washes, and flats with sandy hummocks formed around the bases of vegetation. Needs fine, loose sand for burrowing.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Vireo bellii pusillus</i> least Bell's vireo	Fed: END CA: END CVMSHCP: Covered	Primarily occupy Riverine riparian habitat that typically feature dense cover within 1 -2 meters of the ground and a dense, stratified canopy. Typically it is associated with southern willow scrub, cottonwood-willow forest, mule fat scrub, sycamore alluvial woodlands, coast live oak riparian forest, arroyo willow riparian forest, or mesquite in desert localities. It uses habitat which is limited to the immediate vicinity of water courses, 2,000 feet elevation in the interior.	No	Presumed Absent There is no suitable habitat present within or adjacent to the project site.
<i>Xanthocephalus xanthocephalus</i> yellow-headed blackbird	USFWS: None CDFW: SSC CVMSHCP: Not Covered	Occurs in freshwater emergent wetlands, and moist, open areas along croplands and mud flats of lacustrine habitats. Prefers to nest in dense wetland vegetation characterized by tules, cattails, or other similar plant species along the border of lakes and ponds.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.

Scientific Name Common Name	Status	Habitat	Observed Onsite	Potential to Occur
<i>Xerospermophilus tereticaudus chlorus</i> Palm Springs round-tailed ground squirrel	Fed: None CA: SSC CVMSHCP: Covered	Inhabits sandy arid regions of Lower Sonoran Life Zone. Its scrub and wash habitats include mesquite and creosote dominated sand dunes, creosote bush scrub, creosote palo verde and saltbush/alkali scrub.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
SPECIAL-STATUS PLANT SPECIES				
<i>Abronia villosa</i> var. <i>aurita</i> chaparral sand-verbena	Fed: None CA: None CNPS: 1B.1 CVMSHCP: Not Covered	Found on the coastal side of the southern California mountains in chaparral and coastal sage scrub plant communities in areas of full sun and sandy soils. Found at elevations ranging from 262 to 5,249 feet. Blooming period is from January to September.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Astragalus lentiginosus</i> var. <i>cochellae</i> Coachella Valley milk-vetch	Fed: END CA: None CNPS: 1B.2 CVMSHCP: Covered	Preferred habitat includes desert dunes and sandy Sonoran desert scrub. Found at elevations ranging from 131 to 2,149 feet in elevation. Blooming period is from February to May.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Astragalus preussii</i> var. <i>laxiflorus</i> Lancaster milk-vetch	Fed: None CA: None CNPS: 1B.1 CVMSHCP: Not Covered	Occurs on alkaline clay flats, gravelly or sandy washes, and along draws in gullied badlands. Found at elevations up to 2,379 feet. Blooming period is from March to May.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Astragalus sabulorum</i> gravel milk-vetch	Fed: None CA: None CNPS: 2B.2 CVMSHCP: Not Covered	Occurs in sandy and gravelly soils in flats, washes, and roadsides in desert dunes and Mojavean and Sonoran desert scrub. Found at elevations ranging from 98 to 2,936 feet. Blooming period is from February to May.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Chorizanthe leptotheca</i> Peninsular spineflower	Fed: None CA: None CNPS: 4.2 CVMSHCP: Not Covered	Found in granitic soils within chaparral, coast scrub, and lower montane coniferous forest habitats. Found at elevations ranging from 984 to 6,234 feet. Blooming period is from May to August.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Ditaxis claryana</i> glandular ditaxis	Fed: None CA: None CNPS: 2B.2 CVMSHCP: Not Covered	Found in sandy soils in dry washes and rocky hillsides within Mojavean and Sonoran desert scrub. Occurs at elevations ranging from 0 to 1,525 feet. Blooming period is October and December through March.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Ditaxis serrata</i> var. <i>californica</i> California ditaxis	Fed: None CA: None CNPS: 3.2 CVMSHCP: Not Covered	Found in Sonoran desert scrub. Occurs at elevations ranging from 98 to 3,281 feet. Blooming period is from March to December.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Horsfordia alata</i> pink velvet-mallow	Fed: None CA: None CNPS: 4.3 CVMSHCP: Not Covered	Occurs in rocky Sonoran desert scrub. Found at elevations ranging from 328 to 1,640 feet. Blooming period is from February to December.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.

