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EPD Solutions
Attn: Tanya Kalaskar
3333 Michelson Drive Suite 500
Irvine, CA 92612

General Biological Assessment Report
2411 Glassell Street Project
Orange, Orange County, CA

Dear Ms. Kalaskar:

Blackhawk Environmental, Inc. (Blackhawk) was contracted by EPD Solutions to perform a literature review, biological resources field survey, and produce a general biological assessment report in support of the proposed 2411 Glassell Street Project (Project) located in Orange, California (Figure 1). The Project is located within two industrially developed parcels at 2411 Glassell Street in the city of Orange, California; Assessor Parcel Numbers (APNs): 374-381-01 and 374-381-02. The Project site is approximately 12.1 acres. This report details the methods utilized for the literature review and survey, survey results, anticipated Project impacts, discussion, and recommended Project design features to minimize or eliminate impacts to threatened and endangered species, migratory birds and/or other biological and/or aquatic resources resulting from the Project.

1.0 PROJECT LOCATION

The Project site is located at 2411 Glassell Street in the city of Orange, Orange County, California within Township 4 South, Range 9 West, San Bernardino Principal Meridian. The Project site is depicted within the U.S. Geological Survey (USGS) *Orange, California* 7.5-minute topographic quadrangle (USGS 2011; Attachment A, Figure 1). The Project is bound to the north by East Fletcher Avenue and bound to the west by North Glassell Street. Active railroad tracks and North Orange Olive Road occur to the east, while abandoned railroad tracks and additional development occur to the south (Figure 1). The State Route (SR)-91 and SR-55 interchange occurs approximately 1.62 miles northeast of the Project. The Survey Area included the Project site plus a 100-foot boundary, which totaled 19.8 acres. The Project site is currently developed with three 2-story industrial buildings totaling 191,127 square feet (sf), 597 parking spaces, and landscaping within and surrounding the site.

2.0 PROJECT DESCRIPTION

The proposed Project plans include the demolition of the existing buildings and development of a 299,988-square foot (sf) warehouse building, inclusive of 18,800 sf of office space, 109,000 sf of manufacturing space and 171,188 sf of warehouse space. In addition, the proposed Project would provide 380 total parking spaces and 65,137 sf of landscaping with seven different types of trees and a variety of shrub species.

3.0 METHODS

Evaluation of the Project site consisted of conducting a literature review and a field survey to document existing conditions and identify special-status native vegetation communities, wildlife, and/or plant species occurring on and adjacent to the Project site. Methods described below focused on determination of potential for occurrence of special-status plant and wildlife species. Species are 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 (FC) for listing under the Federal Endangered Species Act (FESA);
- Plant and animal species listed as endangered (SE), threatened (ST), or candidates (SC) 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 Rare¹; or
- Plant species ranked by the California Native Plant Society (CNPS) as having a California Rare Plant Rank (CRPR) of 1 or 2²;

3.1 Literature Review

Blackhawk Environmental Biologist Hayley Milner conducted a database records search (January 17, 2025) of the Project site. The database records search included the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2025; Attachment A, Figure 2); United States Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI; USFWS 2025c) and the USGS 3D Hydrography Program (3DHP; USGS 2025) (Attachment A, Figure 3); CDFW California Natural Diversity Database (CNDDDB) (CDFW 2025; Attachment A, Figure 4); the USFWS Information for Planning and Consultation (IPaC; USFWS 2025a) and Critical Habitat Portal (USFWS 2025b; Attachment A, Figure 5); and the California Native Plant Society's (CNPS) Rare Plant Inventory (CNPS 2025). A 1-mile radius surrounding the Project site was reviewed for all database records, except the CNPS Rare Plant Inventory where the query focused on the topographic quadrangle in which the Project site is located.

These databases and literature reviews were used to provide details on special-status species or habitat types that have potential to occur within the proposed Project site and/or its surrounding area for the habitat assessment and/or any follow-up focused survey efforts.

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

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."

3.2 Habitat

Utilizing the background data described above, Blackhawk Environmental Biologists Sarah Toback and Pablo Corcoran conducted a field survey of the Project site on January 23, 2025 to assess the Project site for its existing conditions, and for its capacity to potentially harbor special-status biological resources and/or habitats identified in the literature review. Fine-scale vegetation mapping was completed by Ms. Toback during the survey within the Survey Area.

Methods used during the field survey included slowly walking accessible portions of the Project site and Survey Buffer while documenting flora and fauna species and using Global Positioning System (GPS) technology to map dominant vegetation communities. Where appropriate, the biologists paused at select vantage points to provide full visual coverage of the Project site and the Survey Buffer. During the field survey, all plant and wildlife species observed or detected were recorded in a field notebook and/or onto the ESRI ArcGIS Collector application. Representative digital photographs were collected from various points within the Project area and the Survey Buffer. Binoculars were used as needed to identify wildlife species. Plant species observed were identified to species or subspecies level, when feasible, according to the nomenclature in *The Jepson Manual: Vascular Plants of California Edition 2* (Baldwin et al. 2012). Exotic ornamental species were identified to Genus-level only in some instances. Vegetation communities were described according to *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986) and annotated on the ESRI ArcGIS Collector application. Survey conditions are included in Table 1 below.

