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North Glendora Water Tank Project

Biological Letter Report

City of Glendora, Los Angeles County, California

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June 2023
Revised November 2023

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1.0 INTRODUCTION

Blackhawk Environmental, Inc. (Blackhawk) biologist conducted an assessment of biological resources (biological resource assessment) in support of the proposed North Glendora Water Tank Project (Project), in the City of Glendora (City), Los Angeles County, California (Attachment A, Figure 1). The Project is located near the northern terminus of Glendora Avenue, approximately 2000 feet north of the Seventh-Day Adventist Church, in the Glendora USGS 7.5-minute quadrangle (Section 19, Township 1N, Range 9W), on property owned by the City of Glendora. The Project is situated in a largely undeveloped portion of North Glendora, at the foothills of the San Gabriel Mountains, between Big Dalton Canyon and the San Gabriel Canyon/Morris Reservoir. The proposed Project includes replacement of the existing water tank with two new water tanks, improvements to the currently paved private road leading to the water tank facility, and use of a construction laydown area (Figure 2). The Project also includes modifications to existing stormwater conveyance systems (brow-ditches).

The proposed Project falls under the purview of the Glendora Community Plan 2025 – Conservation Element (Community Plan), City of Glendora Urban Forestry Manual (Forestry Manual) and all applicable State and Federal regulations outlined below in Section 3. The report herein is intended to satisfy the required evaluation of any potentially significant environmental impacts that could result from Project implementation. The biological resource assessment was conducted to identify presence or absence of sensitive natural resources, identify the potential for occurrence (PFO) of special-status plant and wildlife species, and to develop mitigation measures to offset potential direct, indirect and cumulative impacts to any such resources on and/or adjacent to the proposed Project alignment. Additionally, the Biological Letter Report (BLR) serves to illustrate the baseline conditions for which the determination of impacts and mitigation under the California Environmental Quality Act (CEQA) should be analyzed during the environmental review process.

1.1 Project Location and Description

The proposed 2.02-acre Project is in the City of Glendora, Los Angeles County, California (Figure 1). The Project is situated in a generally undeveloped portion of North Glendora, at the foothills of the San Gabriel Mountains, between Big Dalton Canyon and the San Gabriel Canyon/Morris Reservoir.

Project implementation will result in approximately 2.02 acres of impacts from grading, removal of the existing water storage tank, construction of two new water storage tanks, upgrades to associated private roads, and use of a construction laydown area (Figure 2). Additionally, several trees, including an oak tree, would be removed as a result of the project. These impacts will include 1.70 acres of temporary impacts and 0.32 acres of permanent impacts. Primary access will be provided via the existing, paved private road off of Glendora Avenue.

The proposed Project is situated on the foothills at the base of the San Gabriel Mountains along the lower portion of a steep ridgeline that runs from northwest to southeast. To the northeast and southwest of the Project are two steep canyons, supporting potentially Jurisdictional Waterways and associated riparian vegetation located 80 and 300 feet from the site respectively (Figure 3). These features are identified in the U.S. Fish and Wildlife Service National Wetlands Inventory as Palustrine Wetlands. Existing onsite and surrounding land uses include rural residential development, associated ornamental vegetation and roadways surrounded by expansive native habitat that is recovering from severe fire damage resulting from the Colby Fire in 2014 (Figure 3). Approximately 57 percent of the temporary and permanent

impact areas associated with the Project contains disturbed and developed habitat, and the remaining 43 percent of the site contains native habitat types including Diegan Coastal Sage Scrub, Flat-topped Buckwheat Scrub and Open Coast Live Oak Woodland.

2.0 METHODS

Methods described below focused on determination of potential for occurrence of special-status plant and wildlife species. Species are considered to be special-status, and are therefore subject to analysis in this section, if they meet one or more of the following criteria:

- Plant and animal species listed as endangered (FE), threatened (FT), or candidates (FPE or FPT) for listing under the Federal Endangered Species Act (FESA);
- Plant and animal species listed as endangered (SE), threatened (ST), or candidates (SPE or SPT) for listing under the California Endangered Species Act (CESA);
- Animals designated as Fully Protected Species (FP), as defined in California Fish and Game Code Sections 3511, 4700, 5050, and 5515;
- Animal species designated as Species of Special Concern (SSC) by the CDFW;
- Bat species designated as High Priority (H) by the Western Bat Working Group;
- Plants that are state listed as Rare[1]; or
- Plant species ranked by the California Native Plant Society (CNPS) as having a California Rare Plant Rank (CRPR) of 1 or 2.[2]

Sensitive natural communities are communities that have a limited distribution and are often vulnerable to the environmental effects of projects. CDFW identifies sensitive communities and keeps records of their occurrences in CNDDB. These communities may or may not contain special-status species or their habitats. Furthermore, the Glendora Community Plan 2025 Conservation Element designates natural communities that are deemed sensitive. For purposes of this assessment, sensitive natural communities are considered to be any of the following:

- Vegetation communities listed in the CNDDB;
- Communities listed in the Natural Communities List with a rarity rank of S1 (critically imperiled), S2 (imperiled), or S3 (vulnerable).
- Woodland and coastal sage scrub habitats considered to be sensitive by the City of Glendora.

2.1 Literature Review

Prior to conducting the biological resource assessment, a desktop analysis was completed to evaluate the potential for the Project impact areas and vicinity to contain state and/or federally-listed (threatened or endangered)[1] and/or otherwise special-status plant and animal species. Information queries were conducted by evaluating species occurrences from California Natural Diversity Database (CNDDB), United States Fish & Wildlife Service (USFWS), California Native Plant Society rare plant finder (CNPS), eBird, and USFWS Information for Planning and Consultation (IPAC) within 3 miles of the Project. The Community Plan and Forestry Manual were reviewed to ensure compliance with local environmental requirements. Soil type data from the Natural Resources Conservation Service (NRCS) was also reviewed to assist with identifying suitable habitat for special-status species potentially present. The results of the literature review were used to focus biological survey efforts for any special-status

[1] Plants that were previously state listed as "Rare" have been re-designated as state threatened.

species[2] perceived to have some potential to occur on and/or adjacent to the Project impact areas.

Following the habitat assessment, potentials for special-status species to occur were evaluated based on proximity, connectivity, recency and abundance of known occurrences, availability of suitable habitats[3], historic distributions of the species, elevation range, and existing site conditions. Potential for occurrence were generally evaluated based on the following criteria:

- **Present** – The species was observed within the Project impact areas during the survey effort.
- **High Potential** – Historic, database, and/or inventory records indicate that the species has been known to occur within the vicinity of the Project (1-3 miles), and suitable habitat occurs onsite. The species has a high probability of being found on the site.
- **Moderate Potential** – Historic, database, and/or inventory records indicate that the species has been known to occur within the vicinity of the Project, but low-quality suitable habitat occurs onsite, or; no records occur within the vicinity of the Project, but the Project occurs within the historic range of the species, and moderate to high quality habitat occurs onsite. The species has a moderate probability of being found on the site.
- **Low Potential** – Historic, database, and/or inventory records indicate that the species has not been known to occupy the immediate vicinity of the Project, and low-quality habitat for the species exists onsite, or; records occur within the vicinity of the Project, but the majority of the habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.
- **Absent** – The species is restricted to habitats not occurring within the Project site or is considered extirpated from the Project impact areas.

2.2 Survey Methods

The biological resource survey was conducted on August 25, 2022, by Blackhawk senior biologist Ryan Quilley. The survey was conducted on foot and occurred from 09:20 to 12:55, under favorable weather conditions of 77°F to 82°F, 2 to 11 mph winds, no precipitation and 0-percent cloud cover. On June 1, 2023 a follow up biological resource survey and focused rare plant survey was conducted by senior biologists Ryan Quilley and Dustin Janeke to assess the newly proposed construction staging area that was not initially evaluated during the August 2022 survey.

Onsite and adjacent areas were characterized for their existing conditions and current land uses. In order to analyze the potential for indirect impacts to biological resources, the survey included the proposed Project impact area (Project impact areas) as well as an additional 200 feet surrounding the Project (Survey Buffer). The onsite vegetation communities were identified by dominant species present and mapped directly onto high-resolution aerial imagery for Geographic Information System (GIS) extrapolation (Figure 3).

PFO of special-status plant and animal species resulting from the literature review were assessed in relation to the existing conditions of the Project site. Elevation ranges for evaluated plant species were taken from the Jepson Manual. Representative photographs were collected to document current conditions of the Project impact areas as well as the general surroundings (Attachment B). All plant and wildlife species observed within the Project impact areas and Survey Buffer, were cataloged in field

[2] Under the CEQA review process, only CRPR 1 and 2 species are considered, as these are the only CNPS species that meet CEQA's definition of "rare" or "endangered." Impacts to List 3 and 4 species do not meet CEQA's definition of "rare" or "endangered."

[3] Only habitat requirements for the species range in California are listed

notes and used to compile species lists (Attachment C and D). Wildlife species observations included detections by sight and sound in addition to wildlife sign (scat, tracks, carcasses, nests, middens etc.). The Project impact areas and Survey Buffer were assessed for the presence/absence of potentially jurisdictional waters of the USACE, RWQCB, and CDFW, including vernal pools.

Due to moderate potential for rare plants to occur within the Project impact areas (Table 3), a focused rare plant survey was conducted by Blackhawk biologists Ryan Quilley and Dustin Janeke on June 1, 2023. This survey included cataloging all plant species observed within the Project site as well as an additional 50 feet surrounding the Project, specifically focusing on rare plant species. The Focused Rare Plant Survey Report summarizes the methods and results of the focused rare plant survey (Attachment E).

2.2.1 Vegetation Mapping

On August 25, 2022, Blackhawk conducted detailed digital mapping of vegetation communities within the Project impact areas and Survey Buffer. Additional areas were mapped during a subsequent visit on June 1, 2023 to account for a newly proposed construction laydown area. Vegetation communities were described according to vegetation community classifications according to Holland (1986) and Oberbauer (2008) to the extent feasible. Vegetation communities that are not described by the aforementioned classification manuals, were mapped based on dominant plant species composition and density.

Vegetation community classifications and boundaries were made directly into the geographic information system (GIS) mapping application, "Collector for ArcGIS". GIS software (i.e., ArcGIS) was used to calculate acreages and areas of the features within the Survey Buffer and Project impact areas. Biological field notes were prepared to document the dominant and subdominant plant species within each community. Plants were identified by visual observation, and nomenclature for common native plants followed Calflora.

2.2.2 Biological Resource Assessment

Blackhawk senior biologists Ryan Quilley and Dustin Janeke conducted a biological resource assessment on August 25, 2022 and June 1, 2023. Focused surveys were not conducted for special-status wildlife species; however, wildlife species observed or detected during field surveys by sight, calls, tracks, scat, or other signs were recorded in the field notes of the biologists. Binoculars were used when necessary to assist with wildlife species identification.

PFO of special-status plant and wildlife species resulting from the literature review was assessed in relation to the existing conditions of the Project impact areas and Survey Buffer. The ability to identify wildlife species was limited by seasonal and temporal factors. Nocturnal animals were not observed directly, as the survey was performed during the day. In addition, seasonally migratory species that may be present within the area only at specified periods outside survey timing may not have been detected. Latin and common names of wildlife species followed the American Ornithologists' Union (2018) and Unitt (2004) for birds; Crother (2012) for amphibians and reptiles.

In addition to biological resources, the biological resource assessment also included an evaluation of water features and riparian habitats that may have the potential to be impacted by the proposed Project.

2.2.3 Focused Rare Plant Survey and Report Assessment

A literature review for known occurrences of special-status plant species was conducted within three miles of the Project site via searches of the California Natural Diversity Database (CNDDB) and United States Fish & Wildlife Service (USFWS) Critical Habitat designations. Based on the results of the literature review, a focused rare plant survey was conducted primarily focusing on the seven plant species with a low to moderate PFO within the Project site. The survey was conducted on June 1, 2023, by a team of two Blackhawk biologists (Ryan Quilley and Dustin Janeke). The survey occurred from 08:45 to 12:05 under cloudy, cool and wet conditions of 58°F to 61°F with 0 to 3 mph winds. The survey was conducted by walking in slightly meandering transects approximately 20 to 60 feet apart from one another along the entire 2.02-acre Project site in order to achieve 100% visual coverage. Each surveyor recorded all plant species encountered along the way in his field notes. In order to make specific or sub-specific determinations, digital photographs and/or small samples were collected for some species that required further analysis.

The Focused Rare Plant Survey Report details the focused rare plant survey methods and results from spring of 2023. The Focused Rare Plant Survey Report is included as an attachment to this report (Attachment E). No rare plant species were identified within the project impact area or associated 50-foot survey buffer. Therefore, all rare plant species evaluated within the BLR are considered absent from the site.

2.3 Limitations That May Influence Results

These surveys were conducted during the daytime, which usually results in few observations of nocturnal mammals. In addition, many species of reptiles and amphibians are nocturnal, cryptic, or subterranean in their habits and are difficult to observe using standard survey methods. Therefore, conservative estimates regarding the PFOs of certain special-status plant and wildlife species have been considered with appropriate mitigation measures proposed herein.

Following the vegetation mapping and wildlife surveys, a focused rare plant survey was conducted to determine the presence or absence of rare plants within the Project Site. This survey was performed within the bloom periods of the rare plants identified in the literature review during ideal survey conditions. Focused surveys for wildlife were not conducted.

3.0 REGULATORY SETTING

This section is divided into sub-sections that include Federal, State and Local regulations that apply to the Project as proposed.

3.1 State and Federal Take Authorizations for Listed Species

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

- Section 7 of the FESA stipulates that any federal action that may affect a species listed as threatened or endangered requires a formal consultation with USFWS to ensure that the action is not likely to

jeopardize the continued existence of the listed species or result in destruction or adverse modification of designated critical habitat. 16 U.S.C. 1536(a)(2).

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

- Sections 2090-2097 of the California Endangered Species Act (CESA) require that the state lead agency consult with CDFW on projects with potential impacts on state-listed species. These provisions also require CDFW to coordinate consultations with USFWS for actions involving federally listed as well as state- listed species. In certain circumstances, Section 2080.1 of the California Fish and Game Code allows CDFW to adopt the federal incidental take statement or the 10(a) permit as its own based on its findings that the federal permit adequately protects the species under state law.

3.2 Federal

3.2.1 Federal Endangered Species Act (FESA)

The Federal Endangered Species Act of 1973 (FESA) defines an endangered species as "any species that is in danger of extinction throughout all or a significant portion of its range." A threatened species is defined as "any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to "take" any listed species. "Take" is defined in Section 3(18) of FESA: "...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Further, the United States Fish and Wildlife Service (USFWS), through regulation, has interpreted the terms "harm" and "harass" to include certain types of habitat modification that result in injury to, or death of species as forms of "take." These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a Federal agency for an action that could affect a federally listed plant and animal species, the property owner and agency are required to consult with USFWS. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants.

Federally-Designated Special-Status Species

All references to federally protected species in this Report (whether listed, proposed for listing, or candidate) include the most current published status or candidate category to which each species has been assigned by USFWS. Additionally, the USFWS *Birds of Conservation Concern 2008* report was published to identify the migratory and non-migratory bird species (beyond those already federally listed) that represent the highest conservation priorities for USFWS.

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

- **FE**: Federally listed as Endangered
- **FT**: Federally listed as Threatened
- **FPE**: Federally proposed for listing as Endangered
- **FPT**: Federally proposed for listing as Threatened

- **FC**: Federal Candidate species (Former Category 1 candidates)
- **BCC**: USFWS Birds of Conservation Concern

3.2.2 Migratory Bird Treaty Act (MBTA)

The Migratory Bird Treaty Act (PL 65-186, as amended; 16 USC §§ 703 et seq.) protects most birds, whether or not they migrate. Birds, their nests, eggs, parts, or products may not be killed or possessed. Game birds are listed and protected except where specific seasons, bag limits, and other features govern their hunting. Exceptions are made for some agricultural pests, which require a USFWS permit (yellow-headed, red-winged, bi-colored, tri-colored, Rusty and Brewer's Blackbirds, cowbirds, all grackles, crows and magpies). Some other birds that injure crops in California may be taken under the authority of the County Agricultural Commissioner (meadowlarks, horned larks, golden-crowned sparrows, white- and other crowned sparrows, goldfinches, house finches, acorn woodpeckers, Lewis' woodpeckers and flickers). Permits may be granted for various non-commercial activities involving migratory birds and some commercial activities involving captive-bred migratory birds.

3.2.3 Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (PL 95-616; 16 USC §§ 668 et seq.) provides for protection of the bald and golden eagles by prohibiting taking, possession, and commerce in the birds.

3.2.4 Fish and Wildlife Conservation Act of 1980

The Fish and Wildlife Conservation Act of 1980 (PL 96-366; 16 USC §§2901 et seq.) provides for conservation, protection, restoration and propagation of certain species, including migratory birds threatened with extinction.

3.2.5 Federal Clean Water Act (CWA)

The Clean Water Act (CWA) regulates the discharge of pollutants to waters of the United States to protect water quality and the beneficial uses of these waters. Through a permit application process, CWA Section 404 regulates dredge and fill discharges to waters of the United States.