Scientific Name Common Name	Status	Habitat	Observed Onsite	Potential to Occur
<i>Horsfordia newberryi</i> Newberry's velvet-mallow	Fed: None CA: None CNPS: 4.3 CVMSHCP: Not Covered	Occurs in rocky Sonoran desert scrub. Found at elevations ranging from 10 to 2,624 feet. Blooming period includes February, April, November, and December.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Johnstonella costata</i> ribbed cryptantha	Fed: None CA: None CNPS: 4.3 CVMSHCP: Not Covered	Grows in sandy soils within desert dunes, Mojavean desert scrub, and Sonoran desert scrub habitats, often in ephemeral areas. Found at elevations ranging from 197 to 1,640 feet. Blooming period is from February to May.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Johnstonella holoptera</i> winged cryptantha	Fed: None CA: None CNPS: 4.3 CVMSHCP: Not Covered	Found in Mojavean desert scrub and Sonoran desert scrub habitats. Found at elevations ranging from 328 to 5,545 feet. Blooming period is from March to April.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Juncus acutus ssp. leopoldii</i> southwestern spiny rush	Fed: None CA: None CNPS: 4.2 CVMSHCP: Not Covered	Found in coastal dunes (mesic), meadows and seeps (alkaline), and marshes and swamps (coastal salt). Found at elevations ranging from 0 to 3,115 feet. Blooming period is from May to June.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Marina orcuttii var. orcuttii</i> California marina	Fed: None CA: None CNPS: 1B.3 CVMSHCP: Not Covered	Occurs in rocky soils in chaparral, pinyon-juniper woodland, and Sonoran desert scrub. Found at elevations ranging from 3,444 to 3,805 feet. Blooming period is from May to October.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Matelea parvifolia</i> spear-leaf matelea	Fed: None CA: None CNPS: 2B.3 CVMSHCP: Not Covered	Occurs in rocky soils in Mojavean and Sonoran desert scrub. Found at elevations ranging from 1,443 to 3,593 feet. Blooming period is typically March to May and can last through July.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Nemacaulis denudata var. gracilis</i> slender cottonheads	Fed: None CA: None CNPS: 2B.2 CVMSHCP: Not Covered	Occurs in coastal dunes, desert dunes, and Sonoran desert scrub habitats. Found at elevations ranging from 164 to 1,312 feet. Blooming period is from March to May.	No	Presumed Absent No suitable habitat is present within or adjacent to the project site.
<i>Pseudorontium cyathiferum</i> Deep Canyon snapdragon	Fed: None CA: None CNPS: 2B.3 CVMSHCP: Not Covered	Occurs in rocky Sonoran desert scrub. Found at elevations ranging from 0 to 2,624 feet. Blooming period is from February to April.	No	Presumed Absent There is no suitable habitat within or adjacent to the project site.
<i>Selaginella eremophila</i> desert spike-moss	Fed: None CA: None CNPS: 2B.2 CVMSHCP: Not Covered	Found in chaparral and Sonoran desert scrub habitats within gravelly or rocky soil. Found at elevations ranging from 656 to 2,953 feet. Blooming period is from May to July.	No	Presumed Absent The project site is outside of the typical known elevation for this species.
<i>Stemodia durantifolia</i> purple stemodia	Fed: None CA: None CNPS: 2B.1 CVMSHCP: Not Covered	Occurs in Sonoran desert scrub habitats. Found at elevations ranging from 591 to 984 feet. Blooming period is from January to December.	No	Presumed Absent The project site is outside of the typical known elevation for this species.