Table 1. Habitat Assessment Survey Conditions

Biologists	Date	Time	Air Temperature (°F)	Wind Speed (mph)	Cloud Cover (%)	Precipitation
Sarah Toback, Pablo Corcoran	1/23/2025	0910 – 1130	64 – 76	19 – 25	0%	None

The habitat assessment did not include focused or protocol level surveys for any special-status plant or wildlife species. Representative photographs of the Project site were taken during the field survey and are included in Attachment B.

Following the habitat assessment, potentials for special-status species to occur were evaluated based on proximity, recency and abundance of known occurrences, availability of suitable habitats, and historic distributions of the species. Potentials for occurrence were generally evaluated based on the following criteria:

- **Present** – The species (or definitive sign) was observed within the Project area during the survey effort.
- **High** – Historic records indicate that the species has been known to occur within the vicinity of the Project area (1 mile), and suitable habitat occurs onsite.
- **Moderate** – Historic records indicate that the species has been known to occur within the vicinity of the Project area, but low-quality suitable habitat occurs onsite, or; no historic records occur within the Project area, but the Project area occurs within the historic range of the species, and moderate to high quality habitat occurs.
- **Low** – Historic records indicate that the species has not been known to occupy the immediate

vicinity of the Project area, and low-quality habitat for the species exists onsite.

- **No Potential** – The species is restricted to habitats not occurring within the Project area or is considered extirpated from the Project area.

4.0 REGULATORY SETTING

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

4.1 Federal

4.1.1 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

4.1.2 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.

4.1.3 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.

4.1.4 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.

4.2 State

4.2.1 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 (CNDDDB) project. Informally listed taxa are not protected but warrant consideration in the preparation of biotic assessments. For some species, the CNDDDB 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.

4.2.2 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 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 clapper 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 clapper rail (*Rallus longirostris levipes*).
 - (10) Southern bald eagle (*Haliaeetus leucocephalus leucocephalus*).
 - (11) Trumpeter swan (*Cygnus buccinator*).
 - (12) White-tailed kite (*Elanus leucurus*).
 - (13) Yuma clapper 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."

4.3 Local

4.3.1 Orange County Transportation Authority NCCP/HCP

The Orange County Transportation Authority (OCTA) NCCP/HCP is designed to protect and manage the county's natural resources while allowing for planned transportation development. It focuses on preserving critical habitats, minimizing impacts on species and maintaining biodiversity. It ensures that the county's transportation infrastructure can be expanded or improved without jeopardizing these natural resources.

The proposed Project falls within the boundaries for the OCTA NCCP/HCP, however, this plan does not apply to the proposed Project, as it is not a transportation development project.

4.3.2 City of Orange Tree Preservation

Chapter 12.32 of the Orange Municipal Code, known as the Tree Preservation Ordinance, aims to protect and preserve trees within the City of Orange from undeveloped and public interest properties. The ordinance establishes guidelines for the removal and maintenance of trees, emphasizing the importance of trees in enhancing the city's aesthetic appeal, ecological health, and overall quality of life. A "tree" is defined by Section 12.32.020 as any "live plant which has a single trunk measuring 10.5 inches in circumference, measured at a point 24 inches above the ground level." A "historical tree", as defined by Section 12.32.060, are those trees "by virtue of their original size, uniqueness and/or national or regional rarity are now or are likely to be of historical value." Undeveloped property is defined as "any real property which has not been caused to progress to a more improved, advanced state of development.", and public interest property "shall be any property, privately owned or otherwise, whether developed or undeveloped, which has, because of the presence of certain trees of historical value in such property, become property endowed with a public interest." A permit is required for removing certain trees, particularly those deemed historical or located on public interest property. The Director of Public Works evaluates permit applications, considering factors like the tree's health, its proximity to structures, and its environmental impact.

An arborist will conduct an inventory of the site and produce an arborist report for the Project. The Department of Public Works will utilize this report to determine whether the proposed Project will be subject to this Tree Ordinance.

5.0 RESULTS

5.1 Literature Review Results

5.1.1 Special-status Species and Habitat

The literature review resulted in a total of **13** special-status wildlife species and **8** special-status plant species, and **one** special-status natural community known to occur within one mile of the Project site, or within the Orange, California 7.5- minute topographic quadrangle for the rare plant inventory produced by the CNPS search. According to the literature review, no USFWS-designated critical habitat, wetlands or hydrological features are mapped within the Survey Area. The resulting lists of target species and habitat is listed below.

