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SUBJECT: **Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis for the Proposed Bradley Gardens Project Located Within Assessor Parcel Number (APN) 435-330-003 in the City of San Jacinto, Riverside County, California**

Introduction

This report contains the findings of ELMT Consulting's (ELMT) habitat assessment and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis for the proposed Bradley Gardens Project located within APN 435-330-003 in the City of San Jacinto, Riverside County, California. The habitat assessment was conducted by ELMT biologist Andrew N. Mestas on February 6, 2026, to document baseline conditions and assess the potential for special-status[1] plant and wildlife species to occur within the proposed Project site that could pose a constraint to implementation of the proposed Project. Special attention was given to the suitability of the onsite habitat to support special-status species identified by the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) and other electronic databases as potentially occurring on or within the general vicinity of the Project site.

The Western Riverside County Regional Conservation Authority (RCA) MSHCP Information Map was queried to determine if the MSHCP identifies any potential survey requirements for the Project. Further, the Project site was reviewed against the MSHCP to determine if the site is located within any MSHCP areas including Criteria Cells (core habitat and wildlife movement corridors) or areas proposed for conservation. Based on the RCA MSHCP Information Map query and review of the MSHCP, it was determined that the Project site is located within the San Jacinto Valley Area Plan of the MSHCP but is not located within any Criteria Cells or MSHCP Conservation Areas. Further, it was determined that the Project site is not located within any designated survey areas.

Project Location

The Project site is generally located east of Interstate 215, north of State Route 74, and south and west of State Route 79 in the City of San Jacinto, Riverside County, California. The Project site is depicted on the San Jacinto quadrangle of the of the United States Geological Survey's (USGS) 7.5-minute topographic

1 As used in this report, "special-status" refers to plant and wildlife species that are federally, State, and MSHCP listed, proposed, or candidates; plant species that have been designated with a California Native Plant Society Rare Plant Rank; wildlife species that are designated by the CDFW as fully protected, species of special concern, or watch list species; and specially protected natural vegetation communities as designated by the CDFW.

map within an unsectioned region of Township 4 South, and Range 1 West. Specifically, the Project site is bordered to the north by West 7th Street and to the west by South Grand Avenue within Assessor's Parcel Number (APN) 435-330-003. Refer to Exhibits 1-3 in Attachment A.

Project Description

The Project proposes the expansion of the existing Bradley Gardens facility on the 2.98-acre site. The Project includes demolition of the existing 1,074 SF maintenance and storage building located in the southeastern corner of the site for construction of an expansion to the existing 44-bed SNF building. The proposed building addition would total approximately 17,372 SF and would provide 43 additional SNF and STP beds, resulting in a total capacity of 87 beds. The Project also proposes the conversion of the existing 2,596 SF vacant office building located in the northwestern corner of the site into a 16-bed PHF. The Project would not modify the existing 2,609 SF administrative office building along the western boundary of the site. Additional improvements would include landscaping, utility connections, implementation of stormwater facilities, lighting, parking lot, and driveways.

Methodology

Literature Review

The first step in determining if a Project is consistent with the above listed sections of the MSHCP is to conduct a literature review and records search for special-status biological resources potentially occurring on or within the vicinity of the Project site. Previously recorded occurrences of special-status plant and wildlife species and their proximity to the Project were determined through a query of the CDFW's CNDDB Rarefind 5, the California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California, Calflora Database, compendia of special-status species published by CDFW, United States Fish and Wildlife Service (USFWS) species listings, and species covered within the MSHCP and associated technical documents.

All available reports, survey results, and literature detailing the biological resources previously observed on or within the vicinity of the Project site were reviewed to understand existing site conditions and note the extent of any disturbances that have occurred on the Project site that would otherwise limit the distribution of special-status biological resources. Standard field guides and texts were reviewed for specific habitat requirements of special-status and non-special-status biological resources, as well as the following resources:

- Environmental Protection Agency (EPA) Water Program "My Waters" data layers
- Google Earth Pro historic aerial imagery (1994-2026);
- United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Soil Survey[2];
- USFWS Critical Habitat designations for Threatened and Endangered Species;
- USFWS National Wetlands Inventory (NWI);
- Stephen's Kangaroo Rat Habitat Conservation Plan;

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

- Western Riverside County Regional Conservation Authority (RCA) MSHCP Information Map; and
- 2006 Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area.

The literature review provided a baseline from which to inventory the biological resources potentially occurring on the Project site. The CNDDB database was used, in conjunction with ArcGIS software, to locate the nearest recorded occurrences of special-status species and determine the distance from the Project.

Field Investigation

Following the literature review, biologist Andrew N. Mestas inventoried and evaluated the condition of the habitat within the Project site on February 6, 2026. Plant communities identified on aerial photographs during the literature review were verified by walking meandering transects through the plant communities and along boundaries between plant communities. In addition, aerial photography was reviewed prior to the site investigation to locate potential natural corridors and linkages that may support the movement of wildlife through the area. These areas identified via aerial photography were then walked during the field survey.

All plant and wildlife species observed, as well as dominant plant species within each plant community, were recorded. Plant species observed during the field survey were identified by visual characteristics and morphology in the field. Unusual and less familiar plant species were photographed during the field survey and identified in the laboratory using taxonomical guides. Wildlife detections were made through observation of scat, trails, tracks, burrows, nests, and/or visual and aural observation. In addition, site characteristics such as soil condition, topography, hydrology, anthropogenic disturbances, indicator species, condition of onsite plant communities, and presence of potential jurisdictional drainage and/or wetland features were noted.

Soil Series Assessment

Onsite and adjoining soils were researched prior to the field survey using the USDA NRCS Soil Survey for the Western Riverside area. In addition, a review of the local geological conditions and historical aerial photographs was conducted to assess the ecological changes that the Project site has undergone.

Plant Communities

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

Plants

Common plant species observed during the field survey were identified by visual characteristics and morphology in the field and recorded in a field notebook. Unusual and less-familiar plants were photographed in the field and identified in the laboratory using taxonomic guides. Taxonomic nomenclature

used in this study follows the 2012 Jepson Manual (Hickman 2012). In this report, scientific names are provided immediately following common names of plant species (first reference only).

Wildlife

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

Jurisdictional Drainages and Wetlands

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

Topography and Soils

The Project site ranges in elevation from approximately 1,525 to 1,529 feet above mean sea level. Onsite topography is generally flat. Based on the NRCS USDA Web Soil Survey, the Project site is underlain by the following soil units: Grangeville sandy loam (sandy substratum, drained, 0 to 5 percent slopes) and Grangeville fine sandy loam (saline-alkali, 0 to 5 percent slopes). Onsite soils have been heavily disturbed and compacted as a result of historic and ongoing land uses, including grading, weed abatement, vehicular use, and both onsite and surrounding development activities.

Existing Site Condition

The Project site supports entirely developed land that has been subject to a variety of anthropogenic disturbances associated with on-site development, and routine weed abatement activities. Natural plant communities that historically occurred on the Project site have been eliminated.

The Project site is bounded to the east, south, and west by vacant land and residential development; to the north by West 7th Street and commercial development. Historical aerial imagery indicates that development has existed within the site since at least 1966.

Vegetation

The Project site does not support any natural plant communities. In addition, the site supports one (1) land

cover types that would be classified as developed (refer to Exhibit 4, *Vegetation*, in Attachment A). Refer to Attachment B, *Site Photographs*, for representative site photographs.

Developed

Developed land cover is present throughout the entirety of the project site. Developed areas generally encompass all buildings/structures, parks, and paved, impervious surfaces. These areas are largely devoid of natural vegetation and may support ornamental vegetation that may be maintained in association with or without artificial irrigation.

Vegetation observed within the project site included common ornamental species such as: Mexican fan palm (*Washingtonia robusta*), rose (*Rosa spp.*), creeping thyme (*Thymus serpyllum*), bougainvillea (*Bougainvillea glabra*), magnolia (*Magnolia grandiflora*). Other species observed included: Matilija poppy (*Romneya coulterii*), London rocket (*Sisymbrium irio*), common dandelion (*Taraxacum officinale*), stinknet (*Oncosiphon piluliferum*), and red-stemmed filaree (*Erodium cicutarium*).

Wildlife

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

Fish

The MSHCP does not identify any covered or special-status fish species as potentially occurring within the Project site. Further, no fish or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for fish were observed on or within the vicinity of the site. Therefore, no fish are expected to occur and are presumed absent.

Amphibians

The MSHCP does not identify any covered or special-status amphibian species as potentially occurring within the Project site. The Project site does not support hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for amphibian species. Further, no amphibians were observed, and all are presumed to be absent from the Project site.

Reptiles

The MSHCP does not identify any covered or special-status reptilian species as potentially occurring within the Project site. The site and surrounding area provide suitable foraging and cover habitat for reptile species adapted to routine anthropogenic disturbance. The only reptilian species observed during the field investigation was common side-blotched lizard (*Uta stansburiana*). Additional reptile species that may be expected to occur onsite include the Great Basin fence lizard (*Sceloporus occidentalis longipes*) and Southern alligator lizard (*Elgaria multicarinata webbii*).

Birds

The Project site and surrounding area provides suitable foraging and nesting habitat for local avian species, especially those adapted to routine anthropogenic disturbance. Bird species detected during the field survey included black phoebe (*Sayornis nigricans*), house sparrow (*Passer domesticus*), American crow (*Corvus branchyrhynchos*), yellow-rumped warbler (*Setophaga coronata*), house finch (*Haemorhous mexicanus*), and common raven (*Corvus corax*).

Mammals

The MSHCP does not identify any covered or special-status mammalian species as potentially occurring within the Project site. The site provides minimal suitable foraging and cover habitat for mammalian species adapted to degraded conditions and routine anthropogenic disturbance. Mammalian species detected included Botta's pocket gopher (*Thomomys bottae*) and domestic goat (*Capra hircus*). Other common mammalian species that could be expected to occur include possum (*Didelphis virginiana*) and raccoon (*Procyon lotor*).

Nesting Birds and Raptors

No active nests or birds displaying nesting behavior were observed during the field survey, which was conducted outside of the breeding season. Although subjected to routine disturbance, the plant communities and land cover types supported onsite have the potential to provide suitable nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that may occur in the area that are adapted to urban environments. Ornamental tree species occur within the project site and have the potential to support nesting birds tolerant to urban conditions.

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

Migratory Corridors and Linkages

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

The Project site has not been identified as supporting a wildlife migratory corridor or linkage. The nearest RCA-conserved lands are located approximately 2.5 miles east of the Project site, within the San Jacinto River Soboba area, which provides opportunities for wildlife movement through the region. However, the Project site is separated from the RCA conserved lands by existing development and highly trafficked roads. Additionally, areas within the RCA conserved lands are covered under the MSHCP plans for conservation. Further, the project site support existing developed land, and as such, implementation of the proposed

Project is not expected to have any impact to wildlife movement opportunities or prevent local wildlife movement through the area.

Jurisdictional Areas

There are three key agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The Corps Regulatory Branch regulates discharge of dredge or fill materials into "waters of the United States" pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates alterations to streambed and bank under Fish and Wildlife Code Sections 1600 et seq., and the Regional Board regulates discharges into surface waters pursuant to Section 401 of the CWA and the California Porter-Cologne Water Quality Control Act.

No jurisdictional drainages and/or wetland features were observed within site boundaries during the field investigation. A roadside ditch is present along the northern boundary of the site, on the southern shoulder of W 7th Street. The roadside ditched receives stormwater runoff from the road. Since this feature is considered a roadside ditch, and was constructed to convey some flows off of the road, it will not be considered jurisdictional. herefore, development of the project will not result in impacts to Corps, Regional Board, or CDFW jurisdiction and regulatory approvals will not be required.