Scientific Name Common Name	Status	Habitat	Observed Onsite	Potential to Occur
<i>Stuckenia striata</i> Broadleaf pondweed	Fed: None CA: None CNPS: 2B.3 CVMSHCP: Not Covered	Occurs in marshes, swamps, lakes, ponds, rivers, and drainage canals. Found at elevations ranging between 230 to 7000 feet.	No	Presumed Absent The project site is outside of the typical known elevation for this species.
CDFW SENSITIVE HABITATS				
Desert Fan Palm Oasis Woodland	CDFW Sensitive Habitat	Rare plant community that is one of the most unusual biological resources located within the Coachella Valley. Found within canyons and along the San Andreas Fault Zone, where water occurs naturally. Generally characterized by open to dense groves of native desert fan palms, which are the most massive native palm in North America, growing more than 66 feet.	No	Absent

U.S. Fish and Wildlife Service (Fed) - Federal

END – Federal Endangered
THR – Federal Threatened

California Department of Fish and Wildlife (CA) - California

END – California Endangered
THR – California Threatened
FP – California Fully Protected
CSC – California Species of Special Concern
WL – California Watch List

California Native Plant Society (CNPS)**California Rare Plant Rank**

1B Plants Rare, Threatened, or Endangered in California and Elsewhere
2B Plants Rare, Threatened, or Endangered in California, but More Common Elsewhere
3 More Information Needed
4 Plants of Limited Distribution – A Watch List

Threat Ranks

0.1- Seriously threatened in California
0.2- Moderately threatened in California
0.3- Not very threatened in California

Attachment D

Regulations

Special status species are native species that have been afforded special legal or management protection because of concern for their continued existence. There are several categories of protection at both federal and state levels, depending on the magnitude of threat to continued existence and existing knowledge of population levels.

Federal Regulations

Endangered Species Act of 1973

Federally listed threatened and endangered species and their habitats are protected under provisions of the Federal Endangered Species Act (ESA). Section 9 of the ESA prohibits “take” of threatened or endangered species. “Take” under the ESA is defined as to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any of the specifically enumerated conduct.” The presence of any federally threatened or endangered species that are in a project area generally imposes severe constraints on development, particularly if development would result in “take” of the species or its habitat. Under the regulations of the ESA, the United States Fish and Wildlife Service (USFWS) may authorize “take” when it is incidental to, but not the purpose of, an otherwise lawful act.

Critical Habitat is designated for the survival and recovery of species listed as threatened or endangered under the ESA. Critical Habitat includes those areas occupied by the species, in which are found physical and biological features that are essential to the conservation of an ESA listed species and which may require special management considerations or protection. Critical Habitat may also include unoccupied habitat if it is determined that the unoccupied habitat is essential for the conservation of the species.

Whenever federal agencies authorize, fund, or carry out actions that may adversely modify or destroy Critical Habitat, they must consult with USFWS under Section 7 of the ESA. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highway Administration or a permit from the U.S. Army Corps of Engineers (Corps)).

If USFWS determines that Critical Habitat will be adversely modified or destroyed from a proposed action, the USFWS will develop reasonable and prudent alternatives in cooperation with the federal institution to ensure the purpose of the proposed action can be achieved without loss of Critical Habitat. If the action is not likely to adversely modify or destroy Critical Habitat, USFWS will include a statement in its biological opinion concerning any incidental take that may be authorized and specify terms and conditions to ensure the agency is in compliance with the opinion.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S. Government Code [USC] 703) makes it unlawful to pursue, capture, kill, possess, or attempt to do the same to any migratory bird or part, nest, or egg of any such bird listed in wildlife protection treaties between the United States, Great Britain, Mexico, Japan, and the countries of the former Soviet Union, and authorizes the U.S. Secretary of the Interior to protect and regulate the taking of migratory birds. It establishes seasons and bag limits for hunted species and protects migratory birds, their occupied nests, and their eggs (16 USC 703; 50 CFR 10, 21).

The MBTA covers the taking of any nests or eggs of migratory birds, except as allowed by permit pursuant to 50 CFR, Part 21. Disturbances causing nest abandonment and/or loss of reproductive effort (i.e., killing or abandonment of eggs or young) may also be considered “take.” This regulation seeks to protect migratory birds and active nests.

In 1972, the MBTA was amended to include protection for migratory birds of prey (e.g., raptors). Six families of raptors occurring in North America were included in the amendment: Accipitridae (kites, hawks, and eagles); Cathartidae (New World vultures); Falconidae (falcons and caracaras); Pandionidae (ospreys); Strigidae (typical owls); and Tytonidae (barn owls). The provisions of the 1972 amendment to the MBTA protects all species and subspecies of the families listed above. The MBTA protects over 800 species including geese, ducks, shorebirds, raptors, songbirds and many relatively common species.