Wildlife:

- Bald eagle (*Haliaeetus leucocephalus*)
- California black rail (*Laterallus jamaicensis coturniculus*)
- California least tern (*Sternula antillarum browni*)
- Coast horned lizard (*Phrynosoma blainvillii*)
- Coastal California gnatcatcher (*Poliophtila californica californica*)
- Golden eagle (*Aquila chrysaetos*)
- Least Bell's vireo (*Vireo bellii pusillus*)
- Southwestern pond turtle (*Actinemys pallida*)
- Western spadefoot (*Spea hammondi*)
- Santa Ana sucker (*Catostomus santaanae*)
- Southern California legless lizard (*Anniella stebbinsi*)
- Steelhead – southern California DPS (*Oncorhynchus mykiss irideus* pop. 10)
- Monarch butterfly (*Danaus plexippus*)

Plants:

- Chaparral sand-verbena (*Abronia villosa* var. *aurita*)

- Gambel's water cress (*Nasturtium gambelii*)
- Intermediate mariposa lily (*Calochortus weedii* var. *intermedius*)
- Many-stemmed dudleya (*Dudleya multicaulis*)
- Nevin's barberry (*Berberis nevinii*)
- Salt spring checkerbloom (*Sidalcea neomexicana*)
- Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*)
- Southern tarplant (*Centromadia parryi* ssp. *australis*)

Natural Community:

- Southern California Arroyo Chub/Santa Ana Sucker Stream

5.1.2 Soils

The Project site contains three different soil types, including: Myford sandy loam, 0 to 2 percent slopes; San Emigdio fine sandy loam, 0 to 2 percent slopes; and Sorrento loam, 0 to 2 percent slopes.

5.2 Habitat Assessment Results

The Project site occurs on a currently developed parcel consisting of three 2-story buildings, parking spaces, and landscaping. The site is overall flat with a slight slope to the west. Elevations within the Project site range from approximately 204 feet above mean sea level (AMSL) along the western edge to 220 feet AMSL along the eastern edge. The Project site is entirely developed, consisting of buildings, concrete parking spaces and walkways, and landscaped/ornamental trees and shrubs lining the parking areas, flanking the buildings, and surrounding the entire Project site. A small, disturbed strip of land occurs immediately outside the Project site, flanking the southern and eastern edges of the Project site. The remaining area of the Survey Buffer is developed land, consisting of major roads, sidewalks, and residential or industrial developments.

The Survey Area includes two land cover types: Urban/Developed (which includes ornamental landscaping) and Disturbed (Attachment A, Figure 6). The Survey Area consisted of 25 non-native plant species and zero native species. Of the 25 non-native plant species, three are considered invasive according to the California Invasive Plant Council (Cal-IPC 2006), all of which were observed within the disturbed habitat. Vegetative cover on the subject parcel ranged from 0% to 100%, depending on the area. Landscaped ornamental trees and shrubs provide vegetation cover along select areas of the periphery of and within the Project site, in contrast to the disturbed habitat dominated by low-growing grasses and herbs. The Project site does not provide suitable habitat for special-status native plant and wildlife species known to occur in the region.

5.2.1 Vegetation Communities and Land Use Types

A total of two land cover types were observed within the Project site: 12.08 acres of Urban/Developed (which includes ornamental landscaping) and 0.03 acres of Disturbed Habitat (Attachment A, Figure 6).

A total of two land cover types were observed within Survey Buffer: 6.90 acres of Urban/Developed and 0.83 acres of Disturbed Habitat.

Urban/Developed Habitat (Holland 12000)

Within the Project site and Survey Buffer, Urban/Developed habitat is generally characterized by the paved areas, building structures, and irrigated, ornamental species, including grasses, herbs, shrubs and trees that are nearly devoid of native vegetation. Urban/Developed habitat contained a wide variety of ornamental and/or non-native species, including but not limited to date palm (*Phoenix dactylifera*), Chinese elm (*Ulmus parvifolia*), Australian laurel (*Pittosporum tobira*), and Aleppo Pine (*Pinus halepensis*). Urban/Developed habitat included 12.08 acres of the Project site, plus 6.90 acres within the Survey Buffer.

The regional value of Urban/Developed habitat is low and lacks the necessary ecological components to support Federal or State-listed species and/or rare plants.

Disturbed Habitat (Holland 11300)

Within the Project site and Survey Buffer, Disturbed habitat is generally characterized by ruderal, non-native vegetation that is nearly devoid of native vegetation. Disturbed habitat contained a variety of non-native species, dominated by compact brome (*Bromus madritensis*), prickly lettuce (*Lactuca serriola*), long-beak filaree (*Erodium botrys*), slender oat (*Avena barbata*), cheeseweed mallow (*Malva parviflora*), and ribwort plantain (*Plantago lanceolata*). Disturbed habitat covered 0.03 acres within the southwest corner of the Project site and an additional 0.83 acres within the Survey Buffer.

The regional value of Disturbed habitat is low and lacks the necessary ecological components to support Federal or State-listed species and/or rare plants.

5.2.2 Special-status Natural Communities

The literature review resulted in one sensitive natural community within one mile of the Project site: Southern California Arroyo Chub/Santa Ana Sucker Stream. This habitat does not occur within the Survey Area.