Vernal Pools

Vernal pools are considered "problem areas" because vegetation or hydric soils may be lacking due to seasonal filling by rainfall and eventual drying. As described in the Arid Supplement, "the species composition of some wetland plant communities in the Arid West can change in response to seasonal weather patterns and long-term climatic fluctuations. Wetland types that are influenced by these shifts include vernal pools, playa edges, seeps and springs. Lack of hydrophytic vegetation during dry periods should not immediately eliminate a site from further consideration as a wetland." In addition, since they support seasonally ponded soils, when soil investigations are performed within vernal pools, they may lack hydric soil indicators. The USACE includes problem soils as "seasonally ponded, depressional wetlands (that) occur in basins and valleys throughout the Arid West. Most are perched systems, with water ponding above a restrictive soil layer, such as a hardpan or clay layer, that is at or near the surface (e.g., in Vertisols). Some of these wetlands lack hydric soil indicators due to limited saturation depth, saline conditions or other factors."

3.3 State

3.3.1 State of California Endangered Species Act (CESA)

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

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

State-Designated Special-Status Species

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

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

- **SE**: State-listed as Endangered
- **ST**: State-listed as Threatened
- **SCE**: State candidate for listing as Endangered
- **SCT**: State candidate for listing as Threatened
- **FP**: State Fully Protected
- **SSC**: Species of Special Concern

California Rare Plant Rank

The CNPS is a private plant conservation organization dedicated to the monitoring and protection of special-status species in California. The California Native Plant Society's *California Native Plant Society's Inventory of Rare and Endangered Plants of California* separates plants of interest into five categories. CNPS has compiled an inventory comprised of the information focusing on geographic distribution and qualitative characterization of Rare, Threatened, or Endangered vascular plant species of California. The list serves as the candidate list for listing as threatened and endangered by CDFW.

3.3.2 California Environmental Quality Act (CEQA)

Shortly after the United States federal government passed the National Environmental Policy Act (NEPA), the California Environmental Quality Act (CEQA) was passed in 1970 to institute a statewide policy of environmental protection. CEQA does not directly regulate land uses, but instead requires state and local agencies within California to follow a protocol of analysis and public disclosure of environmental impacts of proposed projects and adopt all feasible measures to mitigate those impacts. CEQA makes environmental protection a mandatory part of every California state and local agency's decision-making process.

CEQA Thresholds of Significance

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

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

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

> *"The project has the potential to: substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or wildlife community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, ..."*

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

Criteria for Determining Significance Pursuant to CEQA

Attachment G of the 1998 State CEQA guidelines indicate that a project may be deemed to have a significant effect on the environment if the project is likely to:

a) *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.*

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

c) *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.*

d) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.*

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

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

CEQA Guidelines Section 15380

The CEQA requires evaluation of a project's impacts on biological resources and provides guidelines and thresholds for use by lead agencies for evaluating the significance of proposed impacts. Sections 5.1.1 and 5.2.2 below set forth these thresholds and guidelines. Furthermore, pursuant to the CEQA Guidelines Section 15380, CEQA provides protection for non-listed species that could potentially meet the criteria for state listing. For plants, CDFW assigns California Rare Plant Ranks (CRPR) to species categorized as List 1A, 1B, or 2 of the California Native Plant Society (CNPS) *Inventory of Rare and Endangered Plants in California* may meet the criteria for listing and should be considered under CEQA. CDFW also recommends protection of plants, which are regionally important, such as locally rare species, disjunctive populations of more common plants, or plants on the CNPS Lists 3 or 4.

3.3.3 California Fish & Game Codes 3500 Series

California Fish & Game Codes 3500, 3503, 3503.5, 3505, 3511 and 3513 are State regulations that cover resident and non-resident game birds, protected bird nests, protected raptor nests, egrets, ospreys, Fully Protected bird species, and take considerations for Migratory Bird Treaty Act birds.

- **Code 3500:** "(a) Resident game birds are as follows:

  (1) Doves of the genus Streptopelia, including, but not limited to, spotted, ringed turtledoves, and Eurasian collared-doves.

  (2) California quail and varieties thereof.

  (3) Gambel's or desert quail.

  (4) Mountain quail and varieties thereof.

  (5) Sooty or blue grouse and varieties thereof.

  (6) Ruffed grouse.

  (7) Sage hens or sage grouse.

  (8) Hungarian partridges.

  (9) Red-legged partridges including the chukar and other varieties.

  (10) Ring-necked pheasants and varieties thereof.

  (11) Wild turkeys of the order Galliformes.

  (b) Migratory game birds are as follows:

  (1) Ducks and geese.

  (2) Coots and gallinules.

  (3) Jacksnipe.

  (4) Western mourning doves.

  (5) White-winged doves.

  (6) Band-tailed pigeons

  (c) Reference in this code to "game birds" means both resident and migratory game birds."

- **Code 3503:** "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto."
- **Code 3503.5:** "It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."
- **Code 3505:** "It is unlawful to take, sell, or purchase any aigrette or egret, osprey, bird of paradise, goura, numidi, or any part of such a bird."
- **Code 3511:** "(a) (1) Except as provided in Section 2081.7 or 2835, fully protected birds or parts thereof may not be taken or possessed at any time. No provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected bird, and no permits or licenses heretofore issued shall have any force or effect for that purpose. However, the department may authorize the taking of those species for necessary scientific research, including efforts to recover fully protected, threatened, or endangered species, and may authorize

the live capture and relocation of those species pursuant to a permit for the protection of livestock. Prior to authorizing the take of any of those species, the department shall make an effort to notify all affected and interested parties to solicit information and comments on the proposed authorization. The notification shall be published in the California Regulatory Notice Register and be made available to each person who has notified the department, in writing, of his or her interest in fully protected species and who has provided an e-mail address, if available, or postal address to the department. Affected and interested parties shall have 30 days after notification is published in the California Regulatory Notice Register to provide any relevant information and comments on the proposed authorization.

(2) As used in this subdivision, "scientific research" does not include any actions taken as part of specified mitigation for a project, as defined in Section 21065 of the Public Resources Code.

(3) Legally imported fully protected birds or parts thereof may be possessed under a permit issued by the department.

(b) The following are fully protected birds:

(1) American peregrine falcon (*Falco peregrinus anatum*).

(2) Brown pelican (*Pelican occidentalis*).

(3) California black rail (*Laterallus jamaicensis coturniculus*).

(4) California Ridgway's rail (*Rallus longirostris obsoletus*).

(5) California condor (*Gymnogyps californianus*).

(6) California least tern (*Sterna albifrons browni*).

(7) Golden eagle (*Aquila chrysaetos*).

(8) Greater sandhill crane (*Grus Canadensis tabida*).

(9) Light-footed Ridgway's rail (*Rallus longirostris levipes*).

(10) Southern bald eagle (*Haliaeetus leucocephalus leucocephalus*).

(11) Trumpeter swan (*Cygnus buccinator*).

(12) White-tailed kite (*Elanus leucurus*).

(13) Yuma Ridgway's rail (*Rallus longirostris yumanensis*).

- **Code 3513:** "It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act 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 Migratory Treaty Act."

3.3.4 Native Plant Protection Act

The Native Plant Protection Act (NPPA) was enacted in 1977 and allows the California Fish and Game Commission to designate plants as rare or endangered. There are 64 species, subspecies, and varieties of

plants that are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants, but includes some exceptions for agricultural and nursery operations, emergencies, and/or with proper notification to the CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. 3.4 Local

3.4.1 Glendora Community Plan 2025 Conservation Element

The purpose of the Conservation Element is to provide direction regarding the conservation, development and utilization of natural resources. This Plan was developed to meet the requirements of the California Government Code Section 65302(d) which requires that a General Plan include:

"*A conservation element for the conservation, development, and utilization of natural resources including water and its hydraulic force, forests, soils, rivers and other waters, harbors, fisheries, wildlife, minerals, and other natural resources. The conservation element shall consider the effect of development within the jurisdiction, as described in the land use element, on natural resources located on public lands, including military installations.*

The conservation element may also cover: (1) the reclamation of land and waters; (2) prevention and control of the pollution of streams and other waters; (3) regulation of the use of land in stream channels and other areas required for the accomplishment of the conservation plan; (4) prevention, control, and correction of the erosion of soils, beaches, and shores; (5) protection of watersheds; (6) the location, quantity and quality of the rock, sand and gravel resources; and (7) flood control."

3.4.1.2 Stormwater Pollution Control

Local stormwater pollution control measures are implemented pursuant to the Clean Water Act (CWA), Federal Water Quality Control Act and National Pollutant Discharge Elimination System (NPDES). The Standard Urban Stormwater Mitigation Plan (SUSMP) was developed as part of the Los Angeles Regional Water Quality Control Board's Municipal Stormwater Program. The SUSMP addresses stormwater pollution from certain types of new development and redevelopment. The SUSMP specifies the minimum required BMPs that must be used for a designated project. Additional BMPs may be required on certain targeted categories of projects based on these regulations at the discretion of the City of Glendora. Applicable project applicants are required to incorporate appropriate SUSMP requirements into their development plans.

The City requires that a Stormwater Pollution Prevention Plan (SWPPP) and Monitoring Program Plan be completed for industries that require a NPDES General Industrial Activities Storm Water Permit and for any construction activity in the City requiring a NPDES construction permit. SWPPPs are operator/owner prepared plans that identify BMPs for implementation and monitor the effectiveness of the BMPs. The SWPPP identifies the source control and/or treatment control practices (BMPs) that would significantly reduce, avoid or mitigate runoff pollutants to the "maximum extent practicable." The Community Plan includes the following applicable measures as they relate to the protection of water resources within the region:

Planning Consideration: The potential environmental impacts of stormwater runoff are a significant concern to Glendora residents. Stormwater runoff can carry pollutants into the watershed, negatively affecting local and regional water quality. Maintenance and improvement of the City's stormwater system to reduce potential impacts to water quality should be a priority.

Goal	**CON-8**	Proper conveyance and treatment of stormwater and implementation of techniques to reduce pollutants consistent with Federal, State and regional regulations and standards.
Policies	CON-8.1	Ensure existing drainage facilities are properly maintained.
	CON-8.2	Ensure all new development and redevelopment projects comply with Federal, State, regional and City regulations and ordinances related to stormwater.
	CON-8.3	Incorporate project-level stormwater mitigation measures to reduce potential impacts to water quality and ensure mitigation measures are adequately monitored.

3.4.1.3 Sensitive Habitat Types and Biological Resources

Four vegetative types broadly classified as woodlands, chaparral, coastal sage scrub and freshwater marsh may be found in the hillsides. These areas are composed of native and non-native plant species. According to the Community Plan, woodland and coastal sage scrub habitats are considered to be sensitive habitats and have the highest potential to host sensitive species. The City's flower, thread-leaved brodiaea (*Brodiaea filifolia*), a state-endangered plant species, was re-discovered in 1989 at a location now designated as a preserve. The Brodiaea is both state-endangered and federally-threatened. Within the eastern portion of the foothills, critical habitat has been designated for the federally listed California gnatcatcher in coastal sage scrub and chaparral habitat.

Significant wildlife habitats do not typically occur within the urbanized portions of the City. However, the hillsides have been identified as containing wildlife habitats. The preservation of habitats associated with the hillsides and canyons are of concern to the City. Development within the hillsides can potentially result in the destruction of oak woodlands eliminating habitats associated with canyons. The grading of ridges and slopes reduces shrub and grassland vegetation, which are used as forage and shelter by animals. In addition, increased erosion and run-off can result. Development can also result in the increase of introduced species of plants and animals, which compete and replace native species.

Glendora has been recognized regionally as a biodiversity "hot spot". Federally listed as threatened and State listed as endangered, the thread-leaved Brodiaea is now well-established and protected in preserves known to occur within Glendora. The State and federally listed least Bell's vireo and federally threatened California gnatcatcher are also known to occur within the City. Other potentially present threatened or endangered species within the City include the slender-horned spineflower, California yellow-billed cuckoo and southwestern willow flycatcher.

3.4.1.4 Preservation and Enhancement of Landscape Resources

Planning Consideration: The City of Glendora is proud of its naturally landscaped hillsides and its mature residential and commercial landscapes. Preservation, enhancement, care and maintenance of these important landscape resources will continue providing a positive contribution to the quality and character of Glendora.

Goal	**CON-10**	A tree preservation strategy.
Policies	CON-10.1	Involve residents in the maintenance and preservation of individual trees by providing them with a choice of trees planted.
	CON-10.2	Maintain the tree preservation ordinance to ensure the preservation of existing tree resources.
	CON-10.3	Establish a tree master plan to expand the urban forest throughout the City.
	CON-10.4	Ensure appropriate placement and proper maintenance of tree resources within the City.

Planning Consideration: The City's residents acknowledge the importance of conserving the City's open space and natural resources for the benefit of community residents, and the region. Glendora's location adjacent to United States Forest Service lands, as well as the variety of other sensitive habitats and natural systems within and contiguous to the community should be acknowledged in land use planning efforts. With planning and action to protect tributaries and ridgelines, sustainable and long-term results from healthy native species of plants and wildlife may be anticipated.

Goal	**CON-9**	Preservation and conservation of natural resources and sensitive habitats.
Policies	CON-9.2	Continue to partner with the Glendora Community Conservancy to determine funding opportunities for open space land acquisition for the preservation of natural resources and sensitive habitats.
	CON-9.4	Ensure the preservation of the natural plant communities in the hillside areas.
	CON-9.5	Ensure land use decisions consider the preservation of sensitive plant and animal species, critical habitat, wildlife corridors and biologically sensitive areas.
	CON-9.7	Ensure preservation of local watersheds in development to maintain native plant habitats and ensure connectivity of wildlife corridors.

3.4.1.5 Urban Forestry Manual

The Community Plan relies on the Glendora City Urban Forestry Manual for management of tree resources within the City. This manual focuses on appropriate measures taken when addressing tree resources in Glendora. The purpose of this manual is to define and illustrate the policies and procedures that shall be utilized by City staff in the management and care of all trees located on City owned property and within the City's parkway areas, and in some cases regarding California native species and new developments/private property. Native trees occurring on the Project do not qualify as parkway trees and are not located on private property, therefore are not protected under Glendora City Urban Forestry Manual Chapter 16.14 "Tree Removal."

4.0 RESULTS

4.1 Environmental Setting

The proposed 2.02-acre Project is located in the City of Glendora, Los Angeles County, California (Attachment A, Figure 1). The Project is situated in a largely undeveloped portion of North Glendora, at the foothills of the San Gabriel Mountains, between Big Dalton Canyon and the San Gabriel Canyon/Morris Reservoir.

Project implementation will result in approximately 2.02 acres of impacts from grading, removal of the existing water storage tank, construction of two new water storage tanks, the development of a new laydown area and upgrades to associated private roads (Figure 2). Development of the project will also result in the removal of a number of trees, including an oak tree. These impacts will include 1.70 acres of temporary impacts and 0.32 acres of permanent impacts. Primary access will be provided via the existing, paved, private road off Glendora Avenue.

The proposed Project site is situated on the foothills at the base of the San Gabriel Mountains along the lower portion of a steep ridgeline that runs from northwest to southeast. To the northeast and southwest of the Project are two steep canyons, supporting likely Jurisdictional Waterways and associated riparian vegetation located 80 and 300 feet from the site respectively (Figure 3). These features were identified in the U.S. Fish and Wildlife Service National Wetlands Inventory as Palustrine Wetlands. Existing onsite and surrounding land uses include rural residential development, associated ornamental vegetation and roadways surrounded by expansive native habitat that is recovering from recent fire damage likely as a result of the Colby Fire in 2014 (Figure 3). Within the proposed Project impact areas, approximately 57 percent of the Project impact areas contains disturbed and developed habitat, and the remaining 43 percent of the site contains native habitat types including Diegan Coastal Sage Scrub, Flat-topped Buckwheat Scrub and Open Coast Live Oak Woodland. Several special-status and/or listed species were identified in the vicinity of the Project during the literature review (Table 3 & Figure 4).

4.2 Soils and Hydrologic Features

One distinct soil series mapped by USDA (1973) occurs within the Project impact areas: Caperton-Trigo, granitic substratum-Lodo families complex, with slopes ranging between 50 to 85 percent. The Caperton-Trigo substratum-Lodo families complex is described as generally granitic and loamy with weak granular structure containing highly weathered granitic rock within the substratum that is well drained.

The Project impact areas is located along a ridgeline, with steep slopes to the southwest and northeast of the site. Steep canyons occur 370 feet to the southwest and 80 feet to the northeast of the Project impact areas and contain riparian habitat indicating that these features are likely state or federal jurisdictional waterways (Figure 3). Neither of these jurisdictional features occur within the Project impact areas.

Elevations within the Project impact areas range from approximately 1505 feet above sea level (ASL) to 1353 feet ASL and slope steeply downward toward the City of Glendora to the south. Sheet flow of stormwater appears to gradually concentrate within the historically graded area associated with development of the existing water tank. Stormwater then eventually discharges into a steep canyon and riparian habitat to the east of the Project. One man-made stormwater conveyance was observed at the northeastern-most corner of the Project impact areas. Surface water from at the site appears to flow from northwest to east-southeast, concentrating at a riprap-lined check dam before flowing into

natural woodlands and eventually into the canyon northeast of the site.