Special-Status Biological Resources

The CNDDB was queried for reported locations of special-status plant and wildlife species as well as natural communities of special concern in the San Jacinto USGS 7.5-minute quadrangle. Only one quadrangle was queried due to the proximity of the Project site to quadrangle boundaries. A search of published records within these quadrangles was conducted using the CNDDB Rarefind 5 online software and the CDFW BIOS database and the CNPS Inventory of Rare and Endangered Plants of California that supplied information regarding the distribution and habitats of vascular plants in the vicinity of the Project site. The habitat assessment evaluated the conditions of the habitat(s) within the boundaries of the Project site to determine if the existing plant communities, at the time of the survey, have the potential to provide suitable habitat(s) for special-status plant and wildlife species.

The literature search identified twelve (12) special-status plant species, sixty-nine (69) special-status wildlife species, and four (4) special-status plant communities as having potential to occur within the San Jacinto quadrangle. Special-status plant and wildlife species were evaluated for their potential to occur within the Project site based on habitat requirements, availability, and quality of suitable habitat, and known distributions. Species determined to have the potential to occur within the general vicinity are presented in *Table C-1: Potentially Occurring Special-Status Biological Resources*, provided in Attachment C. Refer to Table C-1 for a determination regarding the potential occurrence of special-status plant and wildlife species within the Project site.

Special-Status Plants

According to the CNDDB and CNPS, twelve (12) special-status plant species have been recorded in the San Jacinto quadrangle (refer to Attachment C). No special-status plant species were observed onsite during the field investigation. The majority of the Project site has been subject to a variety of anthropogenic disturbances associated with the existing development. These disturbances have diminished the natural plant communities that once occurred which have diminished the ability of the habitat in these areas to

provide suitable habitat for special-status plant species known to occur in the general vicinity. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats, the Project site was determined not to provide suitable habitat for any of the special-status plant species known to occur in the area and all are presumed to be absent. No focused surveys are recommended.

Special-Status Wildlife

According to the CNDDB, sixty-nine (69) special-status wildlife species have been reported in the San Jacinto quadrangle (refer to Attachment C). No special-status wildlife species were observed onsite during the habitat assessment. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the project site has a moderate potential to support Cooper's hawk (*Astur cooperii*) All remaining special-status wildlife species were presumed to be absent from the project site due to existing development.

To ensure impacts to the aforementioned special-status avian species do not occur from implementation of the proposed project, a pre-construction nesting bird clearance survey shall be conducted prior to ground disturbance. With implementation of the pre-construction nesting bird clearance survey, impacts to these species will be less than significant and no mitigation will be required.

Special-Status Plant Communities

According to the CNDDB, four (4) special-status plant communities have been reported in the San Jacinto quadrangle (refer to Attachment C). No special-status plant communities occur onsite.

Critical Habitat

Under the federal Endangered Species Act, "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. Maintenance of these physical and biological features requires special management considerations or protection, regardless of whether individuals or the species are present or not. All federal agencies are required to consult with the United States Fish and Wildlife Service (USFWS) regarding activities they authorize, fund, or permit which may affect a federally listed species or its designated Critical Habitat. The purpose of the consultation is to ensure that Projects will not jeopardize the continued existence of the listed species or adversely modify or destroy its designated Critical Habitat. The designation of Critical Habitat does not affect private landowners, unless a Project they are proposing is on federal lands, uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highways Administration or a CWA Permit from the Corps). If there is a federal nexus, then the federal agency that is responsible for providing the funding or permit would consult with the USFWS.

The Project site is not located with federally designated Critical Habitat (refer to Exhibit 5, *Critical Habitat*, in Attachment A). The nearest designated Critical Habitat to the site is located approximately 2.5 miles to the east for San Bernardino Merriam's kangaroo rat (*Dipodomys merriami parvus*) and is separated from the Project site by existing development. Therefore, the loss or adverse modification of Critical Habitat will not occur as a result of the proposed Project and consultation with the USFWS will not be required for impacts to Critical Habitat.

Western Riverside County MSHCP

The Project site is located in the San Jacinto Valley Area Plan of the MSHCP but is not located within any Criteria Cells or designated conservation areas (Exhibit 6, *MSHCP Conservation Areas*). Additionally, the Project site is not located within any MSHCP designated survey areas.

Since the City of San Jacinto and Riverside County are permittees under the MSHCP and, while the Project is not specifically identified as a Covered Activity under Section 7.1, *Covered Activities Outside Criteria Area and PQP Lands*, of the MSHCP, public and private development that are outside of Criteria Areas and Public/Quasi-Public (PQP) Lands are permitted under the MSHCP, subject to consistency with MSHCP policies that apply to area outside of Criteria Areas. As such, to achieve coverage, the Project must be consistent with the following policies of the MSHCP:

- The policies for the protection of species associated with Riparian/Riverine areas and vernal pools as set forth in Section 6.1.2 of the MSHCP;
- The policies for the protection of Narrow Endemic Plant Species as set forth in Section 6.1.3;
- The Urban/Wildlands Interface Guidelines as set forth in Section 6.1.4; and
- The requirements for conducting additional surveys as set forth in Section 6.3.2

Riparian/Riverine Areas

As identified in Section 6.1.2 of the MSHCP, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools,* riparian/riverine areas are defined as areas dominated by trees, shrubs, persistent emergent plants, or emergent mosses and lichens which occur close to or are dependent upon nearby freshwater, or areas with freshwater flowing during all or a portion of the year. Conservation of these areas is intended to protect habitat that is essential to a number of listed or special-status water-dependent fish, amphibian, avian, and plant species. If impacts to riparian/riverine habitat cannot be avoided, a Determination of Biologically Equivalent or Superior Preservation (DBESP) must be developed to address the replacement of lost functions of habitats in regard to the listed species. This assessment is independent from considerations given to "waters of the U.S." and "waters of the State" under the CWA and the California Fish and Game Code.

No jurisdictional drainages, riparian/riverine and/or wetland features were observed within the project site during the field investigation. Development of the proposed project will not result in impacts to riparian/riverine habitats and a DBESP will not be required for the loss of riparian/riverine habitat from development of the proposed project. Therefore, the project is consistent with Section 6.1.2 of the MSHCP.

Vernal Pools and Fairy Shrimp Habitat

One of the factors for determining the suitability of the habitat for fairy shrimp would be demonstrable evidence of seasonal ponding in an area of topographic depression that is not subject to flowing waters. These astatic pools are typically characterized as vernal pools. More specifically, vernal pools are seasonal wetlands that occur in depression areas without a continual source of water. They have wetland indicators of all 3 parameters (soils, vegetation, and hydrology) during the wetter portion of the growing season but normally lack wetland indicators of hydrology and/or vegetation during the drier portion of the growing season. Obligate hydrophytes and facultative wetlands plant species are normally dominant during the

wetter portion of the growing season. The determination that an area exhibits vernal pool characteristics and the definition of the watershed supporting vernal pool hydrology is made on a case-by-case basis. Such determinations should be considered the length of time the areas exhibit upland and wetland characteristics and the manner in which the area fits into the overall ecological system as a wetland. The seasonal hydrology of vernal pools provides for a unique environment, which supports plants and invertebrates specifically adapted to a regime of winter inundation, followed by an extended period when the pool soils are dry.

Vernal pools are seasonally inundated, ponded areas that only form in regions where specialized soil and climatic conditions exist. During fall and winter rains typical of Mediterranean climates, water collects in shallow depressions where downward percolation of water is prevented by the presence of a hard pan or clay pan layer (duripan) below the soil surface. Later in the spring when rains decrease and the weather warms, the water evaporates and the pools generally disappear by May. The shallow depressions remain relatively dry until late fall and early winter with the advent of greater precipitation and cooler temperatures. Vernal pools provide unusual "flood and drought" habitat conditions to which certain plant and wildlife species have specifically adapted as well as invertebrate species such as fairy shrimp.

The MSHCP lists two general classes of soils known to be associated with listed and special-status plant species; clay soils and Traver-Domino Willow association soils. The specific clay soils known to be associated with listed and special-status species within the MSHCP plan area include Bosanko, Auld, Altamont, and Porterville series soils, whereas Traver-Domino Willows association includes saline-alkali soils largely located along floodplain areas of the San Jacinto River and Salt Creek. Without the appropriate soils to create the impermeable restrictive layer, none of the special-status plant or wildlife species associated with vernal pools can occur on the Project site. None of these soils have been documented within the Project site.

A review of recent and historic aerial photographs (1994–2026) of the Project site did not identify visual evidence of astatic or vernal pool conditions. These observations support the conclusion that the project site does not support the hydrologic regimes necessary to support vernal pool conditions.

Based on the analysis of historical aerial photography and findings from recent field surveys, there is no evidence of vernal pools or habitat conditions suitable for fairy shrimp within the boundaries of the proposed Project site. As such, the Project is consistent with the requirements outlined in Section 6.1.2 of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

Narrow Endemic Plant Species

Section 6.1.3 of the MSHCP, *Protection of Narrow Endemic Plant Species*, states that the MSHCP database does not provide sufficient detail to determine the extent of the presence/distribution of Narrow Endemic Plant Species within the MSHCP Plan Area. Additional surveys may be needed to gather information to determine the presence/absence of these species to ensure that appropriate conservation of these species occurs. Based on the RCA MSHCP Information Map query and review of the MSHCP, it was determined that the Project site is not located within a Narrow Endemic Plant Species Survey Area. The project site supports existing development and heavily disturbed land that does not provide suitable habitat for Narrow Endemic Plant Species. As such, the Project is consistent with the requirements outlined in Section 6.1.3 of the MSHCP.

Additional Survey Needs and Procedures

In accordance with Section 6.3.2 of the MSHCP, *Additional Survey Needs and Procedures*, additional surveys may be needed for certain species in order to achieve coverage for these species. The query of the RCA MSHCP Information Map and review of the MSHCP determined that the Project site is not located within the any designated species survey area. The project site supports existing development and heavily disturbed land that does not provide suitable habitat for and MSHCP listed species. As such, are result, the Project is consistent with the requirements outlined in Section 6.2.3 of the MSHCP.

Urban/Wildlands Interface Guidelines

Section 6.1.4 of the MSHCP, *Guidelines Pertaining to Urban/Wildlands Interface,* is intended to address indirect effects associated with development in proximity to MSHCP Conservation Areas. The Urban/Wildlife Interface Guidelines are intended to ensure that indirect Project-related impacts to the MSHCP Conservation Area, including drainage, toxics, lighting, noise, invasive plant species, barriers, and grading/land development, are avoided or minimized. The Project site is not located within or immediately adjacent to any Criteria Cells, corridors, or linkages. The urban/Wildlands Interface Guidelines do not apply to this Project, and, therefore, the Project is consistent with Section 6.1.4 of the MSHCP.

Stephen's Kangaroo Rat Habitat Conservation Plan

Separate from the consistency review against the policies of the MSHCP, Riverside County established a boundary in 1996 for protecting the Stephens' kangaroo rat (*Dipodomys stephensi*), a federally endangered and state threatened species. The Stephens' kangaroo rat is protected under the Stephens' Kangaroo Rat Habitat Conservation Plan (County Ordinance No. 663.10; SKR HCP). As described in the MSHCP Implementation Agreement, a Section 10(a) Permit, and California Fish and Game Code Section 2081 Management Authorization were issued to the Riverside County Habitat Conservation Agency (RCHCA) for the Long-Term SKR HCP and was approved by the USFWS and CDFW in August 1990 (RCHCA 1996). Relevant terms of the SKR HCP have been incorporated into the MSHCP and its Implementation Agreement. The SKR HCP will continue to be implemented as a separate HCP; however, to provide the greatest conservation for the largest number of Covered Species, the Core Reserves established by the SKR HCP are managed as part of the MSHCP Conservation Area consistent with the SKR HCP. Actions shall not be taken as part of the implementation of the SKR HCP that will significantly affect other Covered Species. Take of Stephens' kangaroo rat outside of the boundaries but within the MSHCP area is authorized under the MSHCP and the associated permits.