5.2.3 Special-Status Wildlife Species

A total of 13 special-status wildlife species were evaluated for potential to occur within the Survey Area. As the Survey Area consists only of Urban/Developed land and Disturbed habitat, the field evaluation determined that the site lacks suitable habitats for all but one wildlife species evaluated. Monarch butterfly (FPT) is the only wildlife species evaluated for that has a low potential to occur on-site due to the presence of nectar sources within the landscaped ornamental vegetation, but a lack of host plant (milkweeds; *Asclepias* spp.) and preferred winter roosting sites within the Survey Area provides low-quality habitat for this species. All other special-status species evaluated have no potential to occur due to the lack of suitable foraging, nesting, and/or breeding habitat with the Project site and surrounding area. Furthermore, the Survey Area is almost entirely surrounded by Urban/Developed land with small areas of disturbed habitat and no direct connectivity to open, natural spaces that would support special-status species. A complete list of wildlife species observed is included in Attachment C.

5.2.4 Special-Status Plant Species

A total of eight special-status plant species were evaluated for potential to occur at the Project site. The field evaluation determined that all eight plant species evaluated have no potential to occur within the Project site due to the lack of suitable habitat, lack of suitable soils, high level of anthropogenic disturbance, outside of known range, and/or lack of recent historical records. Furthermore, A complete list of plant species observed is included in Attachment D.

5.2.5 Aquatic Resources

No natural drainage features, wetlands, non-wetland waters, or riparian areas potentially regulated by USACE, RWQCB and/or CDFW are present within the Survey Area.

6.0 PROJECT IMPACTS AND MITIGATION MEASURES

This section includes a discussion of the potential direct 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.

6.1 Vegetation Communities and Land Cover Types

Development of the proposed Project will result in direct impacts to Urban/Developed land. Impacts to Urban/Developed land is not anticipated to impact any special-status vegetation communities.

6.1.2 Special-status Wildlife Species

A total of 13 Federal-, State-listed and/or otherwise special-status wildlife species were evaluated during the literature review and habitat assessment survey. Monarch butterfly is the only species with a low potential to occur on site with no host plants or preferred winter roosting sites occurring within the Survey Area, therefore direct impacts to this species are not anticipated with the proposed Project construction. Impacts to special-status wildlife species are not anticipated from the proposed Project construction, due to the lack of potential or low potential to occur within or adjacent to the Project site.

6.1.3 Special-status Plant Species

Although the literature review revealed eight special-status plant species occurring within one mile of the Project site, none were observed during the field survey within the Project site or the Survey Buffer. Furthermore, no suitable habitat for these rare plant species occurs on the Project site (Attachment A, Figure 2). As a result of landscaping, development, anthropogenic disturbance, and lack of connectivity to natural source populations, special-status plant species, including narrow endemics, are not expected to occur within the Project site. Project development is not anticipated to result in direct impacts to special-status plant species.

6.1.4 General Biological Resources

Development of the proposed Project will have minimal impact on general biological resources, as the proposed Project site is already developed. Small mammals, reptiles, and/or birds utilizing the landscaped ornamental vegetation may be impacted through mortality or displacement from the loss of nesting and/or foraging habitat. Implementation of the proposed Project is not anticipated to have a significant cumulative impact on the overall biological resources in the region since it is already of low-quality habitat. Impacts to listed birds, migratory birds covered under the MBTA, and/or raptors

can be minimized and/or avoided by implementing BIO-1 mitigation measure, outlined below in Section 6.2.

6.2 Mitigation Measures

BIO-1: 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.

7.0 SURVEYOR CERTIFICATION

All data, statements, analyses, findings and attachments within this report are accurate and truthful in terms of describing the existing conditions and the Project as proposed to Blackhawk Environmental. Re-development of the Project site does not warrant compensatory mitigation, drawing credits from a mitigation bank or on-site habitat restoration. Implementation of appropriate Best Management Practices (BMP), Project design features, and environmental commitments will result in impacts to plant and wildlife species (including MBTA-covered avian species) being avoided, reduced, and/or minimized. Every effort to avoid impacting special-status species and nesting birds and raptors will be implemented, including compliance with the MBTA and California Fish and Game Code Sections of the 3500 series.

If there are any questions or concerns regarding the findings of this report, please contact me at (585) 739-9864 or hayley@blackhawkenv.com.