State Regulations

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) provides for the protection of the environment within the State of California by establishing State policy to prevent significant, avoidable damage to the environment through the use of alternatives or mitigation measures for projects. It applies to actions directly undertaken, financed, or permitted by State lead agencies. If a project is determined to be subject to CEQA, the lead agency will be required to conduct an Initial Study (IS); if the IS determines that the project may have significant impacts on the environment, the lead agency will subsequently be required to write an Environmental Impact Report (EIR). A finding of non-significant effects will require either a Negative Declaration or a Mitigated Negative Declaration instead of an EIR. Section 15380 of the CEQA Guidelines independently defines “endangered” and “rare” species separately from the definitions of the California Endangered Species Act (CESA). Under CEQA, “endangered” species of plants or animals are defined as those whose survival and reproduction in the wild are in immediate jeopardy, while “rare” species are defined as those who are in such low numbers that they could become endangered if their environment worsens.

California Endangered Species Act (CESA)

In addition to federal laws, the state of California implements the CESA which is enforced by CDFW. The CESA program maintains a separate listing of species beyond the FESA, although the provisions of each act are similar.

State-listed threatened and endangered species are protected under provisions of the CESA. Activities that may result in “take” of individuals (defined in CESA as; “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) are regulated by CDFW. Habitat degradation or modification is not included in the definition of “take” under CESA. Nonetheless, CDFW has interpreted “take” to include the destruction of nesting, denning, or foraging habitat necessary to maintain a viable breeding population of protected species.

The State of California considers an endangered species as one whose prospects of survival and reproduction are in immediate jeopardy. A threatened species is considered as one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the

absence of special protection or management. A rare species is one that is considered present in such small numbers throughout its range that it may become endangered if its present environment worsens. State threatened and endangered species are fully protected against take, as defined above.

The CDFW has also produced a species of special concern list to serve as a species watch list. Species on this list are either of limited distribution or their habitats have been reduced substantially, such that a threat to their populations may be imminent. Species of special concern may receive special attention during environmental review, but they do not have formal statutory protection. At the federal level, USFWS also uses the label species of concern, as an informal term that refers to species which might be in need of concentrated conservation actions. As the Species of Concern designated by USFWS do not receive formal legal protection, the use of the term does not necessarily ensure that the species will be proposed for listing as a threatened or endangered species.

Fish and Game Code

Fish and Game Code Sections 3503, 3503.5, 3511, and 3513 are applicable to natural resource management. For example, Section 3503 of the Code makes it unlawful to destroy any birds' nest or any birds' eggs that are protected under the MBTA. Further, any birds in the orders Falconiformes or Strigiformes (Birds of Prey, such as hawks, eagles, and owls) are protected under Section 3503.5 of the Fish and Game Code which makes it unlawful to take, possess, or destroy their nest or eggs. A consultation with CDFW may be required prior to the removal of any bird of prey nest that may occur on a project site. Section 3511 of the Fish and Game Code lists fully protected bird species, where the CDFW is unable to authorize the issuance of permits or licenses to take these species. Pertinent species that are State fully protected by the State include golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*). Section 3513 of the Fish and Game Code makes it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Native Plant Protection Act

Sections 1900–1913 of the Fish and Game Code were developed to preserve, protect, and enhance Rare and Endangered plants in the state of California. The act requires all state agencies to use their authority to carry out programs to conserve Endangered and Rare native plants. Provisions of the Native Plant Protection Act prohibit the taking of listed plants from the wild and require notification of the CDFW at least ten days in advance of any change in land use which would adversely impact listed plants. This allows the CDFW to salvage listed plant species that would otherwise be destroyed.

California Native Plant Society Rare and Endangered Plant Species

Vascular plants listed as rare or endangered by the CNPS, but which have no designated status under FESA or CESA are defined as follows:

California Rare Plant Rank

- 1A- Plants Presumed Extirpated in California and either Rare or Extinct Elsewhere
- 1B- Plants Rare, Threatened, or Endangered in California and Elsewhere

- 2A- Plants Presumed Extirpated in California, But More Common Elsewhere
- 2B- Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
- 3- Plants about Which More Information is Needed - A Review List
- 4- Plants of Limited Distribution - A Watch List

Threat Ranks

- .1- Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
- .2- Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
- .3- Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known).