4.3 Vegetation Communities/Land Use Cover Types

A total of eight vegetation communities/land use cover types were described and mapped within the Project impact areas and Survey Buffer. Vegetation communities that did not directly correspond to Holland or Oberbauer, were described based on species composition, structure and density. The geographical distribution of these communities within the Project impact areas and Survey Buffer are depicted on Figure 3; and vegetation communities/land use cover types and associated acreages are as follows:

Table 1. Vegetation Communities within the Project impact areas and Survey Buffer

Vegetation Community (Holland Code)	**Permanent Impacts Within Project impact areas** (Acres)	**Temporary Impacts Within Project impact areas** (Acres)	**Within Survey Area** (200-foot Survey Buffer; Acres)
Open Coast Live Oak Woodland (71161)	0.00	0.04	0.98
Coastal Sage-Chaparral Transition (37G00)	0.07	0.07	0.71
Diegan Coastal Sage Scrub (32500)	0.08	0.47	1.32
Diegan Coastal Sage Scrub – Disturbed (32500)	0	0	3.66
Disturbed (11300)	0.02	0.75	1.80
Flat-topped Buckwheat (32800)	0	0.18	0
Southern Coast Live Oak Riparian Forest (61310)	0	0	1.23
Urban/Developed (12000)	0.19	0.19	1.06
TOTAL (acres)	**0.32**	**1.70**	**10.78**

Each vegetation community/land use cover type is described in the following sub-sections. A map showing the location and extent of vegetation communities is provided in Figure 3. Representative photographs of each vegetation community within the Project impact areas are provided in Attachment B.

All vegetation communities observed within the Project impact areas and Survey Buffer are recovering from fire damage caused by the January 2014 Colby Fire. As a result, vegetation communities remain in a post-fire transitional phase, with lower overall tree and shrub heights and, in most areas, higher abundance of nonnative species, resulting in overall lower habitat quality.

4.3.1 Coastal Sage – Chaparral Transition (Holland Code 37G00)

Coastal Sage – Chaparral Transition (CSCT) is described as a combination of Coastal Sage Scrub (CSS) and chaparral components, typically less dense than chaparral, and contains a higher proportion of broadleaved sclerophyll shrubs than CSS. Onsite, this community is dominated by California sagebrush

(*Artemisia californica*), chamise (*Adenostoma fasciculata*), rock rose (*Gutierrezia californica*), white sage (*Salvia apiana*), toyon (*Heteromeles arbutifolia*) and lemonade berry (*Rhus integrifolia*). This community appears to have once been part of CLOW where remnant coast live oak trees that are recovering from substantial fire damage remain. Shrub height and density was estimated at 60 to 70 percent and 4 to 6 feet average height. This community is generally restricted to areas outside of the Survey Area, but within the Survey Buffer, north of the site.

4.3.1 Open Coast Live Oak Woodland (Holland Code 71161)

Open Coast Live Oak Woodland (CLOW) is dominated by coast live oak (*Quercus angustifolia*) that has a canopy cover of less than 50 percent. This community was predominantly mapped within the Survey Buffer, with only 0.04 acres of CLOW occurring within the Project impact areas. This vegetation community was moderately dense, with approximately 50 to 60 percent vegetation cover primarily dominated by fire-recovering coast live oak and occasional Southern California black walnut (*Juglans californica*). Understory species include laurel sumac (*Malosma laurina*), California sagebrush, California buckwheat (*Eriogonum fasciculatum*), common phacelia (*Phacelia distans*), and nonnative grasses such as ripgut brome (*Bromus diandrus*), red brome (*Bromus madritensis*) and wild oat (*Avena fatua*). This community occurs along the north and northeastern edge of the Project impact areas.

4.3.2 Diegan Coastal Sage Scrub (Holland Code 32500)

Diegan Coastal Sage Scrub (DCSS) is typically described as a soft chapparal community, as stems are "softer" when compared to those found on typical chaparral species. This vegetation community is typically found in shallow dry soils and lower elevations ranging from sea level to 1,800 feet and generally intergrades with chaparral. Co-dominant species documented within the DCSS found within the Project impact areas and Survey Buffer included California sagebrush, white sage (*Salvia apiana*), deerweed (*Acmispon glaber*), saw-toothed goldenbush (*Hazardia squarrosa*), and laurel sumac. Species dominance, height and percent vegetation cover was variable throughout the Project impact areas and Survey Buffer. Spaces between native shrubs were generally dominated by nonnative grass species. DCSS is the dominant native vegetation community within the Project impact areas and occurs along the western, southern and eastern portions of the Project impact areas and Survey Buffer.

4.3.3 Diegan Coastal Sage Scrub - Disturbed (Holland Code 32500)

This vegetation community is very similar to DCSS described above, but as a result of more severe degradation, likely due to fire damage, this community had lower overall habitat quality. Disturbed DCSS was restricted to the Survey Buffer and contained a lower overall vegetation cover, lower species diversity, higher non-native species cover and signs of disturbances. Within this vegetation community, non-native grass species were more dominant and shortpod mustard (*Hirschfeldia incana*) than DCSS. Additionally, regrowth of several Southern California black walnut were documented within this community, indicating that it may have been better classified as California Walnut Woodland, prior to the Colby Fire.

4.3.4 Disturbed (Holland Code 11300)

Disturbed habitat consists of low-growing, ruderal vegetation associated with urban development. These areas are regularly maintained that limits vegetative growth, particularly to native species, due to regular maintenance and mechanical clearing. Vegetation within this community is heavily dominated by nonnative species such as wild oat, ripgut brome, Russian thistle (*Salsola tragus*), African fountaingrass

(*Pennisetum setaceum*), among many other nonnative species.

4.3.5 Flat-topped Buckwheat Scrub (Holland Code 32800)

Flat-topped Buckwheat Scrub (FTBS) is almost exclusively dominated by California buckwheat with sparse growth of deerweed and patchy, bare ground. This community is often associated with previously disturbed areas and within the Project impact areas, is isolated to the cut slope historically graded during the construction of the old water tower within the center of the Project impact areas. Average shrub cover is approximately 30 percent with an average height of 2 feet.

4.3.5 Southern Coast Live Oak Riparian Forest

Southern Coast Live Oak Riparian Forest (SCLORF) does not occur within the Project impact areas and is restricted to the northern portion of the Survey Buffer. This vegetation community qualifies as a CDFW Riparian Habitat. This community also shows signs of damage from the Colby Fire of 2014 and is in post-fire recovery. Dominant species include mature coast live oak, western sycamore (*Platanus racemosa*) with occasional Southern California black walnut. The shrub layer is dominated by a mixture of laurel sumac, California sagebrush, Nevin's brickellbush (*Brickellia nevinii*) with an abundant herb later composed of nonnative grasses, including ripgut brome, wild oat, smilo grass (*Stipa miliacea*), and red brome.

4.3.6 Urban/Developed (Holland Code 12000)

Within the Project impact areas and Survey Buffer, this vegetation community included existing development and associated ornamental plantings which are nearly or entirely devoid of native vegetation and show significant evidence of intentional, human caused conversion of previously existing natural habitats into development. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that often require irrigation. This vegetation community typically includes unvegetated or landscaped areas with a variety of ornamental (usually non-native) plants (Oberbauer 2008).

Urban/Developed areas are associated with the existing water tank, paved roadways and residential homes to the south of the Project impact areas that contain varying densities of landscaped, non-native trees and hedges or hardscape. Various ornamental species were observed within this community type including but not limited to cycad (*Cycas* sp.), crimson bottlebrush (*Callistemon citrinus*), paper flower (*Bougainvillea glabra*), and African fountain grass.

4.4 Special-Status Species

A total of 13 special-status plant species and 10 special-status wildlife species occurrences were found within a three-mile radius of the Project impact areas through the CNDDB, USFWS, CNPS, IPAC, and eBird occurrence record review (Figure 5). The Project does not fall within Critical Habitat for any wildlife or plant species. Special-status species that were evaluated for this Project and associated PFO of each species are described in Table 3 below. Special-status species that were evaluated for this Project include the following:

Plants

- **California satintail** (*Imperata brevifolia*)
- **Chaparral ragwort** (*Senecio aphanactis*)
- **Greata's aster** (*Symphyotrichum greatae*)

- **Many-stemmed dudleya** (*Dudleya multicaulis*)
- **Mesa horkelia** (*Horkelia cuneata var. puberula*)
- **Parry's spineflower** (*Chorizanthe parryi* var. *parryi*)
- **San Gabriel Bedstraw** (*Galium grande*)
- **San Gabriel Mountains dudleya** (*Dudleya densiflora*)
- **Slender horned spineflower** (*Dodecahema leptoceras*)
- **Slender mariposa lily** (*Calochortus clavatus* var. *gracilis*)
- **Sonoran maiden fern** (*Thelypteris puberula* var. *sonorensis*)
- **Thread-leaved brodiaea** (*Brodiaea filifolia*)
- **White rabbit-tobacco** (*Pseudognaphalium leucocephalum*)

Wildlife

- **Arroyo chub** (*Gila orcuttii*)
- **Big free-tailed bat** (*Nyctinomops macrotis*)
- **Coast range newt** (*Taricha torosa*)
- **Coastal California gnatcatcher** (*Polioptila californica californica*)
- **Pallid bat** (*Antrozous pallidus*)
- **Southern California rufous-crowned sparrow** (*Aimophila ruficeps canescens*)
- **Southwestern willow flycatcher** (*Empidonax traillii extimus*)
- **Two-striped gartersnake** (*Thamnophis hammondii*)
- **Western mastiff bat** (*Eumops perotis californicus*)
- **Western yellow bat** (*Lasiurus xanthinus*)

The CNDDB also documented Plummer's Mariposa Lily (*Calochortus plummerae*) and Robinson's peppergrass (*Lepidium virginicum* var. *robinsonii*), San Gabriel chestnut (*Glyptosoma gabrielense*) and Crotch bumble bee (*Bombus crotchii*). These species are not addressed herein as they do not meet criteria outlined in Section 2 as sensitive species. The hoary bat (*Lasiurus cinereus*) was not evaluated as it is not listed as an animal species designated as Species of Special Concern (SSC) by the CDFW and/or a Bat species designated as High Priority (H) by the Western Bat Working Group.

4.4.1 Special-Status Plant Species

The literature search resulted in 13 special-status plant species within a three-mile radius of the Project impact areas. The initial draft BLR (August 2023) determined that five special-status plant species had a low potential to occur within the Project impact areas and two species were determined to have moderate potential to occur, prior to conducting focused rare plant surveys:

- **Moderate PFO:** Slender mariposa lily and thread-leaved brodiaea.
- **Low PFO**: Graeta's aster, many-stemmed dudleya, Parry's spineflower, San Gabriel bedstraw, and white rabbit tobacco.
- **Absent PFO**: California satintail, chaparral ragwort, mesa horkelia, San Gabriel Mountains dudleya, slender horned spineflower, and Sonoran maiden fern.

Based on the results of the literature review, a focused rare plant survey was within the Project impact areas and a 50-foot survey buffer, primarily focusing rare plant species with a low to moderate PFO within the Project site. This survey was conducted on June 1, 2023, by Blackhawk biologists Ryan Quilley and Dustin Janeke, and included cataloging all plant species observed within the Project site, including those presumed to be absent and possibly other rare species that may not yet be known within three

miles of the Project site. None of the species identified in the literature review, as well as any other rare plant species were observed at the time of the survey and are therefore considered absent from the Project Site. The results of the rare plant survey, including detailed methodology, species PFO, and a complete plant species list are further discussed in the Focused Rare Plant Survey Report included as an attachment to this report (Attachment E). **No rare plant species were documented to occur within the Project site and associated 50-foot survey buffer and therefore are considered absent.**

4.4.2 Special-Status Wildlife Species

The literature search documented ten special-status wildlife species within a three-mile radius of the Project impact areas. This total includes one fish, two reptilian, three avian and four mammalian species. Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens;* RCSP) was confirmed present within the Project and Survey Buffer. The coastal California gnatcatcher (*Polioptila californica californica*) was determined to have a low potential for occurrence. Pallid bat (*Antrozous pallidus*) and western mastiff bat (*Eumops perotis californicus*) were determined to be absent for nursery roosts, with a low potential for foraging within the Project impact areas. Big free-tailed bat (*Nyctinomops macrotis*) was determined to have a low potential for roosting and foraging. The remaining five wildlife species evaluated were determined to be absent (Table 3).

Each of these species, along with their listing statuses, relative abundances, habitat associations and general locations within the Project impact areas and Survey Buffer, are described in Table 3 below. Wildlife species that were presumed absent, as described in Table 3 are not discussed further in this report. There were no narrow endemic, federal or state-listed wildlife species observed within the Survey Area.

4.5 Special-Status Vegetation Communities

A total of four CDFW special-status vegetation community (natural communities) occurrences were found within a three-mile radius of the Project impact areas through the CNDDB review (Figure 4). These include the following:

Vegetation Communities

- Canyon Live Oak Ravine Forest
- Riversidian Alluvial Fan Sage Scrub
- Southern Coast Live Oak Riparian Forest
- Southern Sycamore Alder Riparian Woodland

One of the four special-status vegetation communities was documented within the Survey Buffer: 1.23 acres of Southern Coast Live Oak Riparian Forest; however, as shown in Table 1 and Figure 3, Project implementation would not result in temporary or permanent impacts to this vegetation type. All other vegetation communities within the Project survey area are not considered to be special status according to USFWS or CDFW. Therefore, no impacts to state or federally designated special status vegetation communities would occur. The City of Glendora considers woodlands and sage scrub communities to be sensitive habitat; project implementation will result in 0.47 acres of temporary impacts and 0.08 acres of permanent impacts to Diegan Coastal Sage Scrub, and 0.04 acres of temporary impacts to Open Coast Live Oak Woodland that may qualify as sensitive habitat under the Glendora Community Plan.

Table 3. Special-Status Species Potential for Occurrence

PLANTS			
Species Name	**Listing Status**	**Habitat Requirements [1]**	**Potential for Occurrence**
California satintail *Imperata brevifolia*	Federal: None State: None CRPR: 2B.1	Perennial rhizomatous herb found in mesic habitat of chaparral, coastal sage scrub, Mojavean desert scrub, and riparian scrub communities. Also found in meadows and seeps (often alkali). Blooms: Sep-May Elevation: 0-1,215 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
Chaparral ragwort *Senecio aphanactis*	Federal: None State: None CRPR: 2B.2	Annual herb found in alkaline chaparral, cismontane woodland, and coastal sage scrub habitats. Blooms: Jan-May Elevation: 15-800 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
Greata's aster *Symphyotrichum greatae*	Federal: None State: None CRPR: 1B.3	Perennial herb that is endemic to the San Gabriel Mountains along the southern slopes above the Los Angeles Basin. This species occurs within damp canyons in chaparral habitat. Blooms: Jun-Oct Elevation: 300-2,000 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
Many-stemmed dudleya *Dudleya multicaulis*	Federal: None State: None CRPR: 1B.2	Perennial herb found in clay soils in chaparral, coastal scrub and valley and foothill grassland communities. Blooms: Apr-Jul Elevation: 15-260 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
Mesa horkelia *Horkelia cuneata var. puberula*	Federal: None State: None CRPR: 1B.1	Sparsely hairy, matted forb that occurs in dry, sandy or gravelly areas within coastal chaparral, scrub and cismontane woodlands.	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.

		Blooms: Feb-Jul Elevation: 45-2,280 m	
Parry's spineflower *Chorizanthe parryi* var. *parryi*	Federal: None State: None CRPR: 1B.1	Annual herb found in sandy or rocky openings in chaparral, coastal scrub, cismontane woodland, and valley and foothill grassland communities. Blooms: May-Jun Elevation: 90-800 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
San Gabriel bedstraw *Galium grande*	Federal: None State: None CRPR: 1B.2	Perennial herb found in oak woodland and chaparral, as well as yellow pine and mixed evergreen forest communities. Bloom: May-Jul Elevation: 425-1,220 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
San Gabriel Mountains dudleya *Dudleya densiflora*	Federal: None State: None CRPR: 1B.1	Perennial herb endemic to the mouth of the San Gabriel Canyon where it is found growing in cracks of granite slopes of three to five canyons within this mountain range. The habitat of this species consists of sheer rock faces, cliffs and canyon walls, usually composed of granite. Blooms: Mar-Jun Elevation: 300-2290 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
Slender horned spineflower *Dodecahema leptoceras*	Federal: **FE** State: **SE** CRPR: 1B.1	Annual herb found in sandy soil in association with mature alluvial scrub. In the Vail Lake area this species is also associated with gravel soils of Temecula arkose deposits in association with open chamise chaparral. The ideal habitat appears to be a terrace or bench that receives over-bank deposits every 50 to 100 years. Blooms: Apr-Jun Elevation: 200-700 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.

Slender mariposa-lily *Calochortus clavatus* var. *gracilis*	Federal: None State: None CRPR: 1B.2	Perennial rhizomatous herb found in shaded canyons within chaparral communities. Blooms: May-Jun Elevation: 0-1,000 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
Sonoran maiden fern *Thelypteris puberula* var. *sonorensis*	Federal: None State: None CRPR: 2B.2	Perennial fern found near streams and seepage areas within meadow and riparian communities Elevation: 50-800 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
Thread-leaved brodiaea *Brodiaea filifolia*	Federal: **FT** State: **SE** CRPR: 1B.1	Perennial herb found in grassland and vernal pool habitats. Also associated with freshwater wetland, coastal sage scrub, foothill woodland, and wetland-riparian communities. Blooms: Mar-Jun Elevation: 25-860 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.
White rabbit-tobacco *Pseudognaphalium leucocephalum*	Federal: None State: None CRPR: 2B.2	Biennial or short-lived perennial herb found in chaparral and coastal sage scrub habitats, often associated with sandy or gravelly benches, dry stream bottoms and canyon bottoms. Blooms: Jul-Oct Elevation: 0-500 m	**Absent.** This species was confirmed absent from the Project Site and Survey Buffer during the focused rare plant survey.