The Project site is not located within the Mitigation Fee Area of the SKR HCP. Therefore, the applicant will not be required to pay the SKR HCP Mitigation Fee.

Conclusion

Based on the literature review and field survey, implementation of the Project will have no significant impacts on federally, State, or MSHCP listed species known to occur in the general vicinity of the Project site. The Project site was determined not to have suitable conditions to support any special-status species known to occur in the vicinity. With completion of the recommendations provided below, no impacts to year-round, seasonal, or special-status avian residents will occur from implementation of the proposed Project.

Additionally, the project will have no effect on designated Critical Habitat, since there is no federal nexus, or regional wildlife corridors/linkage. No riverine/riparian features were identified within the project site, therefore, the proposed project is consistent with Section 6.1.2 of the MSHCP. With implementation of the recommended measures and payment of the MSHCP Local Development Mitigation Fee, development of the Project site would be fully consistent with the MSHCP.

Recommendations

Migratory Bird Treaty Act and Fish and Game Code Compliance

Vegetation within and surrounding the Project site has the potential to provide refuge cover from predators, perching sites and favorable conditions for avian nesting that could be impacted by construction activities associated with the Project. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. Consequently, if avian nesting behaviors are disrupted, such as nest abandonment and/or loss of reproductive effort, it is considered "take" and is potentially punishable by fines and/or imprisonment.

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

Please do not hesitate to contact Travis McGill at (909) 816-1646 or travismcgill@elmtconsulting.com should you have any questions regarding this report.

Sincerely,



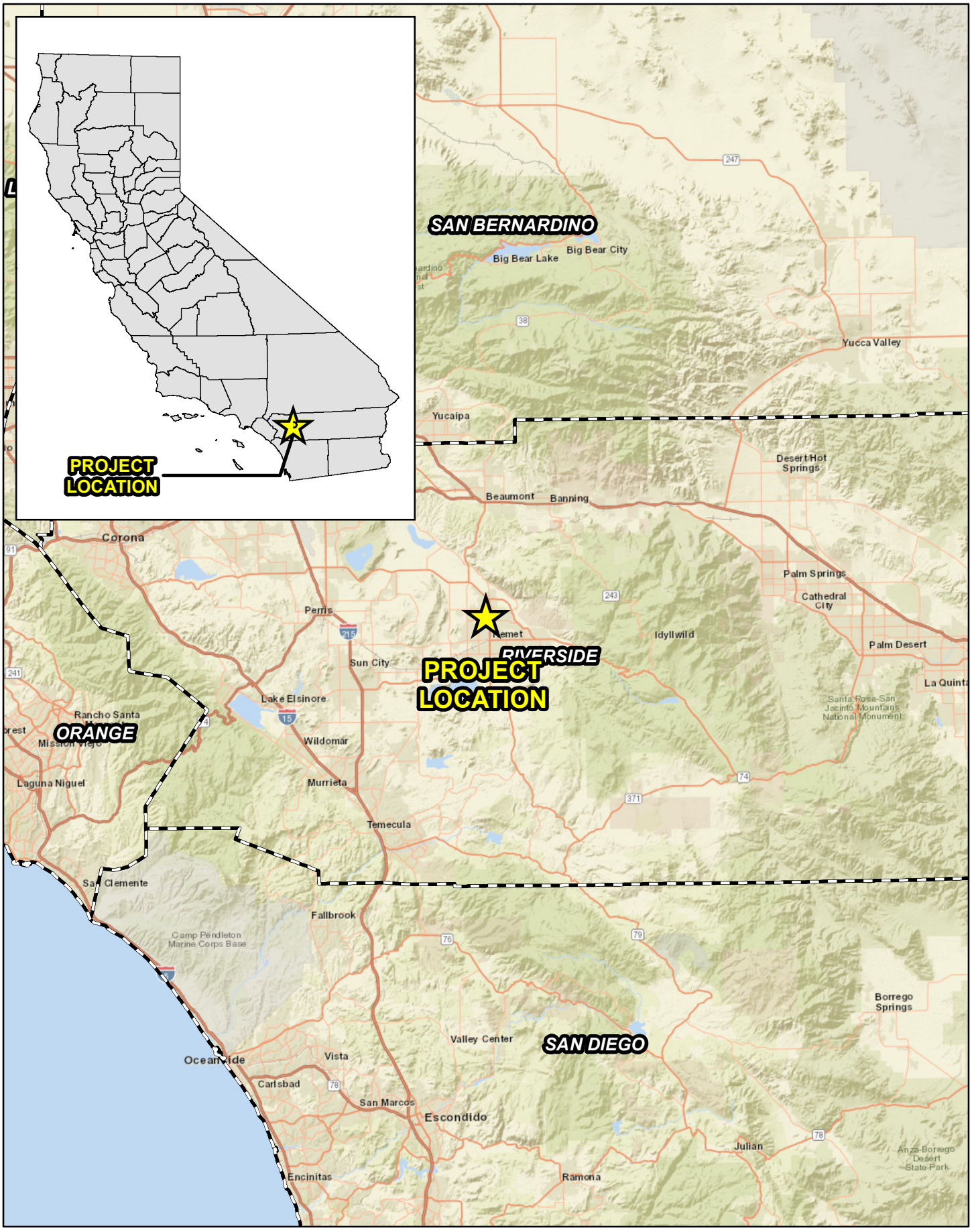
Travis J. McGill
Director

Attachments:

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

Attachment A

Project Exhibits



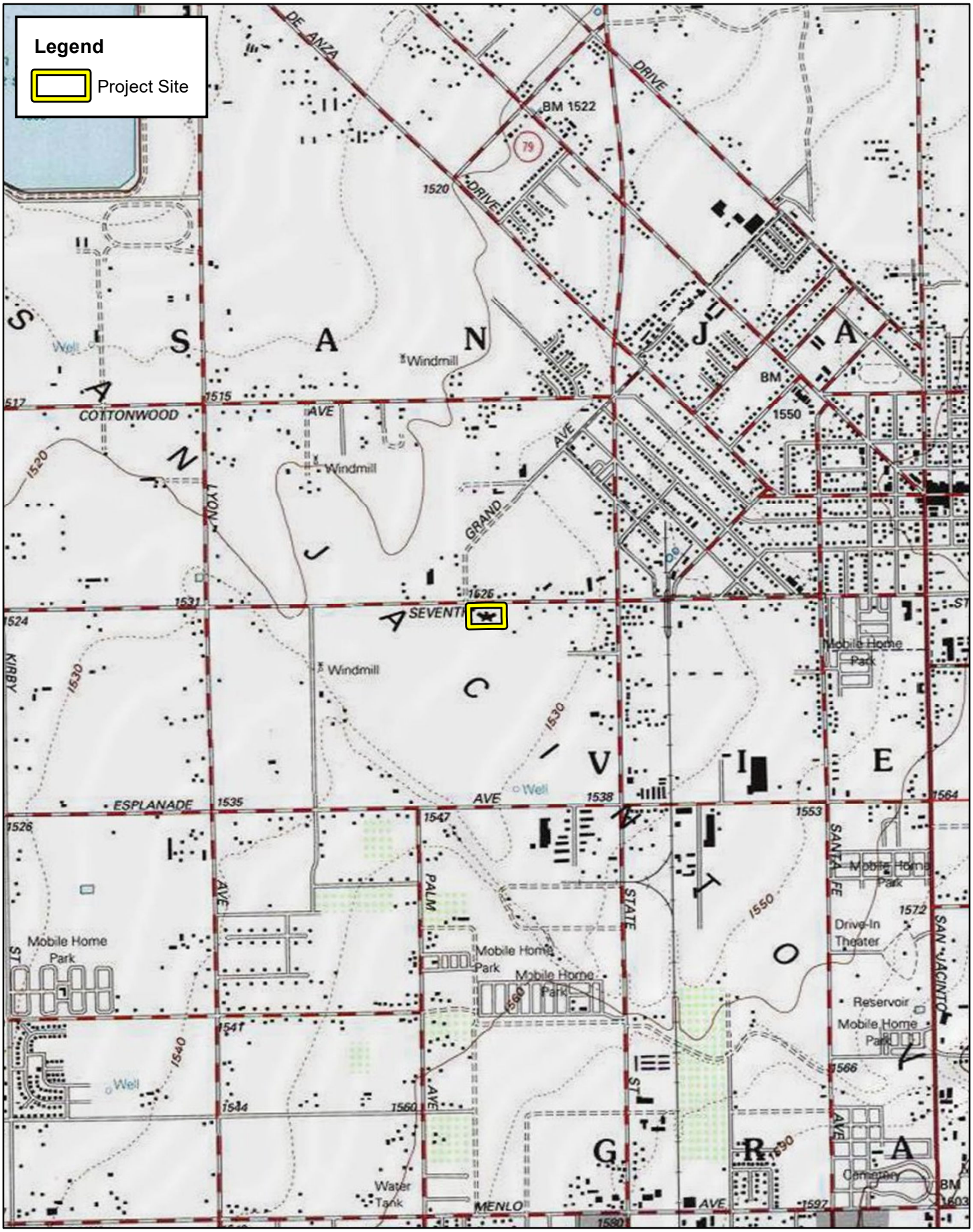
ELMT CONSULTING

Source: World Street Map, Riverside County

BRADLEY GARDENS

Regional Vicinity

Exhibit 1



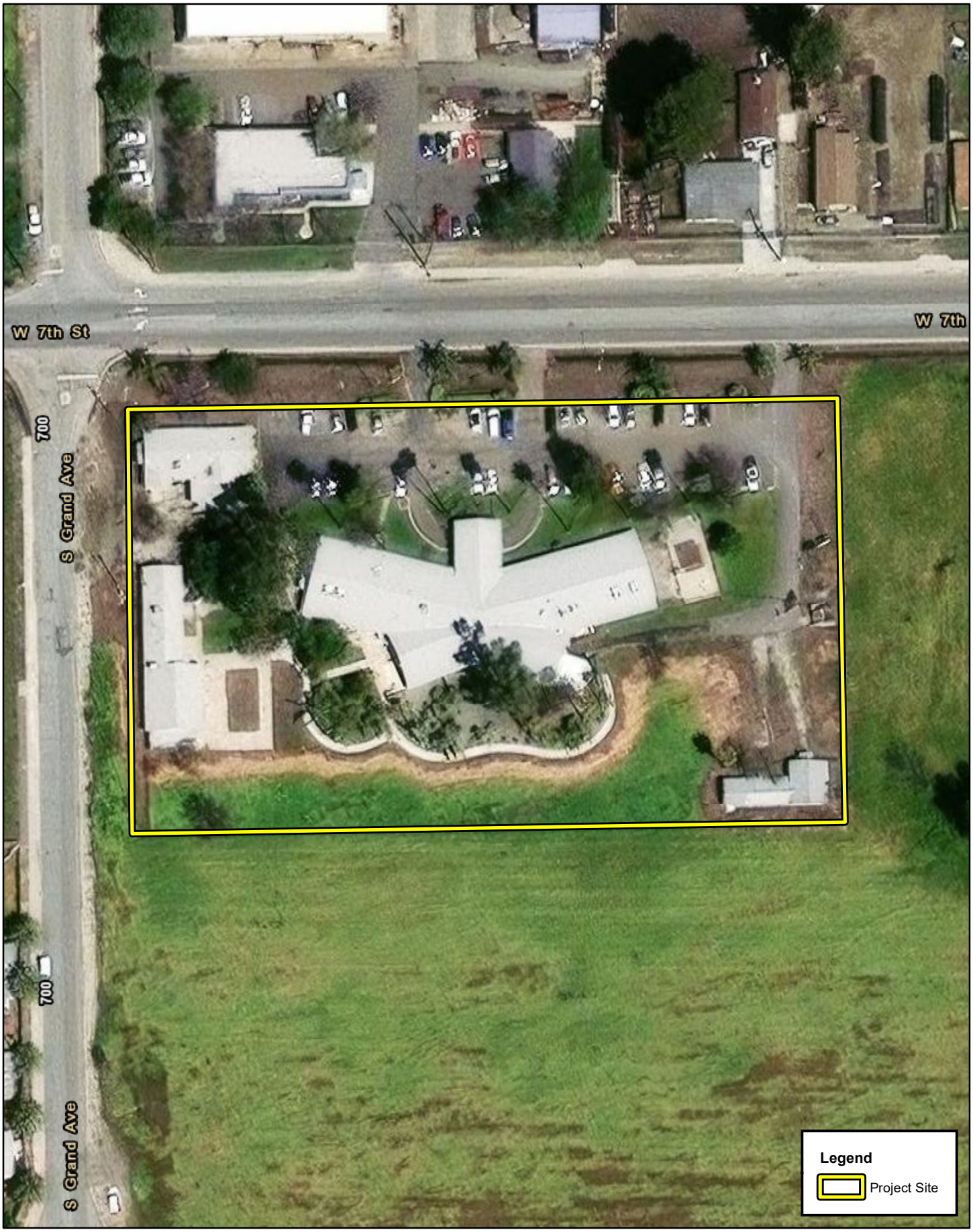
ELMT CONSULTING

Source: USA Topographic Map, Riverside County

BRADLEY GARDENS

Site Vicinity

Exhibit 2



ELMT CONSULTING

0 62.5 125 250 Feet

Source: ESRI Aerial Imagery, Riverside County

BRADLEY GARDENS

Project Site

Exhibit 3



ELMT CONSULTING

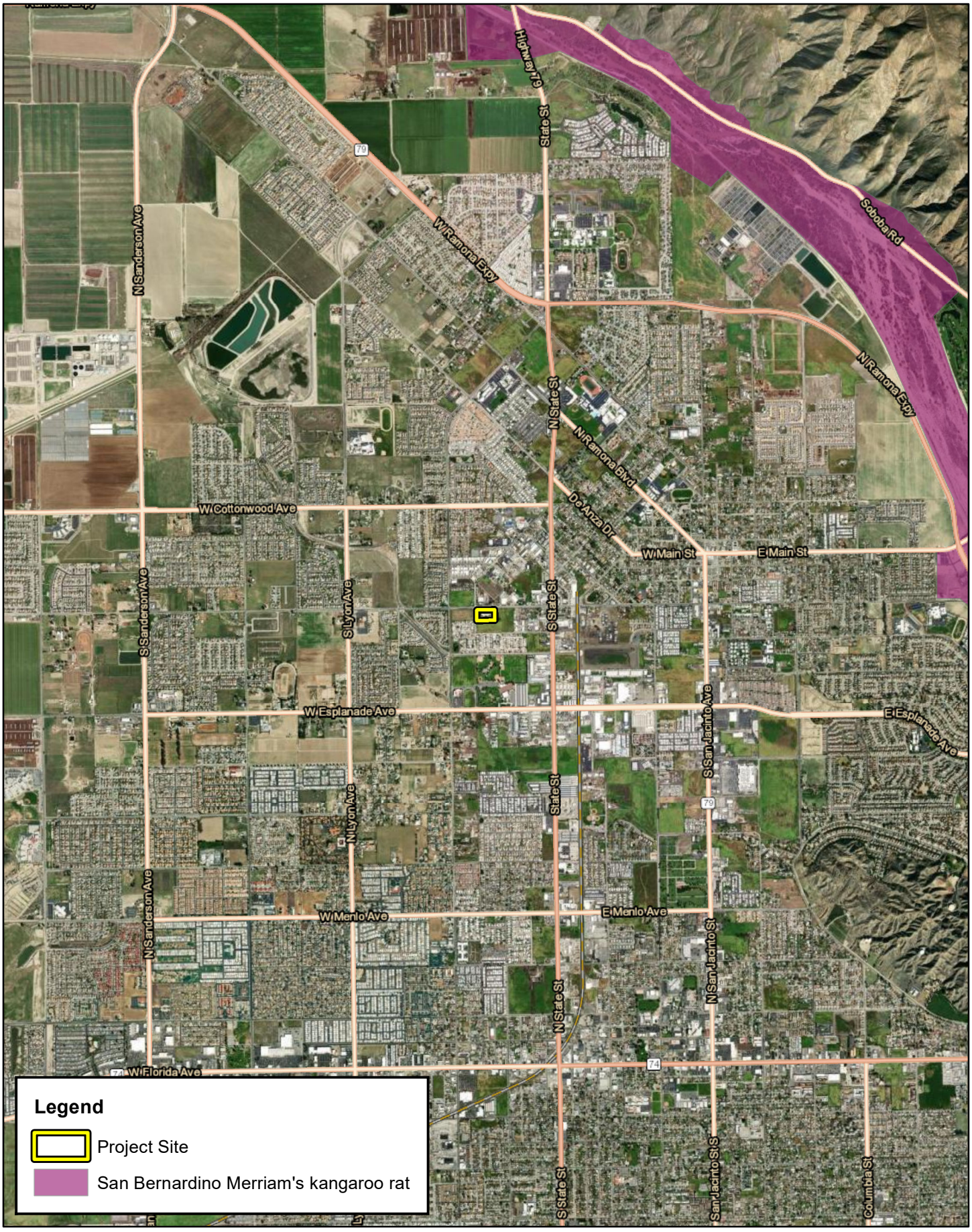
0 62.5 125 250 Feet

Source: ESRI Aerial Imagery, Riverside County

BRADLEY GARDENS

Vegetation

Exhibit 4



ELMT CONSULTING

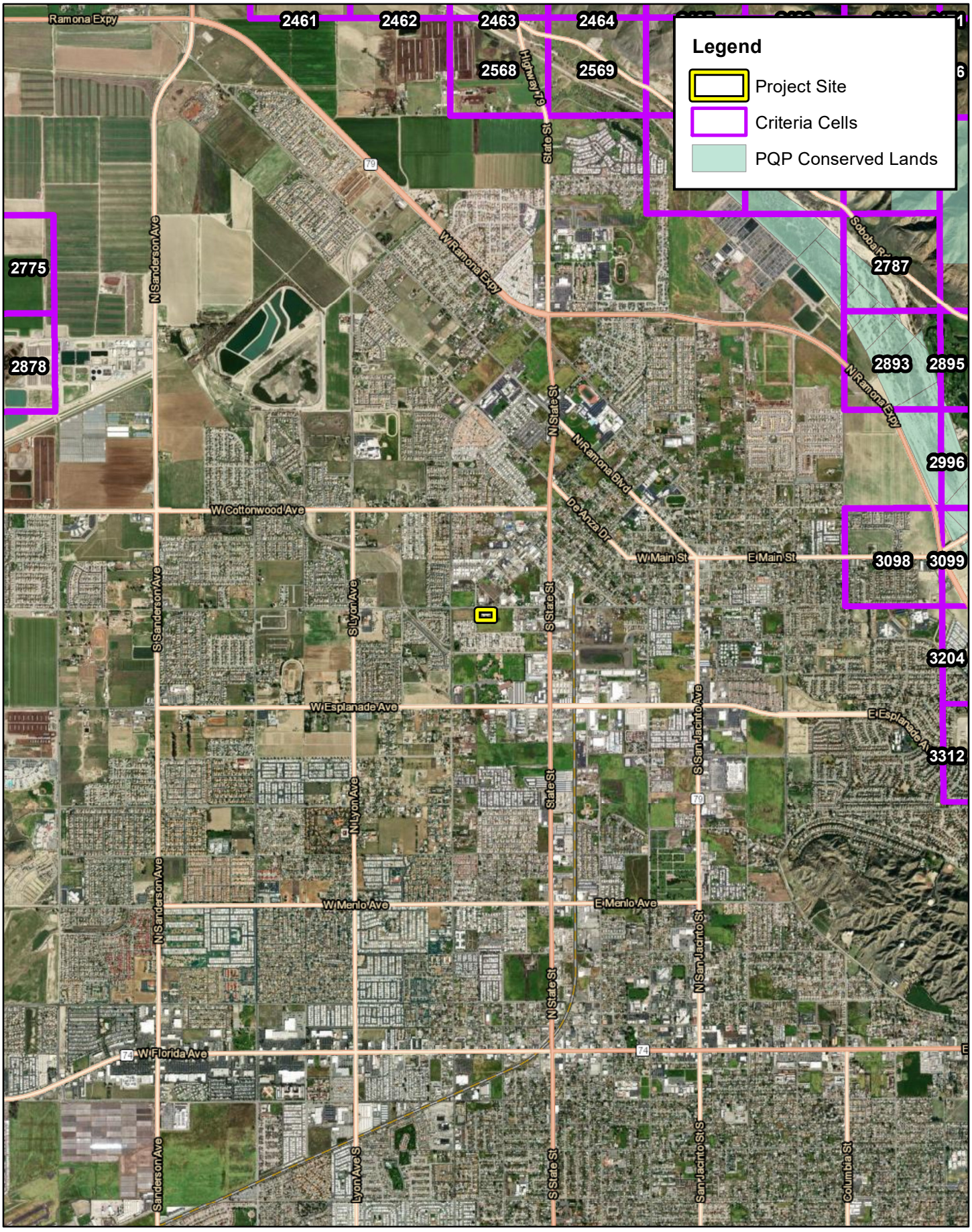
0 2,500 5,000 10,000 Feet

Source: ESRI Aerial Imagery, USFWS Critical Habitat, Riverside County

BRADLEY GARDENS

Critical Habitat

Exhibit 6



ELMT CONSULTING

0 2,500 5,000 10,000 Feet

Source: ESRI Aerial Imagery, Riverside County

BRADLEY GARDENS

MSHCP Criteria Area

Exhibit 6

Attachment B

Site Photographs



Photograph 1: From the east portion of the project site, looking south along the eastern boundary.



Photograph 2: From the east portion of the project site, looking north.



Photograph 3: From the southeast corner of the project site looking west.



Photograph 4: From the southeast corner of the project site looking north.



Photograph 5: From the center of the south boundary of the project site looking west.



Photograph 6: From the center of the south boundary of the project site looking east.



Photograph 7: From the southwest portion of the project site looking north.



Photograph 8: From the southwest portion of the project site looking east.



Photograph 9: From the northern portion of the project site looking east along a roadside ditch.