Sincerely,



Hayley Milner
Staff Biologist



ATTACHMENTS

A: Figures

B: Representative Photographs

C: Wildlife Species Observed

D: Plant Species Observed

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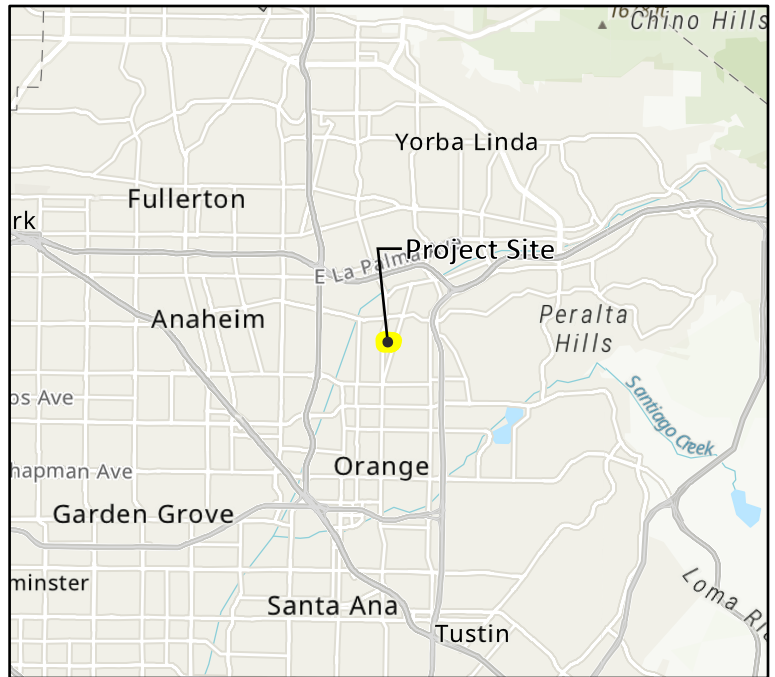
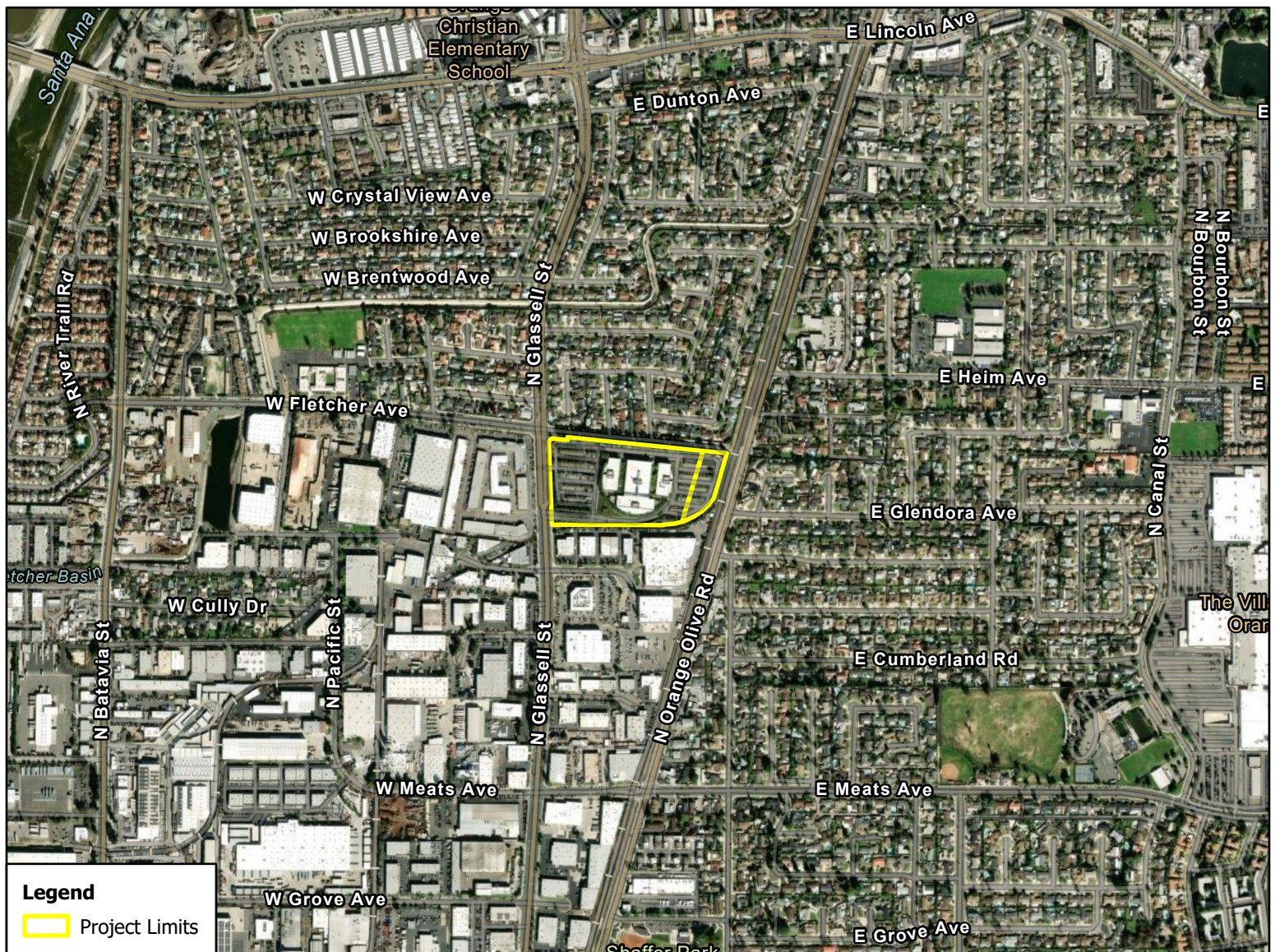
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ATTACHMENT A