WILDLIFE			
Species Name	**Listing Status**	**Habitat Requirements [1]**	**Potential for Occurrence**
VERTEBRATES			
Fish			
Arroyo chub *Gila orcuttii*	Federal: None State: None; CDFW-SSC	Found in small, cool, shallow, permanent streams in water ranging in depth from a few centimeters to a meter or more. Preferred substrates are generally coarse and consist of gravel, rubble, and boulders with growths of filamentous algae, but occasionally they are found on sand/mud substrates.	**Absent.** This species is confined to permanent streams that are absent from the Project impact areas or Survey Buffer.
Reptiles			
Coast range newt *Taricha torosa*	Federal: None State: None; CDFW-SSC	Found in chaparral, oak woodland, and grassland habitats no further than one to two miles from a water source that is required for breeding, egg-laying, and larval development. Breeding occurs in ponds, reservoirs, and pools of low gradient streams.	**Absent.** Suitable breeding areas are absent from within 1 mile of the Project impact areas. Riparian habitat that occurs outside of the Survey Area (to the east and west) is too steeply sloped and ephemeral in nature to support source populations of this species.
Two-striped gartersnake *Thamnophis hammondii*	Federal: None State: None; CDFW-SSC	Found near pools, creeks, cattle tanks, and other water sources within oak woodland, riparian scrub, coastal sage scrub, sparse coniferous forest, chaparral, and grassland habitats.	**Absent.** Suitable habitat for this species is absent from present within the Project impact areas and Survey Buffer. Though potentially suitable Southern Coast Live Oak Riparian Forest occurs within the Survey Buffer, the waterway is very steeply sloped (25-35%) and water sources are not sufficiently persistent to support this species.

Birds			
Coastal California gnatcatcher *Polioptila californica californica*	Federal: **FT** State: None; CDFW-SSC	Found in coastal sage scrub communities but will also utilize other habitats where coastal sage scrub species forms some component. Preferred habitat consists of vegetation with a gap rate of about 25% between mature shrubs from three to five feet tall.	**Low.** Two fairly recent (2004, 2012) occurrence of this species occur 2.99 miles from the Project impact areas. Marginally suitable coastal sage scrub and coastal sage chaparral scrub exist within the Project impact areas and Survey Buffer; however, is located along very steep slopes and largely disconnected from known populations of this species.
Southern California rufous-crowned sparrow *Aimophila ruficeps canescens*	Federal: None State: None; CDFW-WL	Found in coastal lowlands and foothills in sage scrub, open or burned chaparral, and grassland with scattered shrubs. Typical habitat is fairly steep south-facing slopes with about 50% cover of low shrubs. Sage scrub on gentle rolling hillsides is even more favorable but now greatly reduced and fragmented.	**Present.** This species was observed in numerous locations within the Project impact areas and Survey Buffer. Suitable nesting habitat is abundant within the site.
Southwestern willow flycatcher *Empidonax traillii extimus* (nesting)	Federal: FE State: SE	Restricted to riparian woodlands along streams and rivers with mature, dense stands of willows, cottonwoods, or smaller spring fed or boggy areas with willows or alders.	**Absent.** Designated critical habitat for this species occurs approximately 1.5 miles to the west of the Project impact areas, associated with Morris Canyon riparian forest habitat. Known occurrences of this species are absent from within 3 miles of the Project. Suitable, mature riparian woodlands with appropriate vertical structure to support nesting is absent from the Project impact areas.
Mammals			
Big free-tailed bat *Nyctinomops macrotis*	Federal: None State: None; CDFW-SSC	Occurs in a variety of habitat types, including coastal sage scrub, pine-oak woodlands, and rocky canyon lands. Forages on a variety of insects in flight.	**Low (nursery roosts and foraging).** A single historical occurrence of this species was recorded within 3 miles of the Project impact areas in 1997. Suitable foraging habitat is present within the Project

		Roosts primarily in high rocky outcrops, rugged cliffs, and rock-strewn slopes, but will also roost in caves, crevices, mines, tunnels, abandoned buildings, roof tiles, and other structures.	impact areas and Survey Buffer; however, suitable roosting sites were not observed.
Pallid bat *Antrozous pallidus*	Federal: None State: None; CDFW-SSC	Forages within a number of habitat types, frequently by pursuing insects while walking on the ground. Most commonly associated with arid open scrub or grassland and gentle terrain with scattered rocky outcrops. Can also be found in higher elevation coniferous forests on steep terrain. Often occurs on oak- and sycamore-lined flood plain terraces at low elevations in the inland valleys. Uses some agricultural areas for foraging. Roosts in man-made structures, rock and sandstone crevices and caves, under tree bark, and in rodent burrows or crevices in the ground.	**Absent (nursery roosts), Low (foraging).** Two historical occurrences occur within 3 miles of the Project impact areas; documented in 1904 and 1936, with both locations recorded in what is now urban sprawl associated with the City of Glendora. Suitable arid open scrub, grassland on gentle terrain, coniferous forests on steep terrain, or oak and sycamore line flood plain terraces were not documented within the Project impact areas or Survey Buffer.
Western mastiff bat *Eumops perotis californicus*	Federal: None State: None; CDFW-SSC	Occurs in many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, annual and perennial grasslands, palm oases, chaparral, desert scrub, and urban. Roosts in crevices in cliff faces, high buildings, trees, and tunnels. When roosting in rock crevices, it needs vertical faces to drop off to take flight. Nursery roosts described as tight rock crevices at least 35 inches deep and two inches wide, or crevices in buildings. Suitable habitat consists of extensive open areas with abundant roost locations provided by crevices in rock outcrops and buildings. Is known to forage over 25 miles away	**Absent (nursery roosts).** Two CNDDB occurrences of this species exist within 3 miles of the Project impact areas, documented in 1958 and 1964, and are associated with areas that are now within fully developed portions of the City of Glendora. Suitable rock crevices at least 35 inches deep and two inches wide, or crevices in buildings were not observed within the Project impact areas. There is a low potential for roosts to exist in adjacent habitat outside of the Survey Buffer. **Moderate (foraging):** Presence of suitable foraging habitat is present within the Project impact areas and Survey Buffer. Considering this species is

		from its roost site (Zeiner et al 1988).	known to forage more than 25 miles from roost sites, there is a moderate potential for this species to forage within the Project impact areas.
Western yellow bat *Lasiurus xanthinus*	Federal: None State: None; CDFW-SSC	Forages over water and among trees in coastal, foothill, and desert riparian areas, and in suburban neighborhoods. Roosts are commonly in palm trees, and occasionally in cottonwood trees or yuccas, often near surface water in open grassy areas or scrub habitat.	**Absent (nursery roosts and foraging).** Three CNDDB occurrences of this species exist within 3 miles of the Project impact areas, documented in 1906, 1925 and 1987, and are associated with areas that are now within fully developed portions of the City of Glendora. Suitable roost locations were not observed within the Project impact areas or Survey Buffer. Furthermore, open water habitat is absent from the Project impact areas and Survey Buffer.

4.6 Riparian Resources and Jurisdictional Resources

The literature review identified potential riparian resources within the Survey Area (Figure 3). Two large canyons occur adjacent to the Project impact areas to the northeast and southwest, approximately 80 feet and 370 feet, respectively from the closest Project limits. These canyon areas contain riparian vegetation and other hydrologic features that likely meet the standards of a Jurisdictional Waterway of the U.S. and State of California. The Project does not propose impacts to these Jurisdictional features. No riparian resources or Jurisdictional Waterways were documented within the proposed impact areas of the Project, therefore impacts to riparian resources would not result from development of the proposed Project.

5.0 PROJECT IMPACTS - THRESHOLDS OF SIGNIFICANCE, DIRECT/INDIRECT IMPACTS & TEMPORARY/ PERMANENT IMPACTS

This section of the report includes a discussion of the potential direct, indirect, and cumulative impacts to onsite special-status biological resources that may result upon the construction and implementation of the Project. Direct impacts include those involving the loss, alteration, and/or disturbance of plant communities, and consequently, the flora and fauna of the affected area. Direct impacts also include the destruction of individual plants and/or wildlife. Direct impacts may adversely affect regional populations of certain species, or result in isolated populations, reducing genetic diversity and range wide population stability: conversely, direct impacts may also have intended or unintended positive effects in some cases.

Indirect impacts include a variety of effects related to areas or habitats that are not directly removed by Project development, such as loss of foraging habitat, increased ambient noise, artificial light, introduced predators (e.g., domestic cats, dogs and other non-native animals), competition with exotic plants and animals, increased human presence and associated disturbances (e.g., trash, green waste, physical intrusion). Indirect impacts may include long and/or short-term daily activities associated with Project build-out, such as increased traffic, permanent barriers or fences, buildings, exotic seed-bearing ornamental plantings, irrigated landscapes and human presence, among others. These types of impacts are known as edge effects and over time, may result in some encroachment on native plants by exotic plants, altered behavioral wildlife patterns, reduced wildlife diversity, and decreased wildlife abundance in habitats adjacent to a given project site. Furthermore, as is the case with direct impacts, indirect impacts may also have intended or unintended positive effects for certain species.

The foreseeable potential for significant adverse effects, either directly or indirectly through habitat modification or conversion, on any special-status vegetation community, plant species or wildlife species, or that could occur as a result of the development of this Project is discussed within this section.

5.1 Project Impacts

This section provides definitions and discussion of the various Project-related impacts that are anticipated to occur.

5.1.1 Habitat Impacts

Construction of the proposed Project will result in permanent habitat loss and short-term disturbances

associated with the construction of new water tanks and the construction laydown area. Temporary impacts will also result from initial grubbing, clearing and grading of cut and fill slopes associated with site preparation. Permanent impacts will result from expansion of the current limits of hardscape (pavement and structures) and these developed areas will result in native habitat loss. In order to mitigate habitat loss and comply with provisions in the Glendora Community Plan 2025 Conservation Element, temporary impact areas may be restored using native seed and plantings that mimic the existing and surrounding vegetation communities.

The estimated acreages of proposed impacts resulting from construction are provided in Table 1. These impacts would include temporary impacts to 0.04 acre of Open Coast Live Oak Woodland, 0.07 acre of Coastal Sage-Chaparral Transition, 0.47 acre of Diegan Coastal Sage Scrub, 0.75 acre of Disturbed, 0.18 acre of Flat-topped Buckwheat, and 0.19 acre of Urban/Developed vegetation community, Additionally, the Project would result in permanent impacts to 0.07 acre of Coastal Sage-Chaparral Transition, 0.08 acre of Diegan Coastal Sage Scrub, 0.02 acre of Disturbed, and 0.19 acre of Urban/Developed vegetation community. None of the habitats that would be impacted by the Project are considered sensitive natural communities by CDFW or USFWS. Per the local Glendora Community Plan 2025 Conservation Element, woodlands and sage scrub are considered sensitive; implementation will result in impacts to these two vegetation communities.

5.1.2 Species Impacts

Short-term (Temporary) Construction-Related Direct & Indirect Impacts

Absent Mitigation measures recommended in Section 6, potential direct impacts to special-status biological resources may occur as a result of construction of the proposed Project. These impacts could include wildlife entrapment, killed or injured wildlife and unauthorized grading or vegetation removal. These activities have the potential to occur for any number of reasons, including lack or absence of Project design staking, inadequate or unmaintained demarcation of proposed impacts areas, misinterpretation of Project designs, and human error in operating equipment. Dependent on construction methodology, impacts resulting from wildlife entrapment may occur within Project impact areas where excavations remain open and un-sealed for extended periods. Wildlife injuries and mortalities have the potential to occur as a result of any of the previously discussed reasons but are also an inherent risk when working in proximity to undisturbed areas during activities such as initial vegetation clearing and ground disturbance.

The Project impact areas and Survey Buffer provides suitable nesting habitat for a variety of native avian species associated with CLOW, CSCT, DCSS, Disturbed, FTBS, SCLORF and ornamental vegetation associated with Urban/Developed habitat. Suitable nesting habitat for raptor species identified during the survey consisted of moderate to tall native and ornamental trees surrounding the project vicinity. Additional raptor nesting habitat observed included man-made radio towers that occur immediately adjacent to the existing water tower. Open habitat documented within the Project impact areas and Survey Buffer also provides suitable habitat for ground nesting birds and those that nest in shrublands. Implementation of the proposed Project has the potential to indirectly or directly impact nesting birds if active nests are present within the Project impact areas and vicinity during construction.

Potential indirect impacts as a result of construction of the proposed Project also include non-stormwater discharges resulting from spills or leaks, attracting predators, stormwater discharges, dust, noise and lighting. Operations and maintenance are not a component of the Project as the permanent impact areas will be converted into hard structures in the form of paved areas and water storage tanks.

Temporary work areas will be restored with native plant species to aid in slope stability and mitigate native habitat loss. Without implementation mitigation measures, impacts as a result of the proposed Project could include non-stormwater discharges resulting from spills or leaks and stormwater discharges from sediment laden runoff into adjacent water systems. Without proper implementation of a best management practices and/or a SWPPP there may be a potential for short-term urban discharge. These impacts are considered to be less than significant by implementation of recommended mitigation measures outlined in Section 7 and with implementation of requirements of the Glendora Community Plan – 2025 – Conservation Element.

Direct impacts to special-status wildlife species and migratory birds may occur as a result of direct impacts to individuals, including individuals, nests or roosts, which may occur during vegetation, soil and debris removal. Absent mitigation, Project-related impacts to special-status species and migratory birds is potentially significant.

Long-term (Permanent) Direct and Indirect Impacts

Direct impacts associated with the long-term development of the Project would primarily be restricted to expansion of existing disturbed or developed areas that account for 57 percent of total permanent impacts. Some permanent loss of native habitat will occur as a result of the construction of permanent structures. The proposed Project will result in temporary and permanent impacts to moderate-quality DCSS (Permanent: 0.08 acres, Temporary: 0.47 acres), FTBS (Permanent: 0.03 acres, Temporary: 0.18 acres), Coast Live Oak Woodland (Permanent: 0 acres, Temporary: 0.04 acres), Coastal Sage – Chaparral Transition (Permanent: 0 acres, Temporary: 0.07 acres) which account for 43 percent of total permanent and temporary impacts. Impacts to sensitive vegetation communities: "Coastal Sage Scrub and Woodlands" (per the Glendora Community Plan 2025 Conservation Element) may require compensatory mitigation or onsite restoration.

According to the Community Plan, woodland and coastal sage scrub habitats are considered to be sensitive habitats. Loss of sensitive habitat (Open Coast Live Oak Woodland and Diegan Coastal Sage Scrub) as a result of Project construction may be offset through onsite restoration and enhancement of temporary impact areas and/or mitigating habitat impacts through an offsite mitigation bank. If temporary impact areas containing non-sensitive habitat types (i.e. CSCT and FTBS), per the Community Plan, were restored with sensitive habitats onsite restoration of temporary impact areas would provide a 30 percent net increase of these habitat types (sensitive habitat restored at a 1:1.3 ratio). If temporary impact areas do not recover to their pre-construction condition or better, Project implementation would result in permanent sensitive habitat loss of 0.47 acres of DCSS, 0.04 acres of CLOW. Habitat onsite is currently degraded from fire damage and through restoration and enhancement efforts, temporary impact areas are expected to provide higher quality habitat than that which currently exists. Therefore, temporary and permanent impacts to native habitat types would be offset through restoration and enhancement and would not pose a significant impact to the ecological balance of the region.

Based on the findings of the Focused Rare Plant Report (Attachment E), no rare plants were identified within the Project Site or the 50-foot Survey Buffer during the focused rare plant survey on June 1, 2023. Therefore, the Project will not result in any direct or indirect impacts to rare plants.

Two native tree species occur within the proposed Project impact areas: three Southern California black walnut and one mature coast live oak (Figure 5). If avoidance of these trees is not feasible, the loss of four individual native trees is not considered to be a significant adverse permanent impact, and these individuals are not protected by Federal, State or Local regulations.

Long-term (Permanent) Indirect Impacts

Potential for impacts to species occupying adjacent native habitat from increased noise and light associated the proposed permanent structures is not anticipated. Once the proposed water towers are constructed, noise and light levels are expected to be consistent with ambient levels that currently exist at the water facility. Considering these factors, it is fair to presume that any native wildlife species occupying adjacent lands have become accustomed to a similar level of anthropogenic disturbance and therefore these impacts are not considered to be significant.

Other long-term indirect impacts as result of the proposed Project could include stormwater discharges from sediment laden runoff into municipal storm drain systems. Without proper stormwater management systems incorporated in the construction design, consistent with state and local requirements, there is a potential for long term urban discharge. The Project construction design includes permanent on-site stormwater management systems and therefore long-term indirect impacts from stormwater discharge are considered less than significant.

5.2 CEQA Thresholds of Significance

This section is divided into sub-sections that include direct and indirect impacts analysis for each threshold under CEQA.