Local Policies

Coachella Valley MSHCP

A Multiple Species Habitat Conservation Plan (Plan) was prepared for the entire Coachella Valley and surrounding mountains to address current and potential future state and federal Endangered Species Act issues in the Plan Area. A Memorandum of Understanding (“Planning Agreement”) was developed to govern the preparation of the Plan. In late 1995 and early 1996, under the auspices of CVAG, the cities of Cathedral City, Coachella, Desert Hot Springs, Indian Wells, Indio, La Quinta, Palm Desert, Palm Springs, and Rancho Mirage; County of Riverside (County); U.S. Fish and Wildlife Service (USFWS); California Department of Fish and Game (CDFG); Bureau of Land Management (BLM); U.S. Forest Service (USFS); and National Park Service (NPS) signed the Planning Agreement to initiate the planning effort. Subsequently, Caltrans, Coachella Valley Water District (CVWD), Imperial Irrigation District (IID), Riverside County Flood Control and Water Conservation District (County Flood Control), Riverside County Regional Park and Open Space District (County Parks), Riverside County Waste Resources Management District (County Waste), California Department of Parks and Recreation (State Parks), and CVMC decided to participate in the Plan.

The Plan balances environmental protection and economic development objectives in the Plan Area and simplifies compliance with endangered species related laws. The Plan is intended to satisfy the legal requirements for the issuance of Permits that will allow the Take of species covered by the Plan in the course of otherwise lawful activities. The Plan will, to the maximum extent practicable, minimize and mitigate the impacts of the Taking and provide for Conservation of the Covered Species.

The Conservation Plan includes the establishment of an MSHCP Reserve System, setting Conservation Objectives to ensure the Conservation of the Covered Species and conserved natural communities in the MSHCP Reserve System, provisions for management of the MSHCP Reserve System, and a Monitoring Program, and Adaptive Management. The MSHCP Reserve System will be established from lands within

21 Conservation Areas. Because some Take Authorization is provided under the Plan for Development in Conservation Areas, the actual MSHCP Reserve System will be somewhat smaller than the total acres in the Conservation Areas. When assembled, the Reserve System will provide for the Conservation of the Covered Species in the Plan Area.

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates activities pursuant to Section 404 of the Federal Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFG regulates activities under the Fish and Game Code Section 1600-1616, and the Regional Board regulates activities pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

Federal Regulations

Section 404 of the Clean Water Act

In accordance with the Revised Definition of “Waters of the United States”; Conforming (September 8, 2023), “waters of the United States” are defined as follows:

(a) ***Waters of the United States*** means:

(1) Waters which are:

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

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

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

(4) Wetlands adjacent to the following waters:

- (i) Waters identified in [paragraph \(a\)\(1\)](#) of this section; or
- (ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;

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

(b) The following are not “waters of the United States” even where they otherwise meet the terms of [paragraphs \(a\)\(2\)](#) through [\(5\)](#) of this section:

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

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted

cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

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

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

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

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

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

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

(c) In this section, the following definitions apply:

(1) **Wetlands** means those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

(2) **Adjacent** means having a continuous surface connection

(3) **High tide line** means the line of intersection of the land with the water's surface at the maximum height reached by a rising tide. The high tide line may be determined, in the absence of actual data, by a line of oil or scum along shore objects, a more or less continuous deposit of fine shell or debris on the foreshore or berm, other physical markings or characteristics, vegetation lines, tidal gages, or other suitable means that delineate the general height reached by a rising tide. The line encompasses spring high tides and other high tides that occur with periodic frequency but does not include storm surges in which there is a departure from the normal or predicted reach of the tide due to the piling up of water against a coast by strong winds such as those accompanying a hurricane or other intense storm.

(4) **Ordinary high water mark** means that line on the shore established by the fluctuations of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

(5) ***Tidal waters*** means those waters that rise and fall in a predictable and measurable rhythm or cycle due to the gravitational pulls of the moon and sun. Tidal waters end where the rise and fall of the water surface can no longer be practically measured in a predictable rhythm due to masking by hydrologic, wind, or other effects.