Figures





Legend
 Project Limits

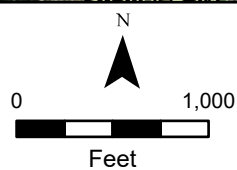


Figure 1
Project Vicinity and Location

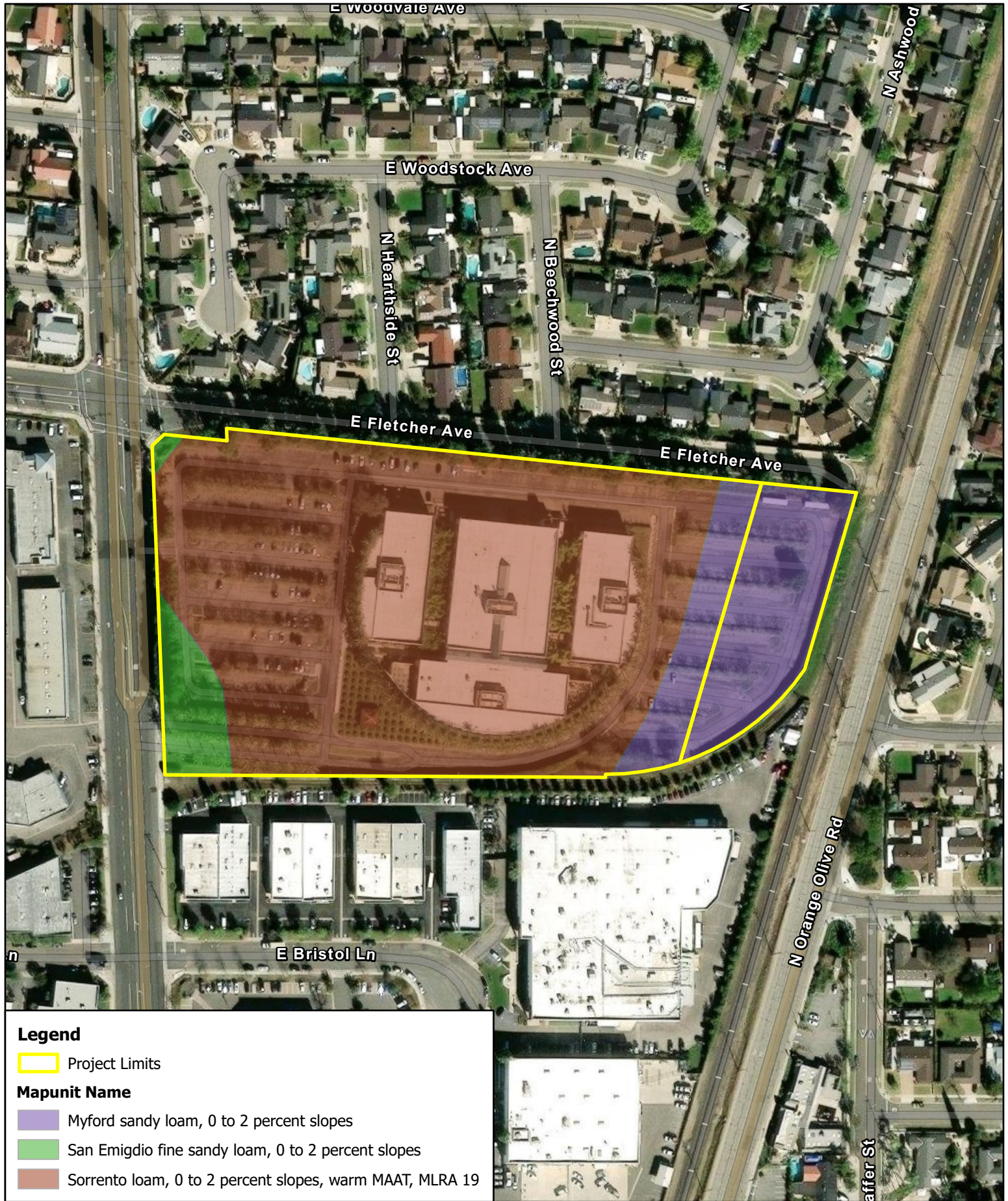
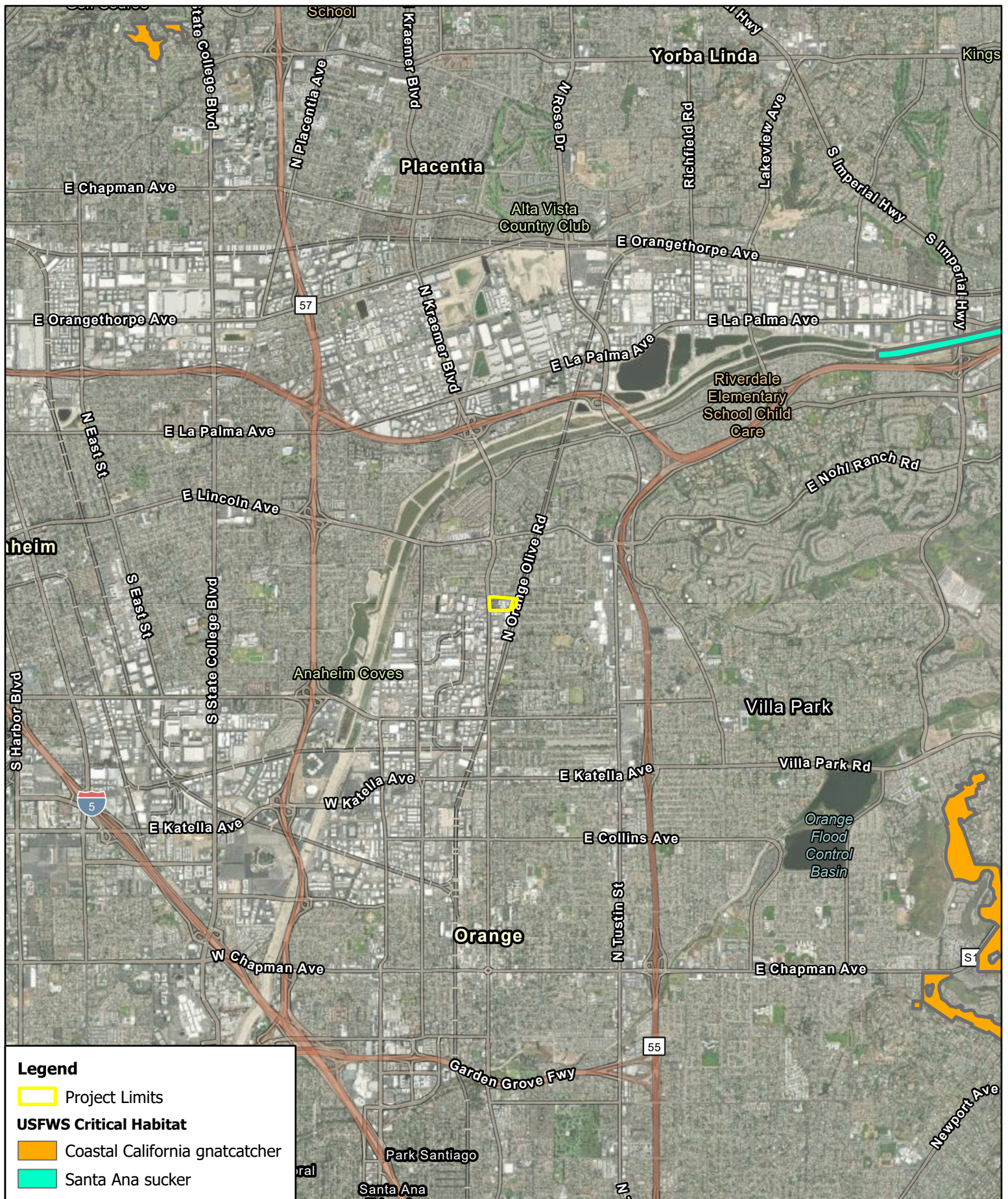