Attachment C

Potentially Occurring Special-Status Biological Resources

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

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
WILDLIFE SPECIES					
Accipiter striatus sharp-shinned hawk	**Fed:** None **CA:** WL	Generally found in cismontane woodland, lower montane coniferous forest, riparian forest, and riparian woodland. Associated with ponderosa pine, black oak, riparian deciduous, mixed conifer, and Jeffrey pine habitats, with a preference for riparian areas.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Agelaius tricolor tricolored blackbird	**Fed:** None **CA: THR** | SSC	Range is limited to the coastal areas of the Pacific coast of North America, from Northern California to upper Baja California. Can be found in a wide variety of habitat including annual grasslands, wet and dry vernal pools and other seasonal wetlands, agricultural fields, cattle feedlots, and dairies. Occasionally forage in riparian scrub habitats along marsh borders. Basic habitat requirements for breeding include open accessible water, protected nesting substrate (freshwater marsh dominated by cattails, willows, and bulrushes), and either flooded or thorny or spiny vegetation and suitable foraging space providing adequate insect prey.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Aimophila ruficeps canescens southern California rufous-crowned sparrow	**Fed:** None **CA:** WL	Typically found between 3,000 and 6,000 feet in elevation. Breeds in sparsely vegetated scrubland on hillsides and canyons. Prefers coastal sage scrub dominated by California sagebrush (Artemisia californica), but they can also be found breeding in coastal bluff scrub, low-growing serpentine chaparral, and along the edges of tall chaparral habitats.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Ammodramus savannarum grasshopper sparrow	**Fed:** None **CA:** SSC	Occurs in grassland, upland meadow, pasture, hayfield, and old field habitats. Optimal habitat contains short- to medium-height bunch grasses interspersed with patches of bare ground, a shallow litter layer, scattered forbs, and few shrubs. May inhabit thickets, weedy lawns, vegetated landfills, fence rows, open fields, or grasslands.	Yes (e)	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Anniella stebbinsi Southern California legless lizard	**Fed:** None **CA:** SSC	Occurs in sparsely vegetated habitat types including coastal sand dunes, chaparral, pine-oak woodland, desert scrub, open grassland, and riparian areas. Requires sandy or loose loamy substrates conducive to burrowing.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Antrozous pallidus pallid bat	**Fed:** None **CA:** SSC	Locally common species of low elevation in California. Mostly found in desert habitats, but also occur in oak and pine forested areas and open farmland. Prefers rocky outcrops for roosting, but also roost in caves, rock crevices, mines, hollow trees, and buildings. roosts with depth gradients are preferred.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Aquila chrysaetos golden eagle	**Fed:** None **CA:** FP | WL	Occurs in rolling foothill, sage-juniper flats, desert, and mountainous habitats. Requires open terrain for hunting including grasslands, deserts, savannahs, and early successional stages of forest and shrub habitats. Nests on cliffs and escarpments in rugged canyons and in large trees in open areas. Prefers rolling foothills, mountain terrain, cliffs, rock outcrops, and wide arid plateaus deeply cut by streams and canyons.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Ardea alba great egret	**Fed:** None **CA:** None	Generally found in brackish marsh estuary freshwater marsh & swamp riparian forest wetland. Rookery sites located near marshes, tide-flats, irrigated pastures, and margins of rivers and lakes.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Ardea herodias great blue heron	**Fed:** None **CA:** None	Generally found in brackish marsh estuary freshwater marsh & swamp riparian forest wetland. Colonial nester in tall trees, cliffsides, and sequestered spots on marshes. Rookery sites in close proximity to foraging areas: marshes, lake margins, tide-flats, rivers and streams, wet meadows.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Arizona elegans occidentalis California glossy snake	**Fed:** None **CA:** SSC	Inhabits arid scrub, rocky washes, grassland, and chaparral. Appears in microhabitats of open areas and areas with soil loose enough for easy burrowing.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Artemisiospiza belli belli Bells sparrow	**Fed:** None **CA:** WL	Generally prefers semi-open habitats with evenly spaced shrubs 1 – 2 meters in height. Dry chaparral dominated by chamise and/or California sagebrush, coastal sage scrub. Less common in tall, dense, old chaparral.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Asio flammeus short-eared owl	**Fed:** None **CA:** SSC	Generally found in Great Basin grassland, meadow and seep, marsh and swamp, and valley and foothill grassland wetlands. Occurs in lowland meadows.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Aspidoscelis hyperythra orange-throated whiptail	**Fed:** None **CA:** WL	Inhabits low-elevations coastal scrub, chamise-redshank chaparral, mixed chaparral, and valley-foothill hardwood habitats. Semi-arid brushy areas typically with loose soil and rocks, including washes, stream sides, rocky hillsides, and coastal chaparral.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Aspidoscelis tigris stejnegeri coastal whiptail	**Fed:** None **CA:** SSC	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas. Ground may be firm soil, sandy, or rocky.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Astur cooperii Coopers hawk	**Fed:** None **CA:** WL	Generally found in cismontane woodland riparian forest riparian woodland upper montane coniferous forest. Woodland, chiefly of open, interrupted or marginal type. Nests sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains. Also, live oaks.	No	No	**Low** Marginal foraging and habitat is present within and adjacent to the project site.
Athene cunicularia burrowing owl	**Fed:** None **CA:** Candidate Endangered | SSC	Prefers habitat with short, sparse vegetation with few shrubs and well-drained soils in grassland, shrub steppe, and desert habitats. Primarily a grassland species, but it persists and even thrives in some landscapes highly altered by human activity. Occurs in open, annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. The overriding characteristics of suitable habitat appear to be burrows for roosting and nesting and relatively short vegetation with only sparse shrubs and taller vegetation.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Aythya americana redhead	**Fed:** None **CA:** SSC	Occurs year round in California, though status varies regionally. Nests in freshwater emergent wetlands where dense stands of cattails and tules are interspersed with areas of deep, open water.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Bombus crotchii Crotchs bumble bee	**Fed:** None **CA:** Candidate Endangered	Colonial species that lives almost exclusively from coastal California east towards the Sierra-Cascade Crest and can be found uncommonly in western Nevada and south through Baja California. Inhabits grassland and scrub habitats in hotter and drier climates than most other bumblebee species and is only capable of tolerating a narrow range of climatic conditions. This species usually nests underground, often in abandoned rodent dens.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Bombus pensylvanicus American bumble bee	**Fed:** None **CA:** None	Generally found in coastal prairie Great Basin grassland valley & foothill grassland.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Botaurus exilis least bittern	**Fed:** None **CA:** SSC	Generally found in marsh & swamp wetland. Colonial nester in marshlands and borders of ponds and reservoirs which provide ample cover.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Botaurus lentiginosus American bittern	**Fed:** None **CA:** None	Generally found in brackish marsh freshwater marsh salt marsh. Freshwater and slightly brackish marshes. Also in coastal saltmarshes.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Buteo regalis ferruginous hawk	**Fed:** None **CA:** WL	Common winter resident of grasslands and agricultural areas in southwestern California. Frequents open grasslands, sagebrush flats, desert scrub, low foothills surrounding valleys, and fringes of pinyon-juniper habitats. Does not breed in California.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Buteo swainsoni Swainsons hawk	**Fed:** None **CA: THR**	Typical habitat is open desert, grassland, or cropland containing scattered, large trees or small groves. Breeds in stands with few trees in juniper-sage flats, riparian areas, and in oak savannah in the Central Valley. Forages in adjacent grassland or suitable grain or alfalfa fields or livestock pastures.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Calypte costae Costas hummingbird	**Fed:** None **CA:** None	Typical habitat is open desert, grassland, or cropland containing scattered, large trees or small groves. Breeds in stands with few trees in juniper-sage flats, riparian areas, and in oak savannah in the Central Valley. Forages in adjacent grassland or suitable grain or alfalfa fields or livestock pastures.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Chaetodipus californicus femoralis Dulzura pocket mouse	**Fed:** None **CA:** None	Occurs in desert and coastal habitats in southern California, Mexico, and northern Baja California, from sea level to at least 1,400 meters. Found in a variety of temperate habitats ranging from chaparral and grasslands to scrub forests and deserts. Requires low growing vegetation or rocky outcroppings, as well as sandy soils for burrowing.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Chaetodipus fallax fallax northwestern San Diego pocket mouse	**Fed:** None **CA:** None	Occurs in desert and coastal habitats in southern California, Mexico, and northern Baja California, from sea level to at least 4,600 feet in elevation. Found in a variety of temperate habitats ranging from chaparral and grasslands to scrub forests and deserts. Requires low growing vegetation or rocky outcroppings, as well as sandy soils for burrowing.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Chlidonias niger black tern	**Fed:** None **CA:** SSC	Found at freshwater marshes and lakes and found along coastal waters in migration. For nesting favors fresh waters with extensive marsh vegetation and open water, also sometimes in smaller marshes and wet meadows. In migration found on larger lakes and along coast. Winters in tropical coastal regions, mostly just offshore or around salt lagoons and estuaries.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Circus hudsonius northern harrier	**Fed:** None **CA:** SSC	Most common in large, undisturbed tracts of wetlands and grasslands with low, thick vegetation. They breed in freshwater and brackish marshes, lightly grazed meadows, old fields, tundra, dry upland prairies, drained marshlands, high-desert shrubsteppe, and riverside woodlands. During winter they use a range of habitats with low vegetation, including deserts, coastal sand dunes, pasturelands, croplands, dry plains, grasslands, old fields, estuaries, open floodplains, and marshes.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Coccyzus americanus occidentalis western yellow-billed cuckoo	**Fed: THR** **CA: END**	In California, the breeding distribution is now thought to be restricted to isolated sites in Sacramento, Amargosa, Kern, Santa Ana, and Colorado River valleys. Obligate riparian species with a primary habitat association of willow-cottonwood riparian forest.	Yes (a)	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Coleonyx variegatus abbotti San Diego banded gecko	**Fed:** None **CA:** SSC	Found in southwestern California just inland from the Pacific coast, from Ventura County south into northwestern and central Baja California. It is found in coastal scrub chaparral and desert scrub habitats, preferring granite or rocky outcrops.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Corynorhinus townsendii Townsends big-eared bat	**Fed:** None **CA:** SSC	Occupies a variety of habitats including desert scrub, chaparral, oak woodland, and coniferous forest. Roosts in caves, mines, rock crevices, and abandoned buildings, typically selecting sites with minimal disturbance and stable temperatures. Forages in open habitats and along forest edges, relying on a high degree of roost site fidelity.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Crotalus ruber red-diamond rattlesnake	**Fed:** None **CA:** SSC	Found from desert dense chaparral communities in the foothills (it avoids the mountains above around 4,000 feet), to warm inland mesas and valleys, all the way to the cool ocean shore. Most commonly associated with heavy brush and large rocks or boulders. Dense chaparral in the foothills, cactus or boulder associated coastal sage scrub, oak and pine woodlands, and desert slope scrub associations are known to carry populations of the northern red-diamond rattlesnake. however, chamise and red shank associations may offer better structural habitat for refuges and food resources for this species than other habitats.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Dendrocygna bicolor fulvous whistling-duck	**Fed:** None **CA:** SSC	Generally found in freshwater marsh and swamp habitats, including freshwater and tule/cattail marshes.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Dipodomys merriami parvus San Bernardino kangaroo rat	**Fed: END** **CA: END** | SSC	Primarily found in Riversidean alluvial fan sage scrub (RAFSS) and sandy loam soils, alluvial fans and flood plains, and along washes with nearby sage scrub. May also occur at lower densities in Riversidean upland sage scrub, chaparral and grassland in uplands and tributaries in proximity to RAFSS habitat. Tends to avoid rocky substrates.	Yes (c)	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Dipodomys simulans Dulzura kangaroo rat	**Fed:** None **CA:** None	Relatively common in chaparral, coastal sage scrub, Riversidean alluvial fan sage scrub, and peninsular juniper woodland habitats with sandy and gravelly soils. Sometimes found in forests of pine, oak and fir.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Dipodomys stephensi Stephens kangaroo rat	**Fed: THR** **CA: THR**	Generally found in coastal scrub valley & foothill grassland. Primarily annual and perennial grasslands, but also occurs in coastal scrub and sagebrush with sparse canopy cover. Will burrow into firm soil.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Elanus leucurus white-tailed kite	**Fed:** None **CA:** FP	Common in savannahs, open woodlands, marshes, desert grasslands, partially cleared areas, and cultivated fields. Avoids heavily grazed areas. Breeds in lowland grasslands, agricultural wetlands, oak-woodland and savannah habitats, and riparian areas.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Empidonax traillii willow flycatcher	**Fed:** None **CA: END**	A rare to locally uncommon, summer resident in wet meadow and montane riparian habitats (2,000 to 8,000 ft) in the Sierra Nevada and Cascade Range. Most often occurs in broad, open river valleys or large mountain meadows with lush growth of shrubby willows.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Empidonax traillii extimus southwestern willow flycatcher	**Fed: END** **CA: END**	Uncommon summer resident of southern California. Occurs in riparian woodlands in southern California. Typically requires large areas of willow thickets in broad valleys, canyon bottoms, or around ponds and lakes. These areas typically have standing or running water, or are at least moist.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Eremophila alpestris actia California horned lark	**Fed:** None **CA:** WL	Occurs in meadows, grasslands, open fields, prairie, and alkali flats. This subspecies is typically found in coastal regions.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Euphydryas editha quino quino checkerspot butterfly	**Fed: END** **CA:** Candidate Endangered	Can be found in meadows and upland sage scrub/chaparral habitat.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Falco columbarius merlin	**Fed:** None **CA:** WL	Found in treetops, low perches at forest edges, grasslands, and saltmarshes. Also found in fairly open country such as willow or birch scrub, shrubland, taiga forests, parks, grasslands, steppes, and prairies. Winters in open forests, grasslands, and coastal areas.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Falco mexicanus prairie falcon	**Fed:** None **CA:** WL	Distributed from annual grasslands to alpine meadows, but primarily associated with grasslands, savannahs, rangeland, agricultural fields, and desert scrub areas. Requires open terrains for foraging and nests on cliffs, escarpments, and rock outcrops.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Falco peregrinus anatum American peregrine falcon	**Fed:** Delisted **CA:** Delisted	Uncommon winter resident of the inland region of southern California. Active nesting sites are known along the coast north of Santa Barbara, in Orange County, in the Sierra Nevada, and in other mountains of northern California. Breeds mostly in woodland, forest, and coastal habitats. Riparian areas and coastal and inland wetlands are important habitats yearlong, especially in nonbreeding seasons.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Gila orcuttii arroyo chub	**Fed:** None **CA:** SSC	Generally found in aquatic habitats of the south coast's flowing waters. Native to streams from Malibu Creek to the San Luis Rey River basin. Introduced into streams in the Santa Clara, Ventura, Santa Ynez, Mojave, and San Diego River basins. Occurs in slow-moving stream sections with mud or sand bottoms.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Haliaeetus leucocephalus bald eagle	**Fed:** Delisted **CA: END** | FP	Generally found in lower montane coniferous forest Oldgrowth. Ocean shore, lake margins, and rivers for both nesting and wintering. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Icteria virens yellow-breasted chat	**Fed:** None **CA:** SSC	Lives in thickets and along other dense, regrowing areas such as bramble bushes, clearcut areas, powerline corridors, and shrubs along streams. Can sometimes be found in overgrown pastures and in margins of woodlands. Winters in open scrub and woodland edges in lowland areas.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Lanius ludovicianus loggerhead shrike	**Fed:** None **CA:** SSC	Prefers open habitats with bare ground, scattered shrubs, and areas with low or sparse herbaceous cover including open-canopied valley foothill hardwood, riparian, pinyon-juniper, desert riparian, creosote bush scrub, and Joshua tree woodland. Requires suitable perches including trees, posts, fences, utility lines, or other perches.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Lasiurus xanthinus western yellow bat	**Fed:** None **CA:** SSC	Most commonly found in riparian woodland habitats consisting of sycamore, cottonwood and oak. Can also be found in desert environments and are closely associated with palms.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Lepus californicus bennettii San Diego black-tailed jackrabbit	**Fed:** None **CA:** None	Found in diverse habitats, but primarily is found in arid regions supporting shortgrass habitats. Openness of open scrub habitat is preferred over dense chaparral. Known to occur on the coastal side of mountain ranges westward from Los Padres National forest into Baja California.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Melanerpes lewis Lewis woodpecker	**Fed:** None **CA:** None	Breeds in open forest and woodland with an open canopy and brushy understory.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Nannopterum auritum double-crested cormorant	**Fed:** None **CA:** WL	Fairly common, yearlong resident in lowlands and foothills throughout most of California, including the Salton Sea and Colorado River areas, and very common locally in large nesting colonies. Feeds along the margins of lacustrine, large riverine, and fresh and saline emergent habitats and rarely, on kelp beds in marine sub tidal habitats. Nests and roosts in dense-foliaged trees and dense emergent wetlands.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Neotoma lepida intermedia San Diego desert woodrat	**Fed:** None **CA:** SSC	Found in a variety of shrub and desert habitats. Prefers large cactus patches and rock outcroppings. Common in sagebrush scrub areas, chaparral, desert, and within rocky sloped areas. Occurs at elevations up to 9,500 feet.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Nycticorax nycticorax black-crowned night heron	**Fed:** None **CA:** None	Fairly common, yearlong resident in lowlands and foothills throughout most of California, including the Salton Sea and Colorado River areas, and very common locally in large nesting colonies. Feeds along the margins of lacustrine, large riverine, and fresh and saline emergent habitats and rarely, on kelp beds in marine sub tidal habitats. Nests and roosts in dense-foliaged trees and dense emergent wetlands.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Onychomys torridus ramona southern grasshopper mouse	**Fed:** None **CA:** SSC	Inhabits alkali desert scrub and other desert scrub habitats, and to a lesser extent succulent shrubs, desert washes, desert riparian, coastal scrub, mixed chaparral, and sagebrush habitats. Generally rare in valley foothill and montane riparian habitats. Prefers low to moderate shrub cover and requires friable soils. In California, range extends from Los Angeles southward to the Mexican border, generally west of the desert.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Perognathus longimembris brevinasus Los Angeles pocket mouse	**Fed:** None **CA:** SSC	Generally found in coastal scrub. Lower elevation grasslands and coastal sage communities in and around the Los Angeles basin. Open ground with fine, sandy soils.	Yes (c)	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Phrynosoma blainvillii coast horned lizard	**Fed:** None **CA:** SSC	Found in a wide variety of vegetation types including coastal sage scrub, annual grassland, chaparral, oak woodland, riparian woodland and coniferous forest. The key elements of such habitats are loose, fine soils with a high sand fraction. an abundance of native ants or other insects. and open areas with limited overstory for basking and low, but relatively dense shrubs for refuge.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Plegadis chihi white-faced ibis	**Fed:** None **CA:** WL	Prefers to feed in fresh emergent wetland, shallow lacustrine waters, muddy ground of wet meadows, and irrigated or flooded pastures and croplands. Roosts amidst dense, freshwater emergent vegetation such as bulrushes, cattails, reeds or low shrubs over water.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Polioptila californica californica coastal California gnatcatcher	**Fed: THR** **CA:** SSC	Common yearlong resident of southern California in sage scrub habitats that are dominated by California sagebrush (Artemisia californica). Prefers scrub habitat with more low-growing vegetation. Species generally occurs below 750 feet above mean sea level (msl) along the coast and below 1,500 feet above msl within inland regions.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Pyrocephalus rubinus vermilion flycatcher	**Fed:** None **CA:** SSC	Found in any open country in the Southwest, including arid scrublands, farmlands, deserts, parks, and canyon mouths. Sometimes winters along the coastlines. Reliant on stream corridors within scrub ecosystems, in areas where willow, sycamore, cottonwood, mesquite, and other bottomland trees grow. Nests along stream corridors.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Salvadora hexalepis virgultea coast patch-nosed snake	**Fed:** None **CA:** SSC	Found in desert scrub, grassland chaparral, sagebrush plains, and pinyon-juniper woodlands in the southwestern United States south into Baja California and Mexico. Occurs from below sea level to 7,000 feet in elevation.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Setophaga petechia yellow warbler	**Fed:** None **CA:** SSC	Nests over all of California except the Central Valley, the Mojave Desert region, and high altitudes and the eastern side of the Sierra Nevada. Winters along the Colorado River and in parts of Imperial and Riverside Counties. Nests in riparian areas dominated by willows, cottonwoods, sycamores, or alders or in mature chaparral. May also use oaks, conifers, and urban areas near stream courses.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Spea hammondii western spadefoot	**Fed: PTHR** **CA:** SSC	Prefers open areas with sandy or gravelly soils in a variety of habitats, including mixed woodlands, grasslands, coastal sage scrub, chaparral, sandy washes, lowlands, river floodplains, alluvial fans, playas, alkali flats, foothills, and mountains. Rain pools that do not contain bullfrogs, fish, or crayfish are necessary for breeding.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Spinus lawrencei Lawrences goldfinch	**Fed:** None **CA:** None	Typical habitats include valley foothill hardwood, valley foothill hardwood-conifer, and, in southern California, desert riparian, palm oasis, pinyon-juniper, and lower montane habitats. Open woodlands, chaparral, and weedy fields. Closely associated with oaks. Nests in open oak or other arid woodland and chaparral near water.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Spizella breweri Brewers sparrow	**Fed:** None **CA:** None	Live in shrublands year-round. Most often found in sagebrush shrublands with short vegetation in spring and summer. May also occur in openings in pinyon-juniper woodlands or in other mountain shrub communities. Typically nest in taller, denser shrubs with less bare ground. Common in desert shrublands dominated by saltbush shrubs and creosote.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Taxidea taxus American badger	**Fed:** None **CA:** SSC	Primarily occupy grasslands, parklands, farms, tallgrass and shortgrass prairies, meadows, shrub-steppe communities and other treeless areas with sandy loam soils where it can dig more easily for its prey. Occasionally found in open chaparral (with less than 50% plant cover) and riparian zones.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Thamnophis hammondii two-striped gartersnake	**Fed:** None **CA:** SSC	Inhabits streams and ponds in chaparral, oak woodland, and forest habitats up to 8,000 feet elevation. Semi-aquatic in nature, but can occur in a variety of habitats-including urban areas-where there is water present.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Vireo bellii pusillus least Bells vireo	**Fed: END** **CA: END**	Primarily occupy Riverine riparian habitat that typically feature dense cover within 1 -2 meters of the ground and a dense, stratified canopy. Typically it is associated with southern willow scrub, cottonwood-willow forest, mule fat scrub, sycamore alluvial woodlands, coast live oak riparian forest, arroyo willow riparian forest, or mesquite in desert localities. It uses habitat which is limited to the immediate vicinity of water courses, 2,000 feet elevation in the interior.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Xanthocephalus xanthocephalus yellow-headed blackbird	**Fed:** None **CA:** SSC	Summers in the west-central United States and Canada and winters throughout the western United States. Nests primarily in large wetlands, but also in mountain meadows and along pond and river edges. Breeds in freshwater sloughs, marshy lake borders, and tall cattails.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
PLANT SPECIES					