5.2.1 CEQA Threshold Biology - 1

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

The proposed Project has the potential for indirect impacts to special-status plant and limited direct impacts wildlife species detailed in Table 3. The biological resource assessment determined that absent mitigation measures outlined in Section 6 below, there is potential for direct and indirect impacts to special-status plant and wildlife species and their associated habitats.

The biological resource assessment evaluated the Project impact areas and Survey Buffer for sensitive wildlife documented to occur within the vicinity and determined that one special-status wildlife species is present and three special-status wildlife species have a low to moderate potential to occur (Table 3). Additionally, there is potential for migratory birds to occur within the Project area, which are considered a protected wildlife species.

The initial literature review indicated moderate potential for rare plants to occur within the Project impact area and vicinity, therefore a focused rare plant survey was conducted (Attachment E). No special status plants were documented in the Project impact areas or Survey Buffer, therefore temporary or long-term direct impacts to Special Status plant species are not anticipated as a result of Project implementation. However, considering that it is unknown if special-status plants occur beyond the Study Area, potential indirect impacts may occur.

Biology Impact 1 – Temporary Indirect Impacts to Special-Status Species and Migratory Birds

Special-Status Plants

Special-status plant species were found absent from the Project site and Survey Buffer; therefore, the Project is not anticipated to result in direct impacts to special-status species. However, several species are known to occur within the region and may exists beyond the Study Area (Table 3). Impacts to undocumented populations that may exist beyond the Study Area cannot be accurately quantified. It is reasonable to assume that temporary indirect impacts to special-status plant species (if present beyond the Study Area) may occur as a result of offsite sedimentation and erosion, pollution, debris, dust and/or unauthorized construction activities occurring beyond the proposed impact limits. Absent Mitigation measures, Project related impacts to special-status plant species is potentially significant; however, with implementation of Mitigation Measure BIO-1, BIO-3, BIO-4, and BIO-5 potential temporary indirect impacts to the special-status plants listed in Table 3 would be reduced to less than significant. Therefore, impacts to special-status plant species would be less than significant.

Special-Status Wildlife

One special-status wildlife species was identified in the Study Area during the Project site survey: Southern California rufous-crowned sparrow. The coastal California gnatcatcher was determined to have a low potential for occurrence. Pallid bat and western mastiff bat were determined to be absent for nursery roosts, with the pallid bat having a low potential to forage and western mastiff bat having a moderate potential to forage within the Project impact areas. Big free-tailed bat was determined to have a low potential for roosting and foraging. All other special-status species evaluated for the Project are presumed absent. There were no narrow endemic, federal or state-listed wildlife species observed within the Survey Area. No other special-status species were identified as potentially present on the Project site. For the purposes of CEQA, species determined to have low potential or to be absent from the site do not require further study or mitigation.

Portions of the proposed Project impact areas (DCSS, FTBS and CSCT habitat types described in Section 4.3) were occupied by the Southern California Rufous-crowned sparrow (CDFW SSC species) during the biological assessment. A combined total of 0.87 acres of suitable habitat for this species will be temporarily impacted during construction activities, therefore, temporary indirect impacts to Southern California rufous-crowned sparrow are anticipated from temporary loss of nesting and foraging habitat. Expansive CSS, FTBS and CSCT habitats surround the Project, providing high-quality, suitable habitat for this species to temporarily relocate and utilize for the duration of temporary impacts, therefore, temporary indirect impacts to this species are considered less than significant. All temporary impact areas will be restored and enhanced per Mitigation Measure BIO-6 that will offset any long-term impacts to this species.

Temporary indirect impacts to other special-status wildlife species and birds protected under the MBTA that were determined to have potential for occurrence within the Study area (Table 3) may occur as a result of increased noise, lighting, construction dust, increased predator pressure, and loss of foraging habitat. Furthermore, several special status wildlife species, known to occur within the region, could occupy areas beyond the Study Area. Therefore, temporary indirect impacts to special-status wildlife species may result in stormwater discharges of sediment laden water to downstream drainages that has the potential to modify and/or degrade downstream special-status wildlife habitat located outside of the Project limits and Study Area. Other potential indirect impacts as a result of Project implementation may also include non-stormwater discharges resulting from spills or leaks that could pollute adjacent habitat. By implementation of Mitigation measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5 and stormwater management design elements discussed in Section 5.1 and 6, potential long-term indirect impacts to special-status species listed above would be reduced to less than significant. Therefore, temporary indirect impacts to special-status wildlife species would be less than significant.

Biology Impact 2 – Temporary Direct Impacts to Special-Status Species and Migratory Birds

Special-Status Plants

The focused rare plant survey determined special-status plants were absent from Project impact areas and the Survey Buffer, therefore temporary or long-term direct impacts to special-status plant species are not anticipated as a result of Project implementation.

Special-Status Wildlife

Direct impacts to Southern California rufous-crowned sparrows and migratory birds may occur as a result of direct impacts to individuals, nests or roosts, which may occur during vegetation, soil and debris removal. Absent mitigation measures, Project-related impacts to Southern California rufous-crowned sparrow and migratory birds is potentially significant; however, with implementation of BIO-1, BIO-2, BIO-4 and BIO-5 impacts are likely to be less than significant.

Biology Impact 3 – Long-Term Indirect Impacts to Special-Status Species and Habitats

Special-Status Plants

Given that the Project impact area does not contain special-status plant species, Project implementation will not result in the loss of any portion of a special-status plant population, thereby preventing any potential indirect impact to range wide plant populations. Furthermore, the Project design incorporates stormwater conveyance systems that will prevent potential long-term indirect impacts from offsite sedimentation and erosion, pollution, debris and dust, that could affect undocumented special-status plants that may occur beyond the Study Area. Therefore, long-term indirect impacts to special-status plant species are not anticipated and considered less than significant.

Special-Status Wildlife

Potential for long-term indirect impacts to species occupying adjacent native habitat from increased noise and light associated the proposed permanent structures is not anticipated. Once the proposed water towers are constructed, noise and light levels are expected to be consistent with ambient levels that currently exist at the water facility. Considering these factors, it is fair to presume that any native wildlife species, including special-status species, occupying adjacent lands have become accustomed to a similar level of anthropogenic disturbance and therefore these impacts are not considered to be significant.

Similar to impacts discussed above for special-status plant species, other long-term indirect impacts to wildlife as result of the proposed Project could include stormwater discharges from sediment laden runoff into municipal storm drain systems. Without proper stormwater management systems incorporated in the construction design, consistent with state and local requirements, there is a potential for long term urban discharge. The Project construction design includes permanent on-site stormwater management systems and therefore long-term indirect impacts to special-status wildlife from stormwater discharge are considered less than significant.

Portions of the proposed Project impact areas (DCSS, FTBS and CSCT habitat types described in Section 4.3) were occupied by the Southern California rufous-crowned sparrow (CDFW SSC) during the biological assessment. Habitat within the proposed Project impact limits has been degraded by the 2014 Colby wildfire and abundant non-native annual species. A combined total of 0.87 acres of suitable

habitat for the Southern California rufous-crowned sparrow will be impacted during construction activities; however, through implementation of Mitigation Measure BIO-6, temporary impact areas will be restored and enhanced to offset all impacts to habitat suitable for this species as well as MBTA-covered species. Furthermore, it is anticipated that restored habitat will be of higher quality than the existing habitat and serve to provide a net benefit to the Southern California rufous-crowned sparrow and other MBTA-covered bird species that may utilize the site. By incorporating Mitigation Measure BIO-6, long-term indirect impacts are likely to be less than significant.

5.2.2 CEQA Threshold Biology - 2

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

Biology Impact 4 - Temporary Impacts to City-Designated Sensitive Natural Communities

Section 5.1.2 details temporary and permanent impacts to natural vegetation communities, including those considered sensitive by the Community Plan. None of the vegetation communities identified within the Project impact limits are considered sensitive by CDFW or USFWS. According to the Community Plan, woodland and coastal sage scrub habitats are considered to be sensitive habitats and have the highest potential to host sensitive species. Vegetation communities within the Study Area that would fall under this category include Open Coast Live Oak Woodland and Diegan Coastal Sage Scrub.

The estimated acreages of proposed impacts resulting from construction are provided in Table 1. These impacts would include temporary impacts to 0.04 acre of Open Coast Live Oak Woodland, 0.07 acre of Coastal Sage-Chaparral Transition, 0.47 acre of Diegan Coastal Sage Scrub, 0.75 acre of Disturbed, 0.18 acre of Flat-topped Buckwheat, and 0.19 acre of Urban/Developed vegetation community. However, under Measure BIO-6, habitat temporarily impacted by the Project would be replaced through revegetation. Additionally, adverse effects to adjacent riparian habitat may result from improper stormwater and non-stormwater discharge management and design. Implementation of BIO-1, BIO-3, BIO-4 and BIO-6, which include applicable conservation measures outlined in the Glendora Community Plan, are expected to reduce potential impacts to adjacent riparian habitat or water quality to less than significant levels. Therefore, the Project would result in less than significant temporary impacts with mitigation on City-protected sensitive habitats.

Biology Impact 5 - Permanent Impacts to City-Designated Sensitive Natural Communities

Additionally, the Project would result in permanent impacts to 0.07 acre of Coastal Sage-Chaparral Transition, 0.08 acre of Diegan Coastal Sage Scrub, 0.02 acre of Disturbed, and 0.19 acre of Urban/Developed vegetation community. Impacts to sensitive vegetation communities: "Coastal Sage Scrub and Woodlands" (per the Glendora Community Plan 2025 Conservation Element) will require compensatory mitigation or onsite restoration.

Loss of sensitive habitat (Coastal Sage Scrub and Woodlands) as a result of expanded pavement/development may be offset through onsite restoration and enhancement of temporary impact areas. If temporary impact areas previously containing non-sensitive habitat types (i.e. CSCT and FTBS), per the Community Plan, were restored and enhanced with vegetation to support sensitive habitats (Coastal Sage Scrub and Woodlands), onsite restoration of temporary impact areas would provide a 30 percent net increase of total Coastal Sage Scrub and Woodland area within the Project site (mitigation at a 1.3:1 ratio).

If temporary impact areas do not recover to their pre-construction condition or better, Project implementation would result in permanent sensitive habitat loss of 0.47 acres of DCSS, 0.04 acres of CLOW. Habitat onsite is currently degraded from fire damage and through restoration and enhancement efforts, temporary impact areas are expected to provide higher quality habitat than that which currently exists. Therefore, under Mitigation Measure BIO-6, temporary and permanent impacts to native habitat types would be offset through restoration and enhancement and would not pose a significant impact to the ecological balance of the region. Therefore, the Project would result in a less than significant permanent impact with mitigation on City-protected sensitive habitats.

All riparian habitat identified within the Survey Buffer will be avoided by construction activities. Therefore, potential impacts to riparian habitat or other sensitive natural community from Project implementation are unlikely. The site does not support waters considered jurisdictional by USACE, Los Angeles RWQCB and/or CDFW.

Biology Impact 6 - Indirect Impacts to Riparian and Wetland Communities

The Project is located outside of adjacent riparian and wetland communities. As discussed in Section 5.1, long-term indirect impacts to are likely to be less than significant. As a result of the incorporation of appropriate permanent on-site stormwater management design elements, SWPPP (if applicable), and implementation of BIO-1, BIO-3, BIO-4 and BIO-6, impacts are likely to be less than significant.

Biology Impact 7 – Direct Impacts to Riparian and Wetland Communities

The proposed Project was evaluated for potential direct impacts to riparian and wetland communities and the BLR did not identify riparian or wetland communities within the Project, therefore direct adverse effects to these resources are not anticipated as a result Project implementation.

5.2.3 CEQA Threshold Biology - 3

Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The BLR did not identify jurisdictional areas likely subject to regulation by USACE, Los Angeles RWQCB and/or CDFW within the Project impact areas, therefore adverse effects to these resources are not anticipated as a result Project implementation.

5.2.4 CEQA Threshold Biology - 4

Would the project 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?

Wildlife corridors are linear features that function to connect at least two significant habitat areas or larger core areas. Wildlife corridors typically apply to mammals and reptiles as aquatic wildlife generally rely on waterways for dispersal and avian species are able to fly between habitat patches by crossing developed areas. The Project is located within a region that is largely surrounded by native habitat where wildlife movement is unrestricted with the exception of urban development of Glendora. Aquatic wildlife corridors were not observed within the Survey Area. Game trails, used primarily by southern mule

deer (*Odocoileus hemionus fuliginatus*), were observed within the Project; however, this movement would not constitute a wildlife corridor as the site does not act to connect two significant or large core habitat areas. It is expected that wildlife would be able to traverse around the site, through contiguous native habitat that occurs to the east, north and west of the Project impact areas and that Project implementation would not interfere with wildlife movement, therefore short- and long-term impacts to wildlife movement are considered less than significant.

5.2.5 CEQA Threshold Biology - 5

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Glendora Community Plan 2025 Conservation Element contains regulations intended to preserve native tree species. The biological resource assessment documented one mature coast live oak and three Southern California black walnut within the Project impact areas (Figure 5). The Southern California black walnut showed significant signs of damage from the Colby Fire is in a stage of recovery. Removal of these two native tree species (four individuals) is considered less than significant and is unlikely to impact the overall regional quality of woodlands that occur adjacent to the Project. The majority of native tree species identified were outside of the proposed impact limits of the Project and will not be impacted by Project construction. Furthermore, these species are not protected under Federal, State or Local Regulations. As stated in Section 3.4 above, Chapter 16.14 of the Glendora City Urban Forestry Manual does not apply to the native trees located within the Project impact limits.

Additionally, impacts to sensitive vegetation communities: "Coastal Sage Scrub and Woodlands" (per the Glendora Community Plan 2025 – Conservation Element) requires compensatory mitigation or onsite restoration. The City has opted to offset impacts to Coastal Sage Scrub and Woodlands through onsite restoration of temporary impact areas. Through implementation of mitigation measures outlined below in Section 6, the Project is not likely to conflict with any local policies or ordinances protecting biological resources.

5.2.6 CEQA Threshold Biology - 6

Would the project conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP?

The Project, as proposed, has been designed in accordance with the Glendora Community Plan 2025 Conservation Element and is not anticipated to conflict with any applicable local, regional, or state Plans, provided the Mitigation Measures BIO-1 through BIO-6.

6.0 MITIGATION PROGRAM

6.1 Mitigation Measures for Construction Impacts

BIO-1: Delineation of Project Impact Areas

The boundaries of proposed Project impact areas will be clearly delineated with stakes, fencing or other conspicuous boundary markings, which will be maintained until the completion of construction activities, to prevent the unauthorized impact of habitat outside of Project impact areas discussed in

this report. All employees shall be instructed that their activities, vehicles, equipment and construction materials are restricted to the proposed Project footprint.

BIO-2: Conduct Vegetation Clearing/Initial Grading Outside of the Bird Nesting Season OR Conduct Pre-Construction Nesting Bird Surveys

To avoid impacts to nesting birds, special status birds and/or raptors the following will be implemented:

- Conduct vegetation removal and initial ground disturbance activities outside of the bird breeding season (February 15 – September 15).
- If vegetation removal or initial grading occurs during the breeding season, nesting bird surveys will be conducted by a qualified biologist for nesting raptors and migratory birds and within an additional 100-foot survey buffer (for passerines) and 300-foot buffer for raptors within 3 days of construction. If nests of listed birds, migratory birds, raptors, or other sensitive species are documented, active nests will be avoided, and a nest buffer will be designated around each nest. Nest buffers will be determined at the discretion of the qualified biologist based on the location and species occupying the nest. Species that are not covered by the MBTA (such as European starling, house sparrow, Eurasian collared dove, etc.) will not require a nest buffer. The perimeter of this nest buffer will be clearly demarcated, and all construction activities will be prohibited within the delineated area until a qualified biologist has determined that the nest has either successfully fledged, been depredated, or failed due to other causes. Construction activities may proceed within the non-disturbance buffer if a qualified biologist is present to monitor active nests and determines that construction activities are not causing indirect or direct disturbance to a nest.

BIO-3: Install Best Management Practices During Active Construction

Prior to initial grading or ground disturbance, the applicant will identify Best Management Practices (BMPs) and will develop a Storm Water Pollution Prevention Plan (SWPPP), if applicable, to prevent to stormwater and non-stormwater discharges. BMPs should address sediment and hazardous materials control, dewatering structures, fueling and equipment management practices, and other factors deemed necessary by reviewing agencies. Erosion control measures shall be monitored on a regularly scheduled basis, particularly during times of heavy rainfall. Corrective measures will be implemented in the event erosion control strategies are inadequate. Sediment/erosion control measures will be continued at the project site until such time as temporary impact areas of the project have been sufficiently stabilized. Stormwater management strategies will follow Community Plan measures (CON 8.1 – 8.3) and comply with all applicable local, state and federal requirements.

BIO-4: Maintain Proper Housekeeping

The Project site shall be kept clean of trash and debris throughout the construction period. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s) to limit attracting predators to the site. Pets shall not be allowed on-site to avoid potential impacts to native species that may occupy areas not being impacted by Project activities.

BIO-5: Control Fugitive Dust

Fugitive dust will be avoided and minimized through watering and other appropriate measures.