Figure 2
Soils



Figure 3 Hydrology

2411 North Glassell Street



ATTACHMENT B

Site Photographs





Photograph 1: East-facing view of the northern boundary of the Project site along East Fletcher Avenue.



Photograph 2: South-facing view of the western boundary of the Project site along North Glassell Street.



Photograph 3: Southeast-facing view of developed land consisting of parking areas and landscaped ornamentals within the Project site, taken from the northwest corner.



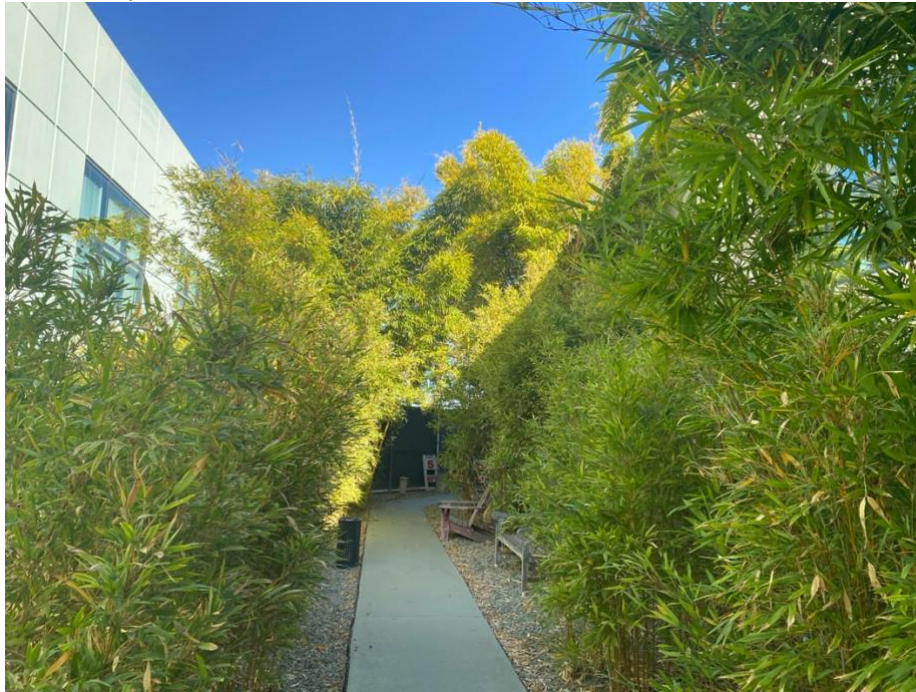
Photograph 4: Northeast-facing view of the existing southern entrance off North Glassell Street.