Section 401 of the Clean Water Act

Pursuant to Section 401 of the CWA, any applicant for a federal license or permit to conduct any activity which may result in any discharge to waters of the United States must provide certification from the State or Indian tribe in which the discharge originates. This certification provides for the protection of the physical, chemical, and biological integrity of waters, addresses impacts to water quality that may result from issuance of federal permits, and helps insure that federal actions will not violate water quality standards of the State or Indian tribe. In California, there are nine Regional Water Quality Control Boards (Regional Board) that issue or deny certification for discharges to waters of the United States and waters of the State, including wetlands, within their geographical jurisdiction. The State Water Resources Control Board assumed this responsibility when a project has the potential to result in the discharge to waters within multiple Regional Boards.

State Regulations

Fish and Game Code

Fish and Game Code Sections 1600 et. seq. establishes a fee-based process to ensure that projects conducted in and around lakes, rivers, or streams do not adversely impact fish and wildlife resources, or, when adverse impacts cannot be avoided, ensures that adequate mitigation and/or compensation is provided.

Fish and Game Code Section 1602 requires any person, state, or local governmental agency or public utility to notify the CDFW before beginning any activity that will do one or more of the following:

- (1) substantially obstruct or divert the natural flow of a river, stream, or lake;
- (2) substantially change or use any material from the bed, channel, or bank of a river, stream, or lake;
- or
- (3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into a river, stream, or lake.

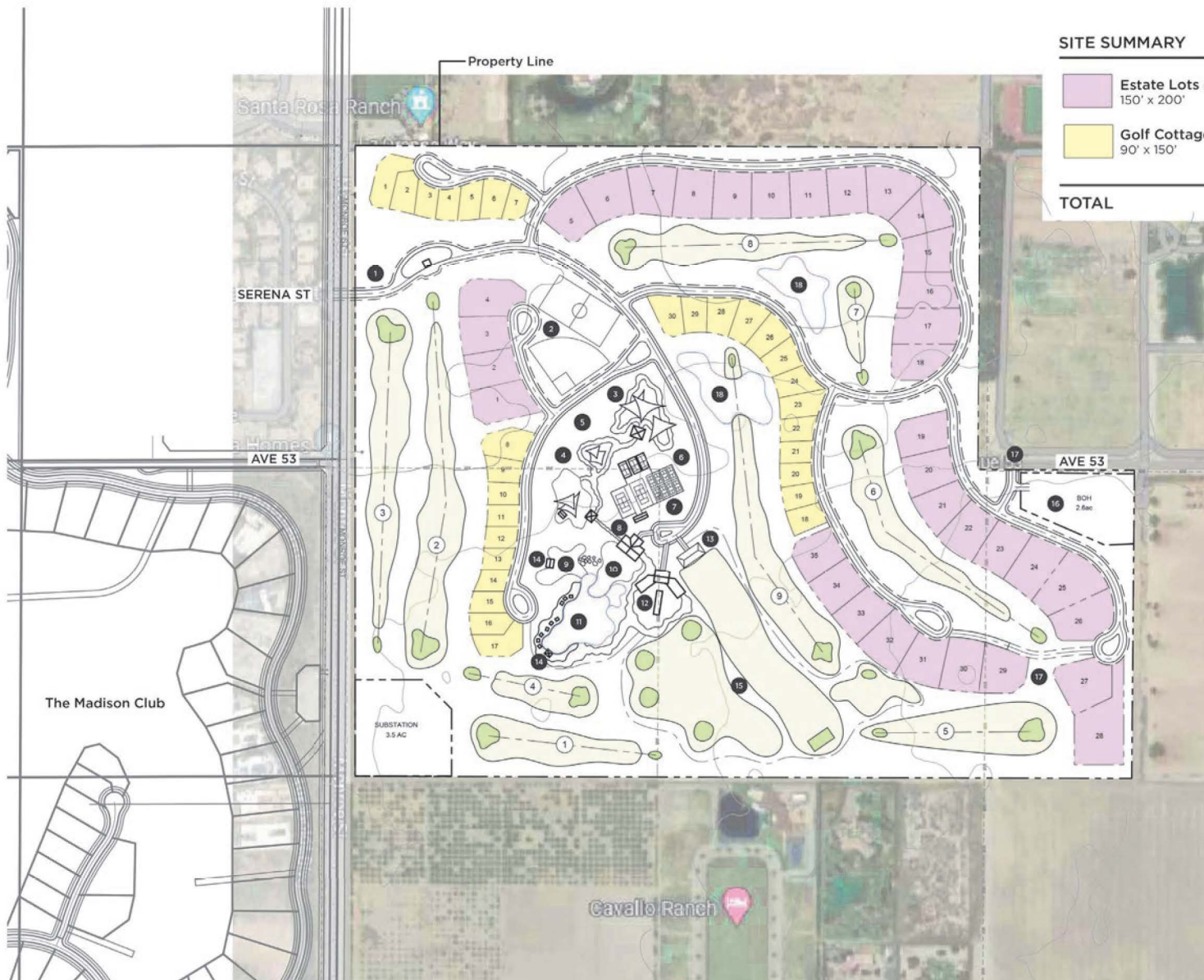
Fish and Game Code Section 1602 applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes in the State. CDFW's regulatory authority extends to include riparian habitat (including wetlands) supported by a river, stream, or lake regardless of the presence or absence of hydric soils and saturated soil conditions. Generally, the CDFW takes jurisdiction to the top of bank of the stream or to the outer limit of the adjacent riparian vegetation (outer drip line), whichever is greater. Notification is generally required for any project that will take place in or in the vicinity of a river, stream, lake, or their tributaries. This includes rivers or streams that flow at least periodically or permanently through a bed or channel with banks that support fish or other aquatic life and watercourses having a surface or subsurface flow that support or have supported riparian vegetation. A Section 1602 Streambed Alteration Agreement would be required if impacts to identified CDFW jurisdictional areas occur.