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Abronia villosa var. aurita chaparral sand-verbena	**Fed:** None **CA:** None **CNPS:** 1B.1	Found on the coastal side of the southern California mountains in chaparral, coastal sage scrub, and desert dune plant communities in areas of full sun and sandy soils. Found at elevations ranging from 262 to 5,249 feet. Blooming period is from January to September.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Allium marvinii Yucaipa onion	**Fed:** None **CA:** None **CNPS:** 1B.2	Found in chaparral, cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland. Found at elevations ranging from 974 to 3,510 feet. Blooming period is from March to May.	Yes (b)	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Astragalus pachypus var. jaegeri Jaegers milk-vetch	**Fed:** None **CA:** None **CNPS:** 1B.1	Found in only a few places in Riverside County and within the Cleveland and San Bernadino National Forests. Grows in rocky (sometimes), sandy (sometimes) areas within chaparral, cismontane woodland, coastal scrub, and valley and foothill grassland habitats. Found at elevations ranging from 1,200 to 3,200 feet. Blooming period is from December to June.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Calochortus plummerae Plummers mariposa-lily	**Fed:** None **CA:** None **CNPS:** 4.2	Found along the coast and inland hills in chaparral, coastal sage scrub, yellow pine forest, foothill woodland, and valley grassland plant communities. Prefers dry, rocky soils. Grows at elevations of up to 5,580 feet. Blooms from May to July.	Yes (e)	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Caulanthus simulans Paysons jewelflower	**Fed:** None **CA:** None **CNPS:** 4.2	Occurs in pinyon-juniper woodland, chaparral, and coastal sage scrub, typically on north-facing slopes and ridgelines on sandy-granitic soils. Grows in elevations ranging from 295 to 7,220 feet above msl. Blooming period is from March to May.	Yes	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Centromadia pungens ssp. laevis smooth tarplant	**Fed:** None **CA:** None **CNPS:** 1B.1	Occurs in alkaline soils within chenopod scrub, meadows and seeps, playas, riparian woodland, and valley and foothill grassland habitats. Grows in elevation ranging from 0 to 2,100 feet. Blooming period ranges from April to September.	Yes (d)	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Chorizanthe leptotheca Peninsular spineflower	**Fed:** None **CA:** None **CNPS:** 4.2	Endemic to southern California, primarily in the Peninsular Ranges including parts of San Bernardino, Riverside, and San Diego counties. Found in chaparral, cismontane woodland, and coastal scrub habitats, typically on granitic or sandy soils. Elevation range is approximately 1,000 to 6,200 feet. Blooms from May to August.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Chorizanthe parryi var. parryi Parrys spineflower	**Fed:** None **CA:** None **CNPS:** 1B.1	Openings within alluvial washes and margins on sandy (sometimes), rocky (sometimes) soils within chaparral, cismontane woodland, coastal scrub, and valley and foothill grasslands. Found at elevations ranging from 951 to 3,773 feet. Blooming period is from April to June.	Yes (e)	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Deinandra mohavensis Mojave tarplant	**Fed:** None **CA: END** **CNPS:** 1B.3	Found in the southernmost areas of the Sierra Nevada Mountains, the Mojave Desert, the Peninsular Ranges, and the San Bernadino Mountains. Grows in mesic areas in chaparral, coastal scrub, and riparian scrub habitats. Found at elevations ranging from 2,100 to 5,250 feet. Blooms from June to October.	Yes (e)	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Imperata brevifolia California satintail	**Fed:** None **CA:** None **CNPS:** 2B.1	Grows in mesic soils within coastal scrub, Mojavean desert scrub, meadows and seeps (often alkali), and riparian scrub habitats. found at elevations ranging from 0 to 3,986 feet. Blooming period is from September to May.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Pseudognaphalium leucocephalum white rabbit-tobacco	**Fed:** None **CA:** None **CNPS:** 2B.2	Grows in sandy, gravelly soils within chaparral, cismontane woodland, coastal scrub, and riparian woodland habitats. Found at elevations ranging from 0 to 6,890 feet. Blooming period is from July to December.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
Quercus engelmannii Engelmann oak	**Fed:** None **CA:** None **CNPS:** 4.2	Occurs in chaparral, cismontane woodland, riparian woodland, and valley and foothill grassland. Found at elevations ranging from 164 to 4,265 feet. Blooming period is from March to June.	No	No	**Presumed Absent** There is no suitable habitat present within or adjacent to the project site.
CDFW SENSITIVE HABITATS					
Desert Fan Palm Oasis Woodland	CDFW Sensitive Habitat	Occurs in riparian woodland.	No	No	**Absent**
Southern Coast Live Oak Riparian Forest	CDFW Sensitive Habitat	Open-to-dense canopy woodland dominated by coast live oak (Quercus agrifolia), as well as western sycamore (Platanus racemosa) and willow (Salix spp.). This habitat is found in flood-prone areas near waterways like rivers and creeks. Understory is comprised of moisture-loving plants.	No	No	**Absent**