Photograph 5: Northeast-facing view of the existing buildings surrounded by landscaped ornamentals.



Photograph 6: Southwest-facing view of parking spaces and landscaped ornamentals on the east side of the Project Site.



Photograph 7: North-facing view of common bamboo (*Bambusa vulgaris*) lining the walkways between buildings.



Photograph 8: West-facing view of landscaped ornamentals lining the walkways between buildings.



Photograph 9: East-facing view of disturbed habitat associated with the abandoned railroad tracks within the southern Survey Buffer.



Photograph 10: East-facing view of developed land south of the railroad tracks within the Survey Buffer.

ATTACHMENT C

Wildlife Species Observed



WILDLIFE SPECIES OBSERVED

AVES	BIRDS
ACCIPITRIDAE	Kites, Hawks, Eagles, and Allies
<i>Buteo jamaicensis</i>	red-tailed hawk
CORVIDAE	Crows & Jays
<i>Corvus brachyrhynchos</i>	American crow
FALCONIDAE	Falcons
<i>Falco sparverius</i>	American kestrel
FRINGILLIDAE	Finches and Allies
<i>Haemorhous mexicanus</i>	house finch
PARULIDAE	New World Warblers
<i>Setophaga coronata</i>	yellow-rumped warbler
PASSERELLIDAE	New World Sparrows
<i>Zonotrichia leucophrys</i>	white-crowned sparrow
ZOSTEROPIDAE	White-eyes
* <i>Zosterops simplex</i>	Swinhoe's white eye

*Non-native

ATTACHMENT D

Plant Species Observed



OBSERVED PLANT SPECIES LIST

MONOCOTS

ARECACEAE	Palm Family
* <i>Phoenix dactylifera</i>	date palm
POACEAE	Grass Family
** <i>Avena barbata</i>	slender oat
* <i>Bambusa vulgaris</i>	common bamboo
** <i>Bromus madritensis</i>	compact brome
* <i>Pyllostachys aurea</i>	fish poll bamboo

DICOTS

ANACARDIACEAE	Sumac Family
** <i>Schinus molle</i>	Peruvian pepper tree
APOCYNACEAE	Dogbone Family
* <i>Carissa macrocarpa</i>	natal plum
ARALIACEAE	Ginseng Family
** <i>Hedera helix</i>	English ivy
ASTERACEAE	Sunflower Family
* <i>Lactuca serriola</i>	prickly lettuce
* <i>Taraxacum officinale</i>	common dandelion
CARYOPHYLLACEAE	Carnation Family
* <i>Stellaria media</i>	chickweed
GERANIACEAE	Geranium Family
* <i>Erodium botrys</i>	long-beak filaree/storksbill
MALVACEAE	Mallow Family
* <i>Malva parviflora</i>	cheeseweed mallow
MYRTACEAE	Myrtle Family
* <i>Lophostemon confertus</i>	brush box
* <i>Syzygium paniculatum</i>	brush cherry
NYCTAGINACEAE	Four O'clock Family
* <i>Bougainvillea</i> sp.	bougainvillea
OLEACEAE	Olive Family
* <i>Ligustrum japonicum</i>	wax-leaf privet
PITOSPORACEAE	Pittosporum Family
* <i>Pittosporum tobira</i>	Australian laurel
PLANTAGINACEAE	Plantain Family
** <i>Plantago lanceolata</i>	ribwort plantain
ROSACEAE	Rose Family
* <i>Prunus caroliniana</i>	Carolina cherry
* <i>Raphiolepis indica</i>	Indian hawthorn
SAPINDACEAE	Soapberry Family

* <i>Cupaniopsis anacardioides</i>	carrotwood
ULMACEAE	Elm Family
* <i>Ulmus parvifolia</i>	Chinese elm
VERBENACEAE	Verbena Family
* <i>Lantana montevidensis</i>	trailing lantana

GYMNOSPERMS

PINACEAE	Pine Family
* <i>Pinus halepensis</i>	Aleppo pine

*Non-native

**Non-native and invasive according to the California Invasive Plant Council