BIO-6: Restore Temporary Impact Areas

According to Planning Consideration Policy CON-9.4 of the Glendora Community Plan 2025 Conservation Element, preservation of natural plant communities in the hillside areas should be preserved. In order to comply with the Glendora Community Plan, loss of sensitive habitat (Coastal Sage Scrub and Woodlands) as a result of Project construction shall be offset through onsite restoration and enhancement of temporary impact areas. Temporary impact areas containing sensitive (DCSS and CLOW) and non-sensitive habitat types (CSCT and FTBS), shall be restored/enhanced with DCSS and CLOW to provide mitigation ratio of sensitive habitat 1.3:1 ratio.

Prior to the issuance of a grading permit the applicant will provide a Conceptual Restoration Plan (CRP) that will detail requirements for mitigating impacts to Open Coast Live Oak Woodland and Diegan Coastal Sage scrub, deemed sensitive within the Glendora Community Plan. The plan will require that temporary impact areas are restored with native vegetation to include plant species currently found on site and will be maintained until the vegetation is self-sustaining without supplemental irrigation or additional planting. Total vegetation cover should be equal to or greater than pre-construction levels. Nonnative species shall not be used during restoration planting. Weed species within the restoration area shall be controlled until the site is adequately restored per the requirements outlined in the CRP.

7.0 CONCLUSION

Five special-status wildlife species were determined to have low potential to occur within the Survey Area: coastal California gnatcatcher, pallid bat (foraging only), western mastiff bat (foraging only), and big free-tailed bat (foraging/roosts). Special-status Southern California rufous-crowned sparrow was found present within the Project impact areas.

During the initial biological resource assessment in August 2022, five special-status plant species were determined to have a low potential to occur within the Project impact area: many-stemmed dudleya, Greata's aster, white rabbit-tobacco, Parry's spineflower and San Gabriel Bedstraw. Two plant special-status plant species were determined to have a moderate potential to occur within the Project impact areas: thread-leaved brodiaea (state and federally-listed) and slender mariposa lily. Based off the findings of the focused rare plant survey performed June 1, 2023, no rare plants were found present within the Project or Survey Buffer. These seven species are therefore considered absent from the Project impact areas.

Two sensitive natural communities were identified within the Project impact areas: Diegan Coastal Sage Scrub and Open Coast Live Oak Woodland. Jurisdictional Waterways or riparian resources were not identified within the Project impact areas.

Through implementation of recommended mitigation measures outlined herein, impacts to sensitive natural communities will be offset through onsite restoration, potentially present special-status plants will be avoided and or replaced, and direct impacts to special-status wildlife will be avoided. Significant impacts to native trees are not anticipated. Environmental impacts associated with the proposed Project are expected to be less than significant, through implementation of the recommended mitigation measures.

Absent recommended mitigation measures outlined herein, the proposed Project impacts have the potential to create adverse effects on special-status plant, wildlife species, sensitive natural communities and water resources.

To the maximum extent practicable, avoidance of impacts to sensitive habitats, special-status species, and nesting birds/raptors will be achieved per the MBTA, FESA, CESA and MSPSP. Indirect effects to biological resources during and following construction are anticipated to be less than significant due to proposed minimization measures. Significant impacts to wildlife corridors are not anticipated as a result of the proposed Project. Additionally, cumulative impacts are anticipated to be less than significant due to the limited extent of disturbance and onsite mitigation of impacts to sensitive natural communities.

Proposed mitigation will include implementation of mitigation measures which include delineation of Project impact areas, conducting vegetation clearing and initial ground disturbance outside of the bird nesting season if feasible, conducting pre-construction nesting bird surveys if construction occurs during the breeding season, conducting pre-construction botanical surveys, implementing rare plant avoidance/translocation measures if necessary, installation of BMPs, proper house-keeping, fugitive dust control and native restoration of temporary impact areas.

By adhering to the mitigation measures proposed herein, no direct or indirect adverse impacts would occur to the Project site or any threatened, endangered, or otherwise special-status plant or wildlife species. Additionally, no cumulative impacts are expected to occur. Every effort to avoid impacting sensitive habitats, special-status species, nesting birds and raptors will be implemented, including compliance with the Federal Migratory Bird Treaty Act and California Fish and Game Code Sections of the 3500 series.