Porter Cologne Act

The California *Porter-Cologne Water Quality Control Act* gives the State very broad authority to regulate waters of the State, which are defined as any surface water or groundwater, including saline waters. The Porter-Cologne Act has become an important tool in the post SWANCC and Rapanos regulatory environment, with respect to the state’s authority over isolated and insignificant waters. Generally, any person proposing to discharge waste into a water body that could affect its water quality must file a Report of Waste Discharge in the event that there is no Section 404/401 nexus. Although “waste” is partially defined as any waste substance associated with human habitation, the Regional Board also interprets this to include fill discharged into water bodies.

Attachment E

Site Plan



SITE SUMMARY

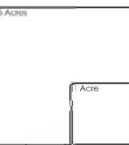
 Estate Lots ± 0.75 AC 150' x 200'	35
 Golf Cottages ± 0.3 AC 90' x 150'	30
TOTAL	65

KEYNOTE LEGEND

- 1 Main Entry
- 2 Baseball & soccer fields
- 3 Pump Track
 - Observation Tower
 - Overhead Shade Structure
 - Restrooms
- 4 Kids Playground
- 5 Farm to Table
- 7 Racket Courts
 - Entry Pavilion
 - Restrooms & Cold Drinks
 - (2) Tennis
 - (3) Padel
 - (8) Pickleball
 - Cart parking under Courts
- 8 Event Barn
 - Golf Simulator
 - Bar
 - F&B / Grill
 - One Way Arrival
- 9 Croquet and Bocce Ball
- 10 Event Lawn
- 11 Lagoon
 - Kid's Splash Pool
 - Sand Beach
 - Beach Cabanas
- 12 Fitness and Lap Pool
- 13 Starter Shack & Golf Bar
- 14 Shade Structure
- 15 Short Game Area
- 16 Back Of House
- 17 Emergency Vehicular Access (EVA)
- 18 Recirculating Water Feature & Irrigation Ponds

Master Plan Concept 9.0 – Option A

The Ranch At Madison
La Quinta, CA



SEPTEMBER 25, 2024

1" = 200'-0"
0 100' 200' 400'

VITA

PLANNING | LANDSCAPE ARCHITECTURE | ARCHITECTURE

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