Scientific Name Common Name	**Status**	**Habitat**	**Covered by MSHCP**	**Observed On-site**	**Potential to Occur**
Southern Cottonwood Willow Riparian Forest	CDFW Sensitive Habitat	Dominated by winter-deciduous trees, specifically Fremont cottonwood (Populus fremontii) and several species of willow (Salix sp.). These forests are characterized by a tall, multi-layered canopy and often have a dense understory of shrubs and herbaceous plants. They are found along rivers, streams, and other bodies of water, typically in areas with moist, bare mineral soil.	No	No	**Absent**
Southern Mixed Riparian Forest	CDFW Sensitive Habitat	Typically a younger successional stage of riparian forest, due to disturbance or more frequent flooding. Plant species include willow (Salix sp.) species, elderberry (Sambucus sp.), oak species, sycamore (Platanus racemosa), cottonwood (Populus sp.), and smaller shrubs.	No	No	**Absent**

U.S. Fish and Wildlife Service (Fed) - Federal
END- Federal Endangered
THR- Federal Threatened

California Department of Fish and Wildlife (CA) - California
END- California Endangered
THR- California Threatened
Candidate- Candidate for listing under the California Endangered Species Act
FP- California Fully Protected
SSC- Species of Special Concern
WL- Watch List

California Native Plant Society (CNPS)
California Rare Plant Rank
1B Plants Rare, Threatened, or Endangered in California and Elsewhere
2B Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
3 Plants About Which More Information is Needed – A Review List
4 Plants of Limited Distribution – A Watch List

CNPS Threat Ranks
0.1- Seriously threatened in California
0.2- Moderately threatened in California
0.3- Not very threatened in California

Western Riverside County MSHCP
Yes- Fully covered
No- Not covered
Yes (a)- May require surveys under MSHCP Section 6.1.2
Yes (b)- May require surveys under MSHCP Section 6.1.3
Yes (c)- May require surveys under MSHCP Section 6.3.2
Yes (d)- May require surveys under MSHCP Section 6.3.2
Yes (e)- Conditionally covered pending the achievement of species-specific conservation measures

Attachment D

Regulations

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

Federal Regulations

Endangered Species Act of 1973

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

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

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

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

Migratory Bird Treaty Act

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

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

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

State Regulations

California Environmental Quality Act (CEQA)

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

California Endangered Species Act (CESA)

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

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

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

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

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

Fish and Game Code

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

Native Plant Protection Act

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

California Native Plant Society Rare and Endangered Plant Species

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

California Rare Plant Rank

1A- Plants Presumed Extirpated in California and either Rare or Extinct Elsewhere

1B- Plants Rare, Threatened, or Endangered in California and Elsewhere

2A- Plants Presumed Extirpated in California, But More Common Elsewhere

2B- Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere

3- Plants about Which More Information is Needed - A Review List

4- Plants of Limited Distribution - A Watch List

Threat Ranks

.1- Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2- Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

.3- Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known).

Local Policies

Western Riverside County MSHCP

The MSHCP is a comprehensive, multi-jurisdictional HCP focusing on conservation of species and their associated habitats in western Riverside County. The goal of the MSHCP is to maintain biological and ecological diversity within a rapidly urbanizing region.

The approval of the MSHCP and execution of the Implementing Agreement (IA) by the wildlife agencies allows signatories of the IA to issue "take" authorizations for all species covered by the MSHCP, including state- and federal-listed species as well as other identified sensitive species and/or their habitats. Each city or local jurisdiction will impose a Development Mitigation Fee for projects within their jurisdiction. With payment of the mitigation fee to the County and compliance with the survey requirements of the MSHCP where required, full mitigation in compliance with the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), CESA, and FESA will be granted. The Development Mitigation Fee varies according to project size and project description. The fee for industrial development is $7,382 per acre (County Ordinance 810.2). Payment of the mitigation fee and compliance with the requirements of Section 6.0 of the MSHCP are intended to provide full mitigation under CEQA, NEPA, CESA, and FESA for impacts to the species and habitats covered by the MSHCP pursuant to agreements with the USFWS, the CDFW, and/or any other appropriate participating regulatory agencies and as set forth in the IA for the MSHCP.

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

Federal Regulations

Section 404 of the Clean Water Act

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

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

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

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

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

(4) Wetlands adjacent to the following waters:
(i) Waters identified in paragraph (a)(1) of this section; or
(ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;

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

(b) The following are not "waters of the United States" even where they otherwise meet the terms of paragraphs (a)(2) through (5) of this section:

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

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

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

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

(4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;
(5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;
(6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;

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

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

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

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

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

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

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

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

Section 401 of the Clean Water Act

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

State Regulations

Fish and Game Code

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

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

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

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

Porter Cologne Act

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

Attachment E

Site Plan

SITE INFORMATION:

APN(S):	435-330-003
PARCEL GROSS AREA:	±164,000 S.F. (3.765 ACRES)
PARCEL NET AREA:	±127,846 S.F. (2.935 ACRES)
ZONING:	INDUSTRIAL LIGHT (IL)
SITE ADDRESS:	980 W. 7TH STREET SAN JACINTO, CA 92582
FAR:	±34,518 S.F. = 27% (MAX FAR - 50%)
LANDSCAPED AREA:	±30,683 S.F. = 24%
IMPERVIOUS SURFACE AREA:	±97,163 S.F. = 76% (MAX AREA - 80%)

EXISTING BUILDING A - SNF DATA:

EXISTING USE:	SKILLED NURSING FACILITY
OCCUPANCY:	I-2 (W/ CONTROLLED EGRESS)
CONSTRUCTION TYPE:	V-A
FIRE SPRINKLERED:	YES
STORIES:	1
AREA:	±12,132 S.F.
EXISTING LICENSED BEDS:	44 BEDS

PROPOSED BUILDING A1 (ADDITION) - 43-BED SNF-STP DATA:

PROPOSED USE:	SKILLED NURSING FACILITY
OCCUPANCY:	I-2 (W/ CONTROLLED EGRESS)
CONSTRUCTION TYPE:	V-A
FIRE SPRINKLERED:	YES
STORIES:	1
AREA:	±17,372 S.F.
PROPOSED LICENSED BEDS:	43 BEDS (TOTAL OF 87 BEDS)

EXISTING OFFICE BUILDING B DATA:

EXISTING USE:	AUXILLARY TO SKILLED NURSING FACILITY
OCCUPANCY:	B
CONSTRUCTION TYPE:	V-B
FIRE SPRINKLERED:	NO
STORIES:	1
AREA:	±2,609 S.F.