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



Ryan Quilley
Staff Biologist

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ATTACHMENT A

Figures





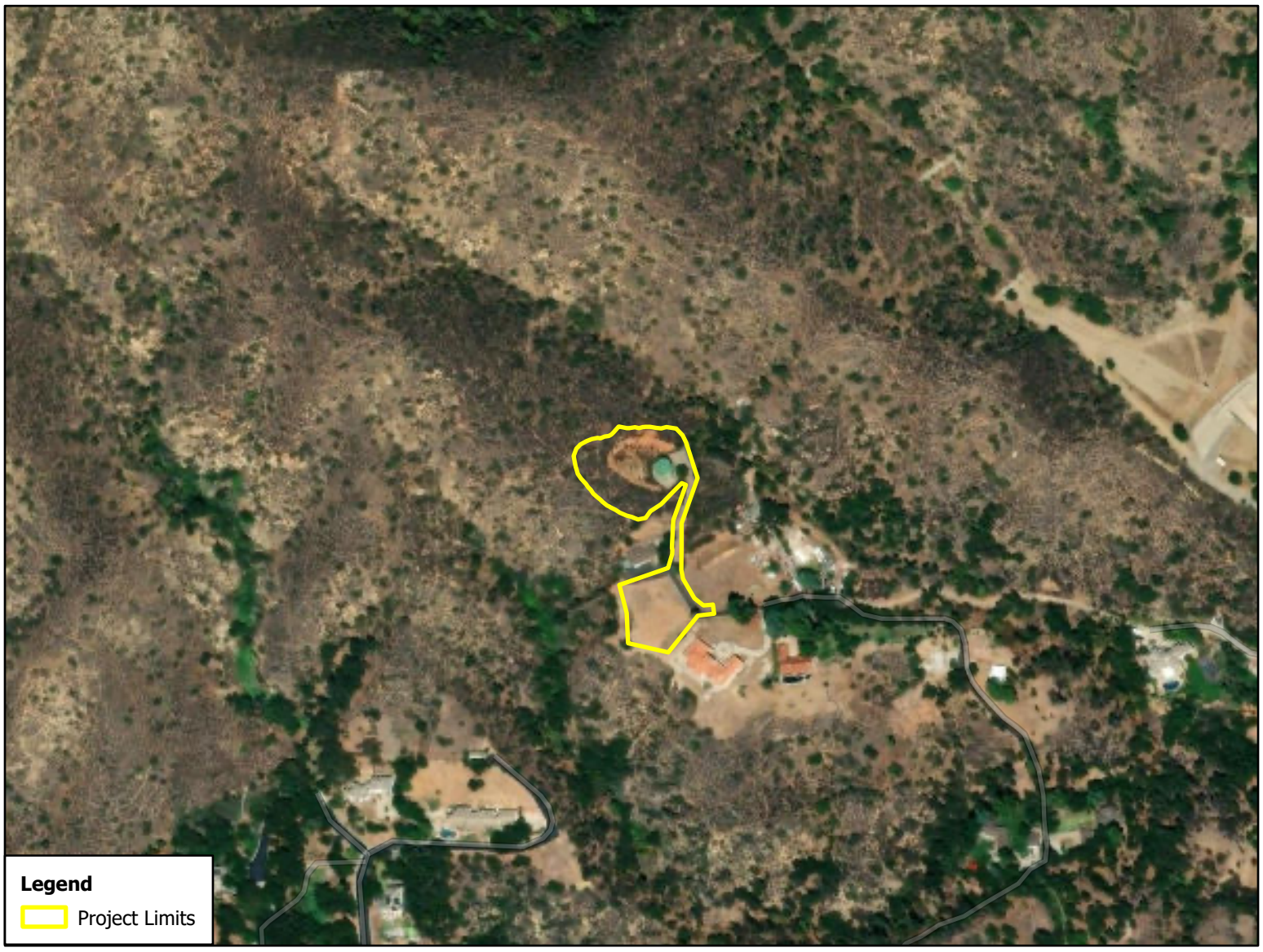

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Figure 1

Project Vicinity and Location

North Glendora Water Tank

Blackhawk Environmental

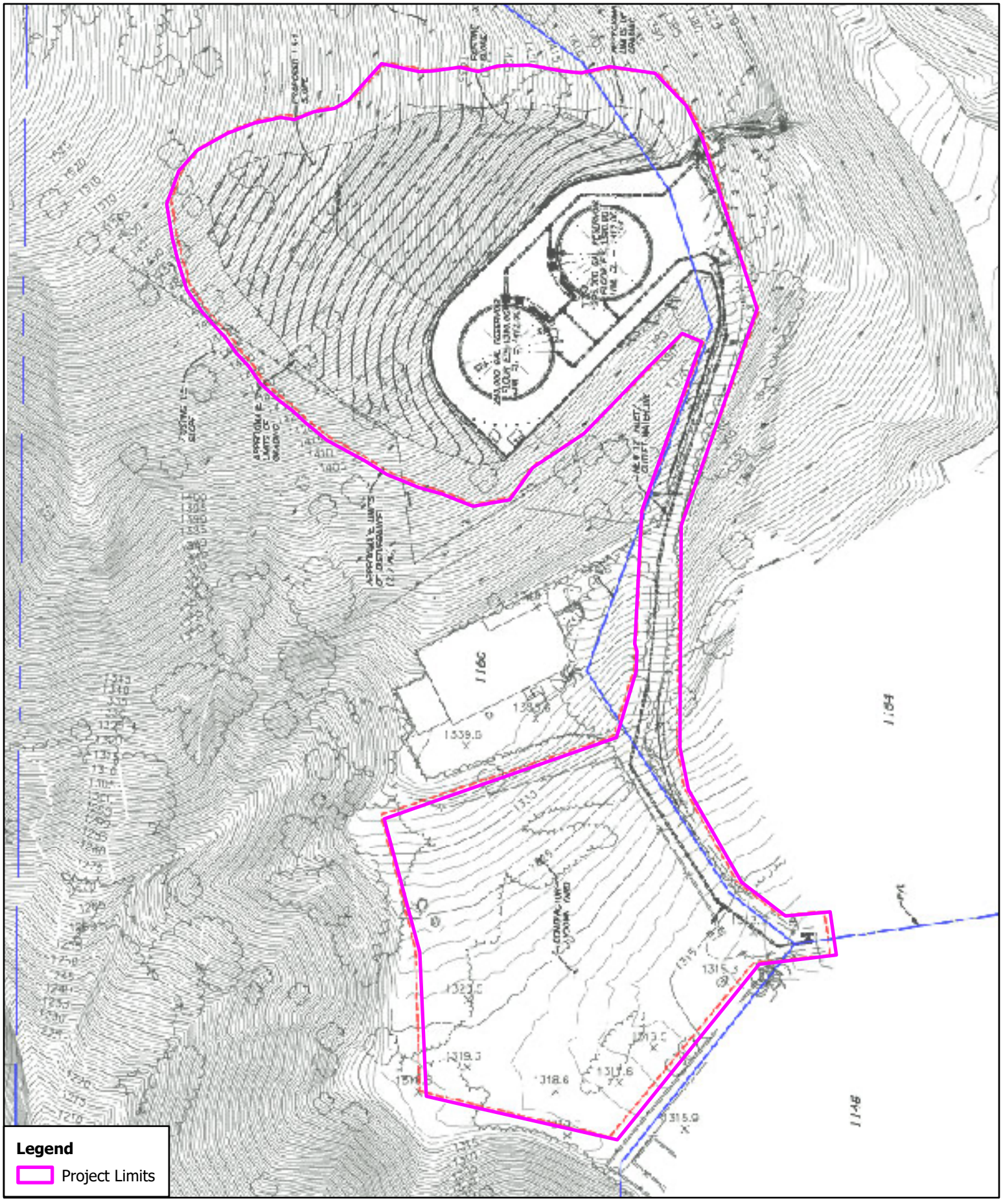


Figure 2

Project Design Overlay

North Glendora Water Tank

Blackhawk Environmental

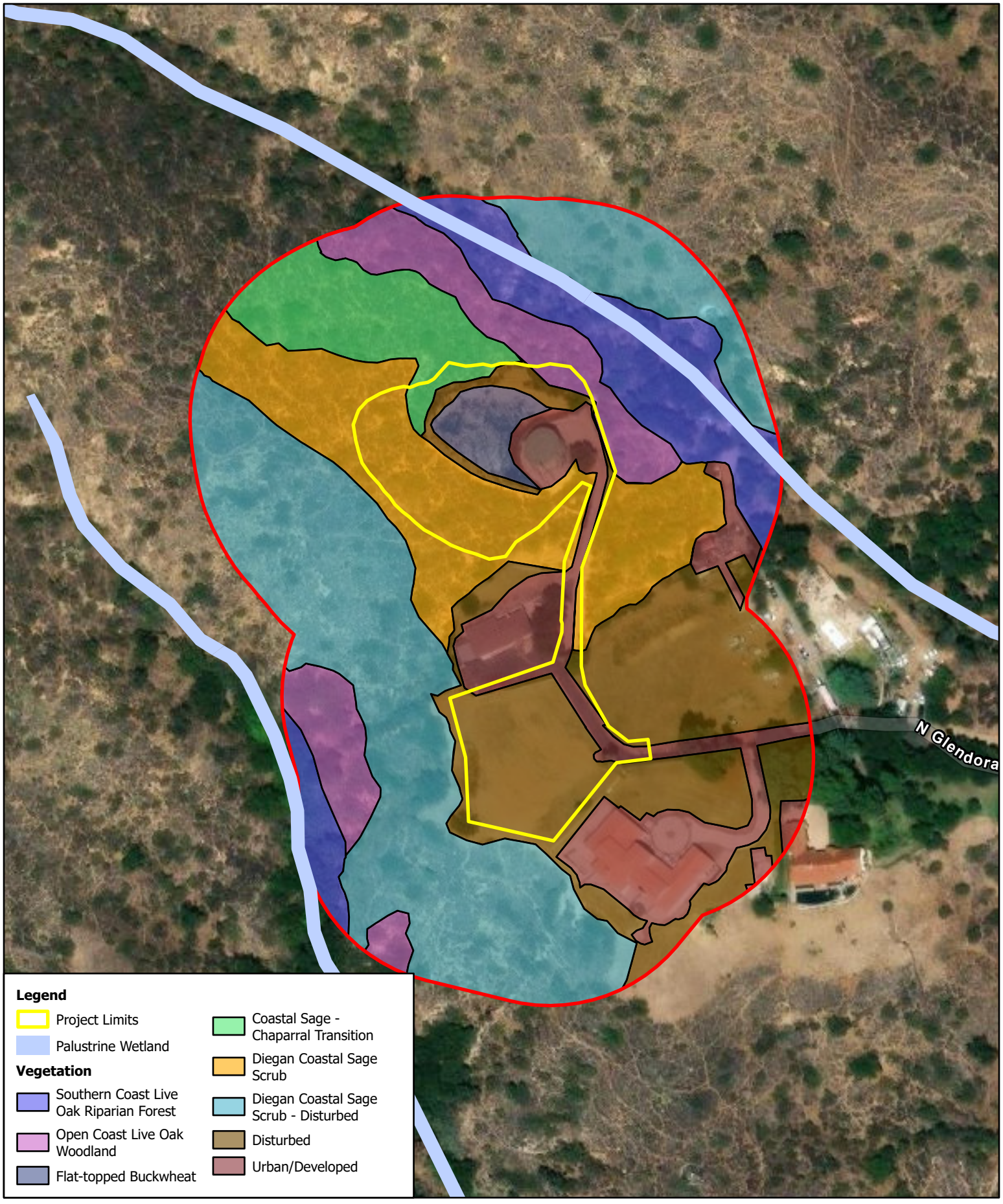


Figure 3

Vegetation Communities

North Glendora Water Tank

Blackhawk Environmental

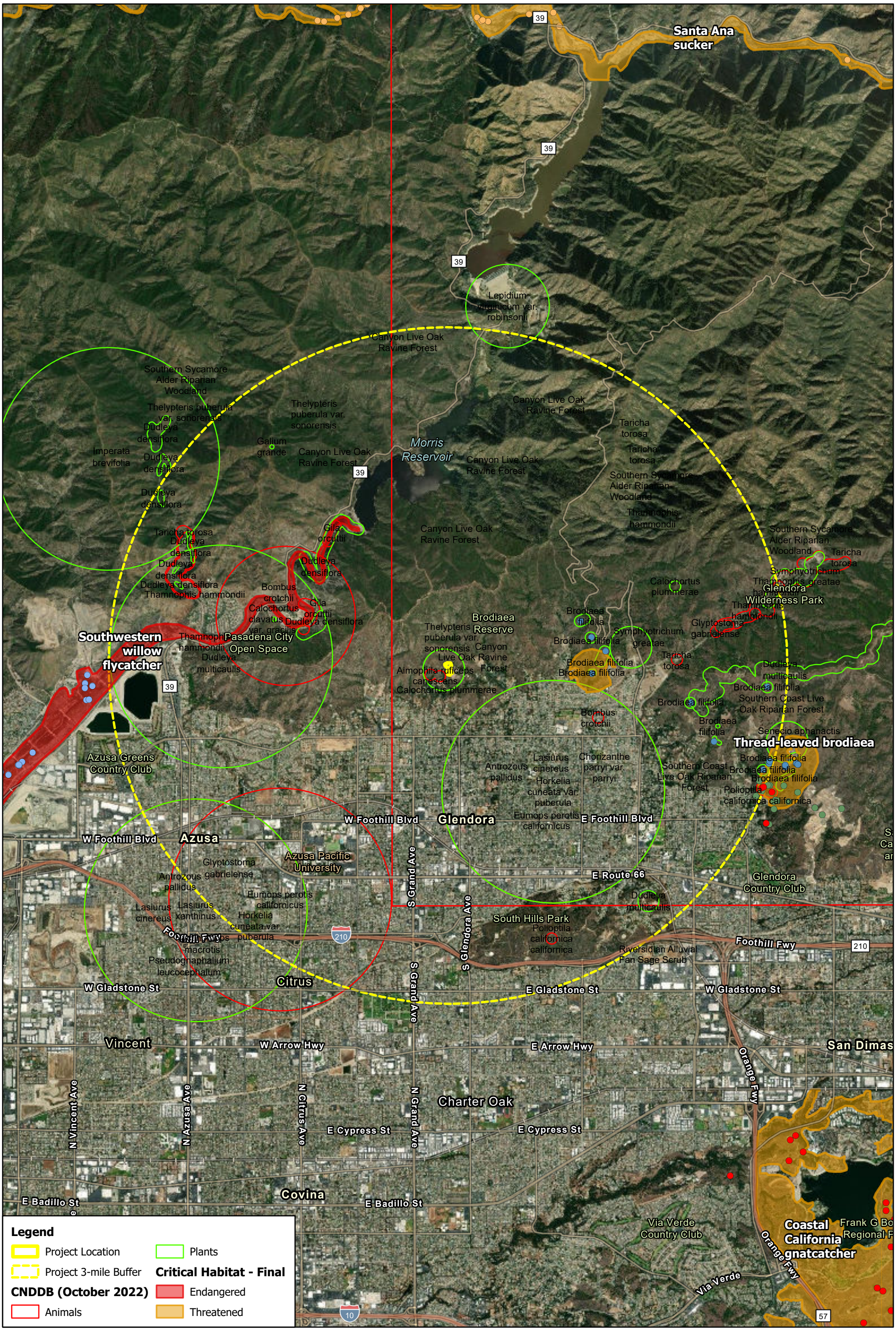
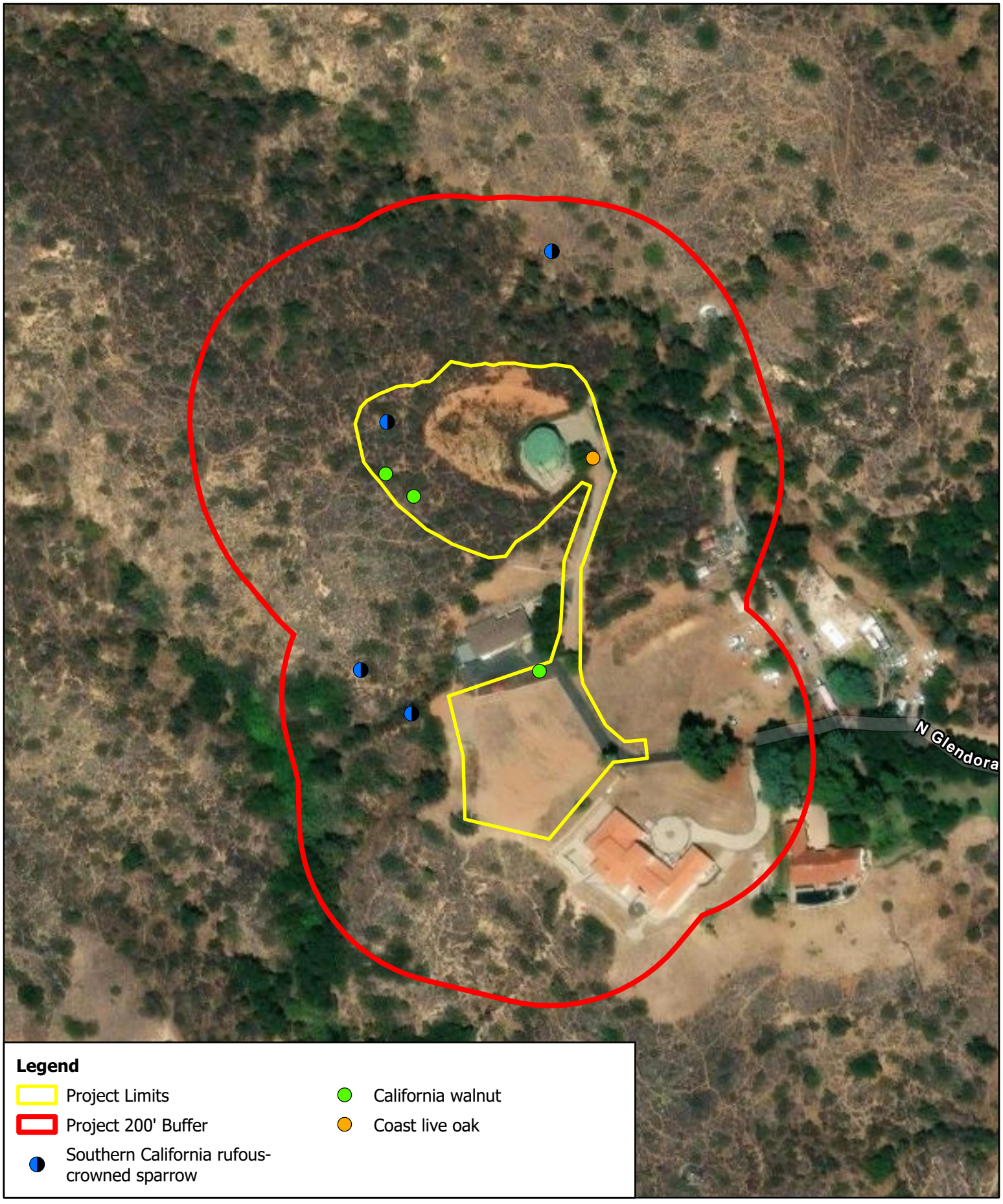


Figure 4
Historical Species Occurrences

North Glendora Water Tank

Blackhawk Environmental



Blackhawk Environmental

Figure 5

Observed Sensitive Species and Native Trees

North Glendora Water Tank

ATTACHMENT B

Representative Photographs

Blackhawk Environmental



Photograph 1. Southeast-facing view of Southern Coast Live Oak Riparian Forest occurring 80 feet to the northeast of the eastern project boundary (within Survey Area only). Disturbed Diegan Coastal Sage Scrub with high nonnative species cover is visible in the foreground.



Photograph 2. East-facing view of Southern Coast Live Oak Riparian Forest with non-native grass dominating portions of the understory (within Survey Area only).



Photograph 3. Northwest-facing view of Southern Coast Live Oak Riparian Forest occurring 80 feet to the northeast of the eastern project boundary (within Survey Area only).



Photograph 4. West-southwest-facing view of Open Coast Live Oak Woodland, recovering from fire damage, abutting the eastern edge of the Project Area. The existing water tank and associated cut slope from original installation is visible in the background.



Photograph 5. Fire-damaged Southern California black walnut occurring within the western portion of Project Area.



Photograph 6. West-facing view of degraded Diegan Coastal Sage Scrub with scattered regrowth of coast live oak trees, heavily damaged from the Colby Fire. Steep slopes leading to the top of the ridgeline are visible in the background.



Photograph 7. Northwest-facing view of Diegan Coastal Sage Scrub habitat occurring in the Survey Area with Coastal Sage Chaparral Scrub in the background containing a higher density of Chamise (*Adenostoma fasciculata*) and other chaparral species.



Photograph 8. Newly proposed construction laydown area consisting of 100% disturbed habitat that is periodically mowed and dominated by non-native weedy species such as shortpod mustard (*Hirschfeldia incana*).



Photograph 9. Newly proposed construction laydown area consisting of 100% disturbed habitat that is periodically mowed and dominated by non-native weedy species such as shortpod mustard (*Hirschfeldia incana*).



Photograph 10. South-facing view of Diegan Coastal Sage Scrub occurring to the north of the Project Area. Portions of this habitat had higher abundance of nonnative species such as shortpod mustard (*Hirschfeldia incana*), visible in the middle of the frame. The existing water tank is visible in the background.



Photograph 11. East-facing view of Diegan Coastal Sage Scrub habitat occurring within the Project Area that will be impacted by Project activities.



Photograph 12. Southwest-facing view of Disturbed DCSS that occurs to the west of the Project Area that has high nonnative species cover. This habitat also contains scattered, small, Southern California black walnut (far left).



Photograph 13. South-facing view of Disturbed DCSS transitioning to DCSS along the edge of the western Project boundary. A large rural residence is visible in the background, with associated Urban/Developed and Disturbed habitat.



Photograph 14. South-southwest-facing view of a steep canyon supporting riparian vegetation to the west of the Survey Buffer.



Photograph 15. Southeast-facing view of the existing water tank facility and steep, previously graded cut-slope (foreground) composed of Flat-topped buckwheat scrub habitat with patches of bare ground.



Photograph 16. Northeast-facing view of the paved road leading uphill to the existing water tower composed of DCSS. One large coast live oak tree, occurring within the Project Area, is visible in the background.



Photograph 17. Southwest-facing view of residence occurring immediately to the southwest of the paved road that enters the Project Area. Several mature coast live oak trees and one mature California sycamore are associated with this property.



Photograph 18. Southeast-facing view of DCSS immediately adjacent to the southeast edge of the Project Area (within Survey Buffer only).



Photograph 19. West-facing view of Flat-topped Buckwheat Scrub growing within the historically graded cut-slope. Old fiber rolls (BMPs) are visible along the slope contours and the existing water tank on the left.



Photograph 20. South-facing view of the paved road leading to the existing water tower. DCSS habitat is visible on the left and the only mature coast live oak within the Project Area is visible on the right.

ATTACHMENT C

Observed Plant Species

Blackhawk Environmental

Plant Species Observed within the North Glendora Water Tank Project Area

Scientific Name	Common Name
GYMNOSPERMS	
CYCADACEAE	**Cycad Family**
*Cycas revoluta	sago palm
PINACEAE	**Pine Family**
**Pinus sp.*	ornamental pine
EUDICOTS	
ANACARDIACEAE	**Sumac Family**
Malosma laurina	laurel sumac
Rhus integrifolia	lemonade berry
Toxicodendron diversilobum	Pacific poison oak
ARALIACEAE	**Ginseng Family**
***Hedera helix*	English Ivy
ASTERACEAE	**Aster - Daisy - Composite Family**
Acourtia microcephala	sacapellote
Artemisia californica	California sagebrush
Baccharis salicifolia	mule fat
**Bidens pilosa*	hairy beggarticks
Brickellia californica	California brickellbush
***Carduus pycnocephalus*	Italian thistle
***Centaurea melitensis*	tocalote
Cirsium occidentale	western thistle
Crocanthemum scoparium	peak rushrose
**Dimorphotheca sinuata*	African daisy
Encelia farinosa	brittlebush
Erigeron canadensis	horseweed
Eriophyllum confertiflorum	yellow yarrow
Gutierrezia californica	matchweed
Hazardia squarrosa	saw toothed golendbush
Helianthus annuus	hairy leaved sunflower
Helianthus gracilentus	slender sunflower
Heterotheca grandiflora	telegraph weed
***Hypochaeris glabra*	smooth cat's ear
**Lactuca serriola*	prickly lettuce
Logfia filaginoides	California cottonrose
Pseudognaphalium biolettii	two-color rabbit-tobacco
Pseudognaphalium californicum	California everlasting
Pseudognaphalium microcephalum	Wright's cudweed
**Sonchus oleraceus*	sow thistle
Stephanomeria cichoriacea	chicory leaved stephanomeria

Scientific Name	Common Name
BORAGINACEAE	**Borage Family**
Cryptantha sp.	cryptantha
BRASSICACEAE	**Mustard Family**
***Hirschfeldia incana*	short-pod mustard
***Sisymbrium irio*	London rocket
CACTACEAE	**Cactus Family**
**Opuntia ficus-indica*	mission prickly-pear
Opuntia littoralis	coast prickly pear
CAPRIFOLIACEAE	**Honeysuckle Family**
Lonicera subspicata	southern honeysuckle
CARYOPHYLLACEAE	**Pink Family**
**Silene gallica*	common catchfly
CHENOPODIACEAE	**Goosefoot Family**
***Salsola tragus*	Russian thistle
CONVOLVULACEAE	**Morning-Glory Family**
Calystegia macrostegia	island morning-glory
Cuscuta californica	California dodder
CRASSULACEAE	**Stonecrop Family**
Crassula connata	pygmyweed
CUCURBITACEAE	**Gourd Family**
Marah macrocarpa	wild cucumber
EUPHORBIACEAE	**Spurge Family**
Croton setiger	turkey-mullein
**Euphorbia maculata*	spotted spurge
***Ricinus communis*	castor bean
FABACEAE	**Pea Family**
***Acacia* sp.	acacia
Acmispon glaber	deerweed
Lupinus hirutissimus	stinging annual lupine
***Medicago polymorpha*	bur clover
FAGACEAE	**Oak Family**
Quercus agrifolia	coast live oak
GERANIACEAE	**Geranium Family**
***Erodium cicutarium*	coastal heron's bill
HYDROPHYLLACEAE	**Waterleaf Family**
Phacelia distans	wild heliotrope
JUGLANDACEAE	**Walnut Family**
†*Juglans californica*⁺ (CNPS 4.2)	Southern California black walnut
LAMIACEAE	**Mint Family**
***Marrubium vulgare*	horehound

Scientific Name	Common Name
Salvia apiana	white sage
Salvia mellifera	black sage
MALVACEAE	**Mallow Family**
**Malva parviflora*	cheeseweed mallow
MORACEAE	**Mulberry Family**
***Ficus carica*	common fig
MYRSINACEAE	**Myrsine Family**
**Lysimachia arvensis*	scarlet pimpernel
MYRTACEAE	**Myrtle Family**
**Acca sellowiana*	pineapple guava
**Callistemon citrinus*	crimson bottlebrush
NYCTAGINACEAE	**Four O' Clock Family**
**Bougainvillea glabra*	paper flower
Mirabilis laevis var. *crassifolia*	coastal wishbone plant
ONAGRACEAE	**Evening-primrose Family**
Epilobium canum	California fuchsia
Oenothera laciniata	cutleaf evening primrose
PAPAVERACEAE	**Poppy Family**
Eschscholzia californica	California poppy
PHRYMACEAE	**Lopseed Family**
Diplacus aurantiacus	sticky monkeyflower
PHYTOLACCACEAE	**Pokeweed Family**
***Phytolacca americana*	pokeweed
PLANTAGINACEAE	**Plantain Family**
Antirrhinum kelloggii	lax snapdragon
Keckiella cordifolia	heart leaved keckiella
PLATANACEAE	**Plane-tree Family**
Platanus racemosa	western sycamore
POLYGONACEAE	**Buckwheat Family**
Eriogonum fasciculatum var. foliolosum	California buckwheat
Eriogonum elongatum	longstem buckwheat
RHAMNACEAE	**Buckthorn Family**
Rhamnus crocea	spiny redberry
Rhamnus ilicifolia	holly-leaf redberry
ROSACEAE	**Rose Family**
Adenostoma fasciculatum	chamise
Heteromeles arbutifolia	toyon
RUBIACEAE	**Coffee Family**
Galium angustifolium	narrow-leaved bedstraw
SOLANACEAE	**Nightshade Family**

Scientific Name	Common Name
***Nicotiana glauca*	tree tobacco
Solanum xanti	chaparral nightshade
**Solanum nigrum*	black nightshade
MONOCOTS	
AGAVACEAE	**Agave Family**
Hesperoyucca whipplei	chaparral yucca
ARECACEAE	**Palm Family**
***Washingtonia robusta*	Mexican fan palm
ASPHODELACEAE	**Aloe Family**
**Aloe maculata*	soap aloe
LILIACEAE	**Lily Family**
Calochortus clavatus var. *clavatus*	club haired mariposa lily
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POACEAE	**Grass Family**
***Avena fatua*	wild oat
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***Schismus barbatus*	old han schismus
***Stipa miliacea*	smilo grass
THEMIDACEAE	**Brodiaea Family**
Dipterostemon capitatus	blue dicks

Key to symbols: * Non-native, ** Non-native and invasive according to Cal-IPC, † special-status species, CNPS Rare Plant Rank, City of Glendora special status species

ATTACHMENT D

Observed Wildlife Species List

Blackhawk Environmental

AVES	BIRDS
ACCIPITRIDAE	**Hawks & Eagles**
Buteo jamaicensis	red-tailed hawk
AEGITHALIDAE	**Long-tailed Tits**
Psaltriparus minimus	bushtit
CARDINALIDAE	**Cardinals & allies**
Passerina amoena	lazuli bunting
CATHARTIDAE	**New World Vultures**
Cathartes aura	turkey vulture
COLUMBIDAE	**Pigeons & Doves**
Zenaida macroura	mourning dove
CORVIDAE	**Crows & Jays**
Corvus corax	common raven
Aphelocoma californica	California scrub jay
EMBERIZIDAE	**Sparrows & allies**
Aimophila ruficeps canescens	Southern California rufous-crowned sparrow
Melozone crissalis	California towhee
FRINGILLIDAE	**Finches & allies**
Haemorhous mexicanus	house finch
Spinus psaltria	lesser goldfinch
ICTERIDAE	**New World Blackbirds, Orioles & allies**
Icterus cucullatus	hooded oriole
MIMIDAE	**Mockingbirds & Thrashers**
Mimus polyglottos	northern mockingbird
Toxostoma redivivum	California thrasher
PARIDAE	**Tits**
Baeolophus inornatus	oak titmouse
PICIDAE	**Woodpeckers & allies**
Picoides nuttallii	Nuttall's woodpecker
PTILOGONATIDAE	**Silky Flycatcher**
Phainopepla nitens	phainopepla
SYLVIIDAE	**True Warblers & Parrotbills**
Chamaea fasciata	wrentit
TROCHILIDAE	**Hummingbirds**
Calypte anna	Anna's hummingbird
Selasphorus sasin	Allen's hummingbird
TROGLODYTIDAE	**Wrens**
Thryomanes bewickii	Bewick's wren
Troglodytes aedon	house wren
TYRANNIDAE	**Tyrant Flycatchers**
Empidonax difficilis	Pacific-slope flycatcher
Myiarchus cinerascens	ash-throated flycatcher
Sayornis nigricans	black phoebe
MAMMALIA	**MAMMALS**
CANIDAE	**Foxes, Wolves & Allies**
**Canis latrans*	domestic dog
CERVIDAE	**True Deer**
Odocoileus hemionus fuliginatus	Southern mule deer
GEOMYIDAE	**Gophers**
Thomomys bottae	Botta's pocket gopher

** Non-native species*

ATTACHMENT E

Focused Rare Plant Survey Report 2023



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June 16, 2023

Focused Rare Plant Survey Report

North Glendora Water Tank Project

City of Glendora, Los Angeles County, CA

Blackhawk Environmental, Inc. (Blackhawk) was contracted by EPD Solutions, Inc. to conduct several biological resources surveys in support of the proposed North Glendora Water Tank Project (Project) located in the City of Glendora in Los Angeles County, California (Attachment A, Figure 1). The Project covers a total of 2.02 acres. This report includes literature review results for special-status plant species occurrences within the vicinity of the Project site and focused rare plant survey methods and results from spring of 2023, as well as incidental sightings that were recorded during previous site visits. No special-status plant species were observed on the Project site at the time of the focused rare plant survey or during previous site visits.

METHODS

A literature review for known occurrences of special-status ("rare") plant species was conducted within three miles of the Project site via searches of the California Natural Diversity Database (CNDDB) and United States Fish & Wildlife Service (USFWS) Critical Habitat designations as part of the North Glendora Water Tank Project Biological Letter Report (BLR). Plant species were considered special-status species if they met one or more of the following criteria:

- Plant species listed as endangered (FE), threatened (FT), or candidates (FPE or FPT) for listing under the Federal Endangered Species Act (FESA);
- Plant species listed as endangered (SE), threatened (ST), or candidates (SPE or SPT) for listing under the California Endangered Species Act (CESA);
- Plants that are state listed as Rare[1]; or
- Plant species ranked by the California Native Plant Society (CNPS) as having a California Rare Plant Rank (CRPR) of 1 or 2.[2]

Following the literature review, a preliminary potential for occurrence (PFO) was assigned to each species as cross-reference by existing conditions on the Project site and hypothesized suitability. The BLR determined potential for occurrence of seven rare plant species within the Project site and a focused rare plant survey was conducted to determine if these species occur within the Project. Although the BLR identified that six of the 13 targeted rare plant species were considered absent within the Project site, it is important to note that the nature of this survey included cataloging all plant species

observed within the Project site, including those presumed to be absent and possibly other rare species that may not yet be known within three miles of the Project site. The survey was conducted on June 1, 2023, by a team of two Blackhawk biologists (Ryan Quilley and Dustin Janeke) walking in slightly meandering transects approximately 20 to 60 feet apart from one another along the entire 2.02-acre Project impact areas and the associated 50-foot survey buffer in order to achieve 100% visual coverage (Attachment A, Figure 1). In general, the distance between transects increased or decreased as necessary in order to ensure full coverage and varied with factors such as habitat type, topography, vegetative density and height, access restrictions and target species morphological traits. Since some of the target species could be identified from non-floral characteristics outside of bloom periods, and many other special-status plant species known in the region have generally overlapping bloom periods, a single survey pass along the Project site was deemed sufficient to capture any potentially occurring sensitive plant species for this Project. Plant species observed during the rare plant survey were combined with incidental plant species observations recorded during visits for other general biological surveys, and a comprehensive plant species list was prepared (Attachment B).

Each surveyor recorded all plant species encountered during the survey (Attachment B). In order to make specific or sub-specific determinations, digital photographs and/or small samples were collected for some species that required further analysis. The botanists worked collaboratively as a team to ensure that all observed plants were documented correctly for proper presentation in the findings of this report.

Botanical taxonomy follows *The Jepson Manual: Vascular Plants of California, second edition* and the *Jepson eFlora*. Invasive plants were identified utilizing California Invasive Plant Council's (Cal-IPC) Inventory Database (http://www.cal-ipc.org/paf/).

RESULTS

The literature review resulted in a total of 13 special-status plant species that were reported to historically or presently occur within three miles of the Project:

- **California satintail** (*Imperata brevifolia*)
- **Chaparral ragwort** (*Senecio aphanactis*)
- **Greata's aster** (*Symphyotrichum greatae*)
- **Many-stemmed dudleya** (*Dudleya multicaulis*)
- **Mesa horkelia** (*Horkelia cuneata var. puberula*)
- **Parry's spineflower** (*Chorizanthe parryi* var. *parryi*)
- **San Gabriel Bedstraw** (*Galium grande*)
- **San Gabriel Mountains dudleya** (*Dudleya densiflora*)
- **Slender horned spineflower** (*Dodecahema leptoceras*)
- **Slender mariposa lily** (*Calochortus clavatus* var. *gracilis*)
- **Sonoran maiden fern** (*Thelypteris puberula* var. *sonorensis*)
- **Thread-leaved brodiaea** (*Brodiaea filifolia*)
- **White rabbit-tobacco** (*Pseudognaphalium leucocephalum*)

Prior to conducting the focused rare plant survey, and in order to accurately gauge PFOs for all 13 of these plant species, several variables were weighed, including the numbers of, distances to, dates and qualities of the reported occurrences, habitat and/or elevation restrictions, onsite soil types, connectivity to source populations and seed dispersal mechanisms of the target species, regional rarity and firsthand experience. None of the 13 rare plant species were known to be present directly within the Project site prior to the focused rare plant survey; likewise, none were found to have a high PFO. Six species were considered absent from the Project site, primarily due to a lack of suitable habitat. Of the remaining seven plant species, five had a low PFO associated with their potential presence within the Project site and two had a moderate PFO associated with their potential presence within the Project site.

- **Moderate PFO:** Slender mariposa lily and thread-leaved brodiaea.
- **Low PFO**: Graeta's aster, many-stemmed dudleya, Parry's spineflower, San Gabriel bedstraw, and white rabbit tobacco.
- **Absent PFO**: California satintail, chaparral ragwort, mesa horkelia, San Gabriel Mountains dudleya, slender horned spineflower, and Sonoran maiden fern.

The focused rare plant survey confirmed that no rare plant species currently occur within the Project site or associated 50-foot survey buffer. Therefore, **all rare plant species evaluated within the BLR are considered absent** from the Project site. Special-status plant species and their revised PFO are summarized in Table 1 below.

During the rare plant survey, the biologists observed several *Calochortus* individuals that were not yet in bloom. By using the plant identification keys found within *The Jepson Manual: Vascular Plants of California, second edition*, the biologists were able to determine that these individuals were not the special-status slender mariposa lily (*Calochortus clavatus* var. *gracilis*) but were instead either club haired mariposa lily (*Calochortus clavatus* var. *clavatus*) or Weed's mariposa lily (*Calochortus weedii*). This determination was made based off morphological features such as stem height and shape.

A total of 103 plant species belonging to 43 families were documented within the Project site; 45 were non-native (including landscape species) and/or invasive (Attachment B). Two native tree species occur within the Project Area or immediate vicinity: Southern California black walnut (*Juglans californica*) and mature coast live oak (*Quercus agrifolia*) (Attachment A, Figure 1). No special-status plant species were documented.

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CONCLUSION

No special-status plant species were observed on the Project site. Therefore, no impacts to special-status plant species are anticipated to occur as a result of this Project.

If you have any questions regarding this report, please feel free to call me at 610-804-8916 or e-mail me at ryanq@blackhawkenv.com.

Sincerely,



Ryan Quilley
Senior Biologist

ATTACHMENTS

A Figure
B Observed Plant Species List

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United States Geological Survey (USGS)
2023 7.5-minute topographic quadrangle map for *Glendora*, California.

ATTACHMENT A

Figures

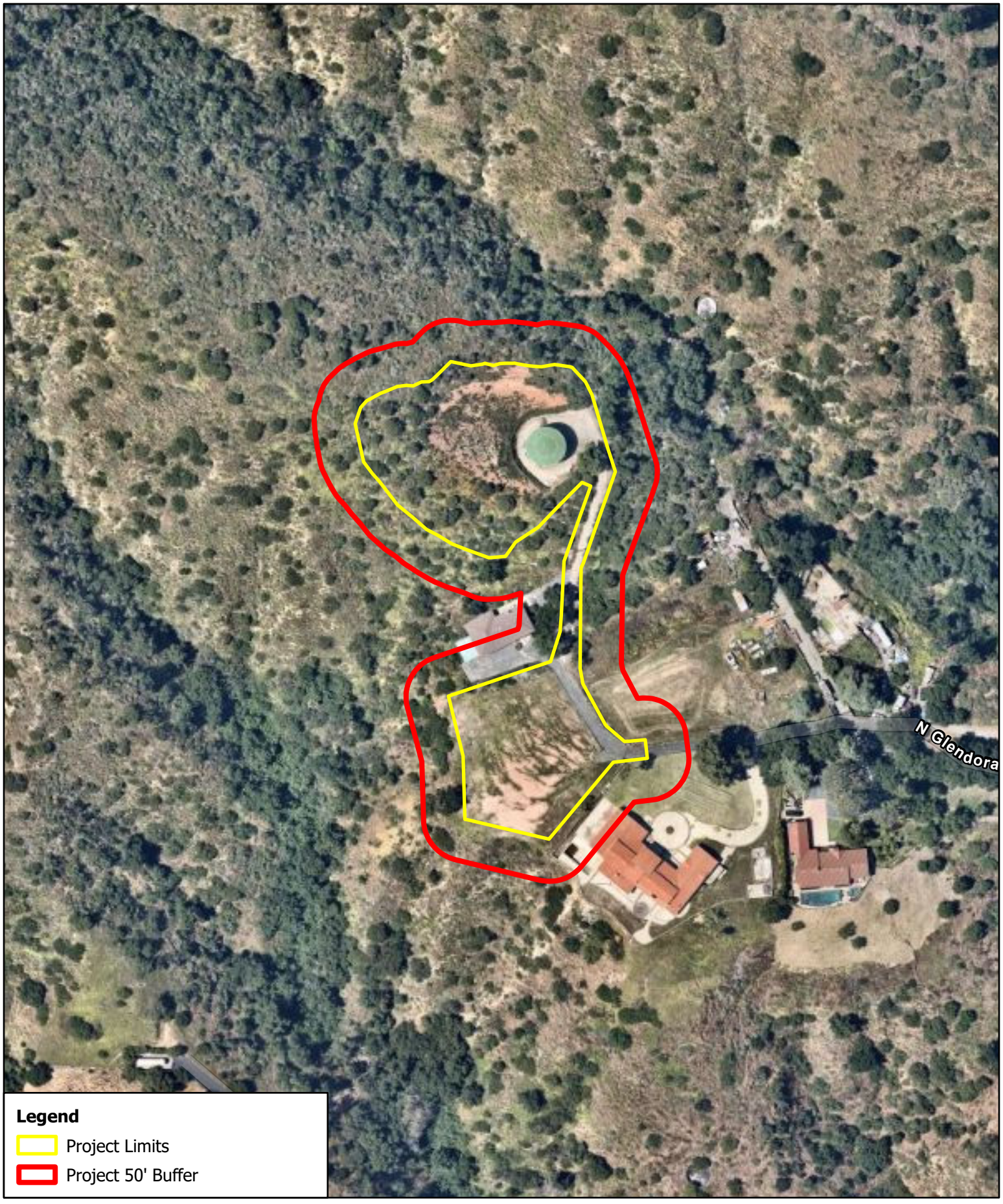

Figure 1

Rare Plant Survey 2023

North Glendora Water Tank

Blackhawk Environmental

ATTACHMENT B

Observed Plant Species List

Blackhawk Environmental

Plant Species Observed within the North Glendora Water Tank Project Area

Scientific Name	Common Name
GYMNOSPERMS	
CYCADACEAE	**Cycad Family**
*Cycas revoluta	sago palm
PINACEAE	**Pine Family**
**Pinus sp.*	ornamental pine
EUDICOTS	
ANACARDIACEAE	**Sumac Family**
Malosma laurina	laurel sumac
Rhus integrifolia	lemonade berry
Toxicodendron diversilobum	Pacific poison oak
ARALIACEAE	**Ginseng Family**
***Hedera helix*	English Ivy
ASTERACEAE	**Aster - Daisy - Composite Family**
Acourtia microcephala	sacapellote
Artemisia californica	California sagebrush
Baccharis salicifolia	mule fat
**Bidens pilosa*	hairy beggarticks
Brickellia californica	California brickellbush
***Carduus pycnocephalus*	Italian thistle
***Centaurea melitensis*	tocalote
Cirsium occidentale	western thistle
Crocanthemum scoparium	peak rushrose
**Dimorphotheca sinuata*	African daisy
Encelia farinosa	brittlebush
Erigeron canadensis	horseweed
Eriophyllum confertiflorum	yellow yarrow
Gutierrezia californica	matchweed
Hazardia squarrosa	saw toothed golendbush
Helianthus annuus	hairy leaved sunflower
Helianthus gracilentus	slender sunflower
Heterotheca grandiflora	telegraph weed
***Hypochaeris glabra*	smooth cat's ear
**Lactuca serriola*	prickly lettuce
Logfia filaginoides	California cottonrose
Pseudognaphalium biolettii	two-color rabbit-tobacco
Pseudognaphalium californicum	California everlasting
Pseudognaphalium microcephalum	Wright's cudweed
**Sonchus oleraceus*	sow thistle
Stephanomeria cichoriacea	chicory leaved stephanomeria

Scientific Name	Common Name
BORAGINACEAE	**Borage Family**
Cryptantha sp.	cryptantha
BRASSICACEAE	**Mustard Family**
***Hirschfeldia incana*	short-pod mustard
***Sisymbrium irio*	London rocket
CACTACEAE	**Cactus Family**
**Opuntia ficus-indica*	mission prickly-pear
Opuntia littoralis	coast prickly pear
CAPRIFOLIACEAE	**Honeysuckle Family**
Lonicera subspicata	southern honeysuckle
CARYOPHYLLACEAE	**Pink Family**
**Silene gallica*	common catchfly
CHENOPODIACEAE	**Goosefoot Family**
***Salsola tragus*	Russian thistle
CONVOLVULACEAE	**Morning-Glory Family**
Calystegia macrostegia	island morning-glory
Cuscuta californica	California dodder
CRASSULACEAE	**Stonecrop Family**
Crassula connata	pygmyweed
CUCURBITACEAE	**Gourd Family**
Marah macrocarpa	wild cucumber
EUPHORBIACEAE	**Spurge Family**
Croton setiger	turkey-mullein
**Euphorbia maculata*	spotted spurge
***Ricinus communis*	castor bean
FABACEAE	**Pea Family**
***Acacia* sp.	acacia
Acmispon glaber	deerweed
Lupinus hirutissimus	stinging annual lupine
***Medicago polymorpha*	bur clover
FAGACEAE	**Oak Family**
Quercus agrifolia	coast live oak
GERANIACEAE	**Geranium Family**
***Erodium cicutarium*	coastal heron's bill
HYDROPHYLLACEAE	**Waterleaf Family**
Phacelia distans	wild heliotrope
JUGLANDACEAE	**Walnut Family**
†*Juglans californica*⁺ (CNPS 4.2)	Southern California black walnut
LAMIACEAE	**Mint Family**
***Marrubium vulgare*	horehound

Scientific Name	Common Name
Salvia apiana	white sage
Salvia mellifera	black sage
MALVACEAE	**Mallow Family**
**Malva parviflora*	cheeseweed mallow
MORACEAE	**Mulberry Family**
***Ficus carica*	common fig
MYRSINACEAE	**Myrsine Family**
**Lysimachia arvensis*	scarlet pimpernel
MYRTACEAE	**Myrtle Family**
**Acca sellowiana*	pineapple guava
**Callistemon citrinus*	crimson bottlebrush
NYCTAGINACEAE	**Four O' Clock Family**
**Bougainvillea glabra*	paper flower
Mirabilis laevis var. *crassifolia*	coastal wishbone plant
ONAGRACEAE	**Evening-primrose Family**
Epilobium canum	California fuchsia
Oenothera laciniata	cutleaf evening primrose
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