PROPOSED BUILDING C - 16-BED PHF DATA :

EXISTING USE:	MEDICAL OFFICE
PROPOSED USE:	PSYCHIATRIC HEALTH FACILITY (PHF)
OCCUPANCY:	I-2 (W/ CONTROLLED EGRESS)
CONSTRUCTION TYPE:	V-A
FIRE SPRINKLERED:	YES
STORIES:	1
TOTAL AREA:	±2,596 S.F.
PROPOSED LICENSED BEDS:	16 BEDS

PARKING TABULATION:

REQUIRED PARKING FOR "CONGREGATE CARE FACILITY (15 OR MORE)":

1 SPACE FOR EACH ON DUTY EMPLOYEE AND 1 SPACE FOR EACH 10 BEDS

REQUIRED PARKING:

PROPOSED 87-BED SNF - (87/10)	9
PROPOSED 16-BED PHF - (16/10)	2
PROPOSED TOTAL STAFF (1 PER STAFF)	41
TOTAL PARKING REQUIRED:	**52**

PROPOSED PARKING:

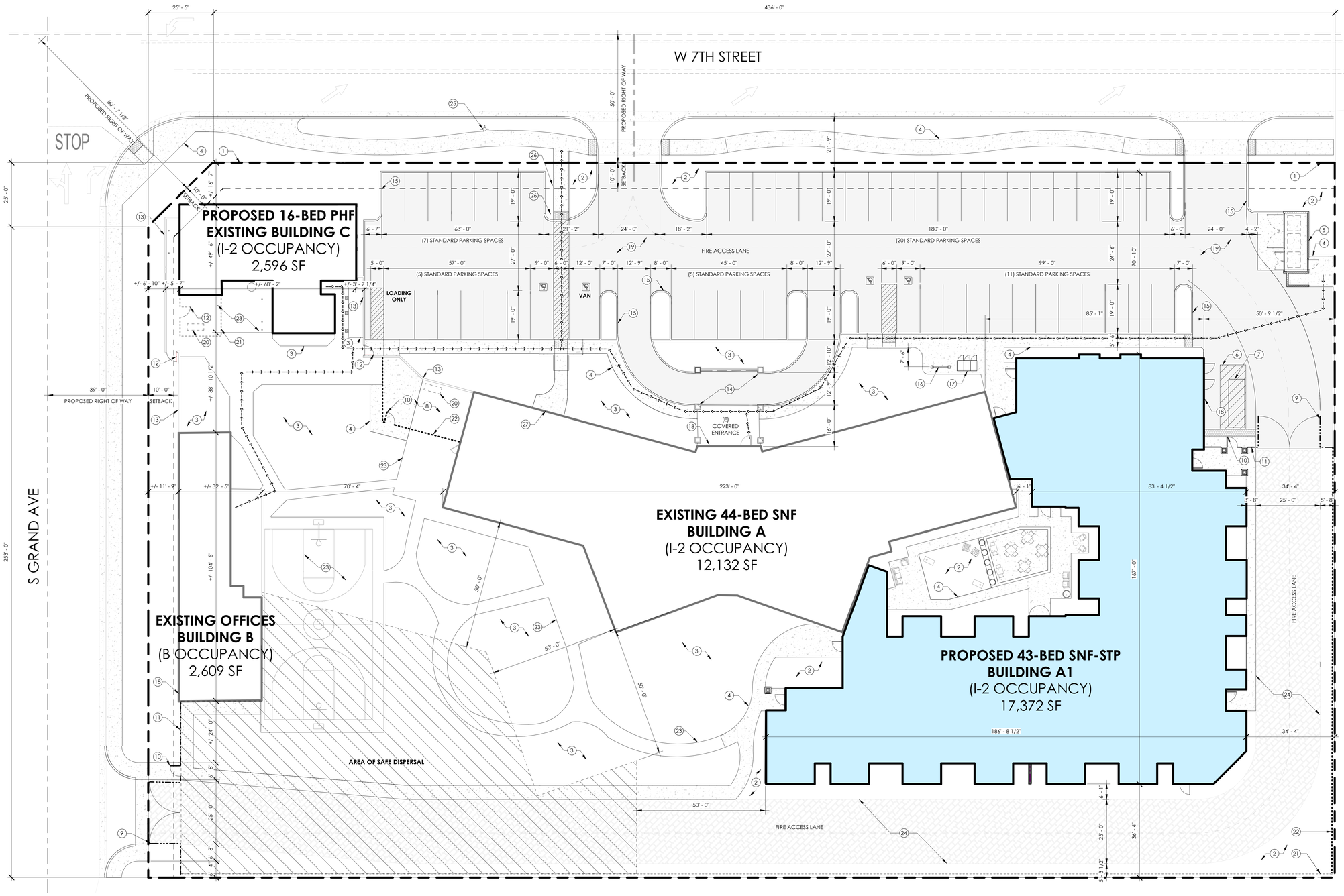
PROPOSED STANDARD SPACES	48
PROPOSED HANDICAP SPACES	4
TOTAL PARKING PROPOSED	**52**

REQUIRED BICYCLE PARKING:

5% OF REQUIRED MOTOR VEHICLE SPACES

PROPOSED BICYCLE PARKING:

PROPOSED SHORT-TERM SPACES	3
PROPOSED LONG-TERM SPACES	3
TOTAL BICYCLE SPACES	**6**



PROJECT DESCRIPTION

PROJECT #: PROJ25-0178

1. NEW FREESTANDING SKILLED NURSING FACILITY BUILDING ADDITION WITH 43 BEDS - 23 ROOMS WHEREIN MENTAL HEALTH PATIENTS ARE RESTRAINED AND DESIGNED WITH CONTROLLED EGRESS AT BUILDING EXITS AND DELAYED EGRESS AT EXTERIOR GATES.
2. INTERIOR REMODEL TO EXISTING SKILLED NURSING FACILITY
3. INTERIOR REMODEL TO EXISTING BUILDING FOR NEW 16-BED PSYCHIATRIC HEALTH FACILITY

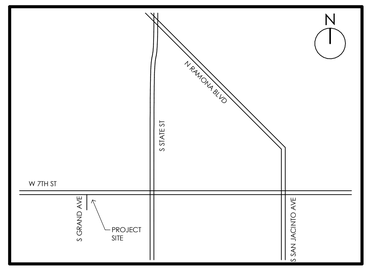
LEGEND

→→→→→→→→→→ ACCESSIBLE PATH OF TRAVEL

KEYNOTES

1	PROPERTY LINE
2	LANDSCAPING
3	EXISTING LANDSCAPING TO REMAIN
4	CONCRETE WALKWAY, TYP.
5	TRASH ENCLOSURE PER 17.305.130 WITH ADJACENT CAN WASH AREA
6	10' X 25' LOADING SPACE
7	GREASE INTERCEPTOR
8	ELECTRICAL SERVICE YARD
9	12'-0" W, X 7'-0" H. MANUAL VEHICULAR GATES WITH HEAVY DUTY HINGES, FOR FIRE LANE ACCESS ONLY
10	4'-0" W, GATE TO MATCH EXISTING GATES, WITH PANIC HARDWARE AND CONTROLLED EGRESS
11	EXISTING 7'-0" H. VINYL FENCE WITH STEEL FRAMES AT VEHICULAR GATES
12	EXISTING 4'-0" W. GATE TO REMAIN
13	EXISTING 7'-0" H. CMU WALL TO REMAIN
14	EXISTING PORTE COCHERE WITH 5'-0" X 20'-0" MINIMUM PASSENGER DROP OFF AND LOADING ZONE
15	6" CONCRETE CURB
16	3 SPACE BICYCLE RACK PARKING
17	3 BAY BICYCLE LOCKERS
18	KNOX BOX
19	ASPHALT CONCRETE PAVING
20	EMERGENCY GENERATOR ON 8" CONCRETE PAD
21	EXISTING 7'-0" H. CHAINLINK FENCE WITH VINYL SLATS TO REMAIN
22	7'-0" H. CHAINLINK FENCE
23	EXISTING CONCRETE FLATWORK TO REMAIN
24	PERVIOUS SURFACE FIRE ACCESS LANE TO BE DESIGNED AND CONSTRUCTED TO MEET OFM-01A REQUIREMENTS
25	FIRE HYDRANT
26	FIRE P.I.V. AND DCDA (BACKFLOW PREVENTOR)
27	EXISTING RISER

VICINITY MAP



REVISION RECORD

ISSUED: 04/06/2026

NO.	DATE	DESCRIPTION
1	06/**24**/2026	REVISION 1

PROPOSED SITE PLAN

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF AND 16-BED PHF)

SCALE: 1/16"=1'-0"

980 WEST 7TH STREET
GENERATIONS HEALTHCARE
6 HUTTON CENTRE DR #400
SANTA ANA, CA, 92707
P: (714) 241 - 5600

ARCHITECTURE + INTERIORS + PLANNING
321 NORTH RAMPART STREET, SUITE 101
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GREGG MAEDO + ASSOCIATES
www.gmaarch.com

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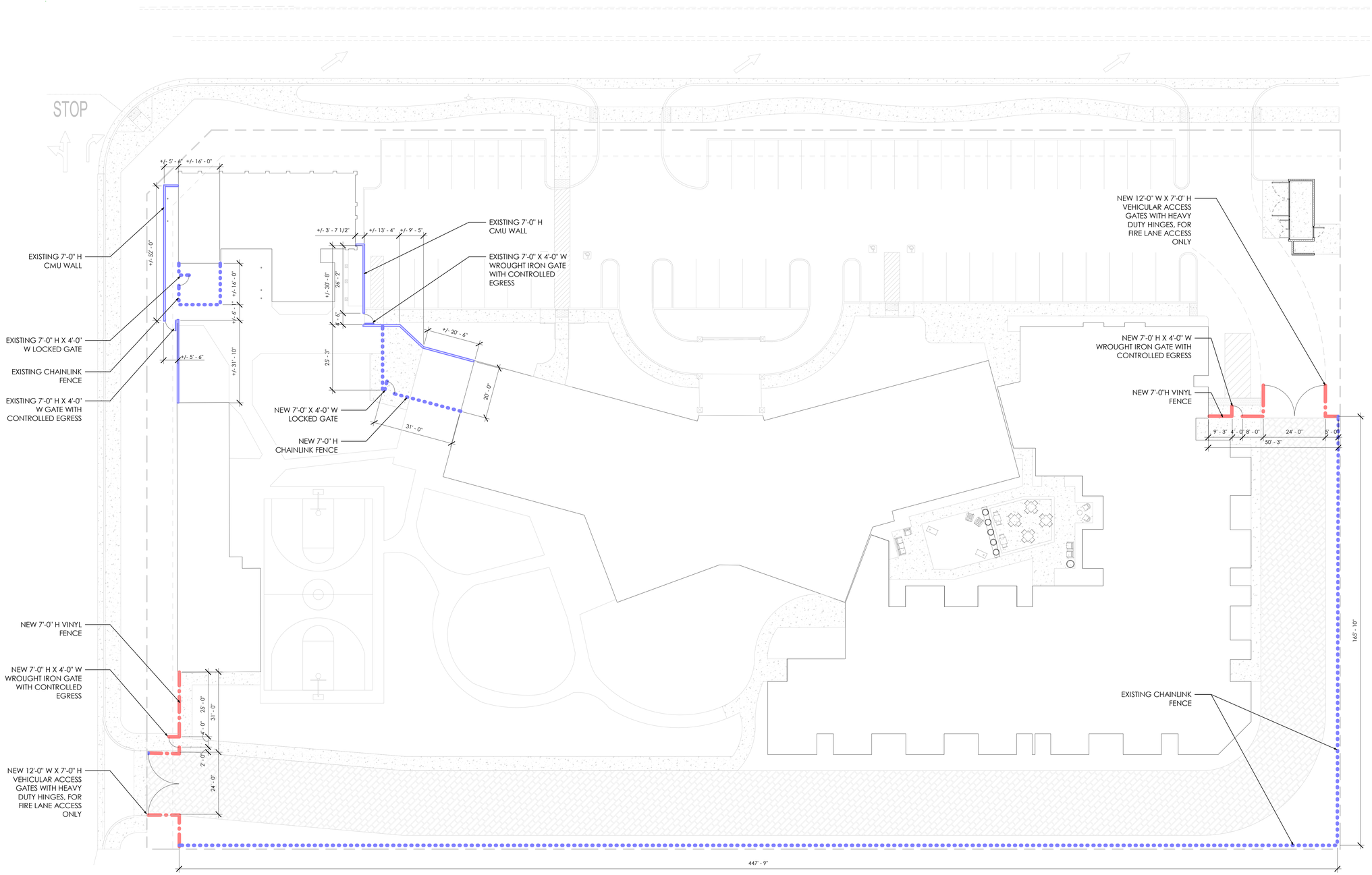

LEGEND

- EXISTING CMU WALL
- EXISTING CHAINLINK FENCE
- NEW VINYL FENCE

FENCE AND WALL SITE PLAN

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

0 8' 16' 32' 64'
SCALE: 1/16"=1'-0"

NORTH

980 WEST 7TH STREET

GENERATIONS HEALTHCARE
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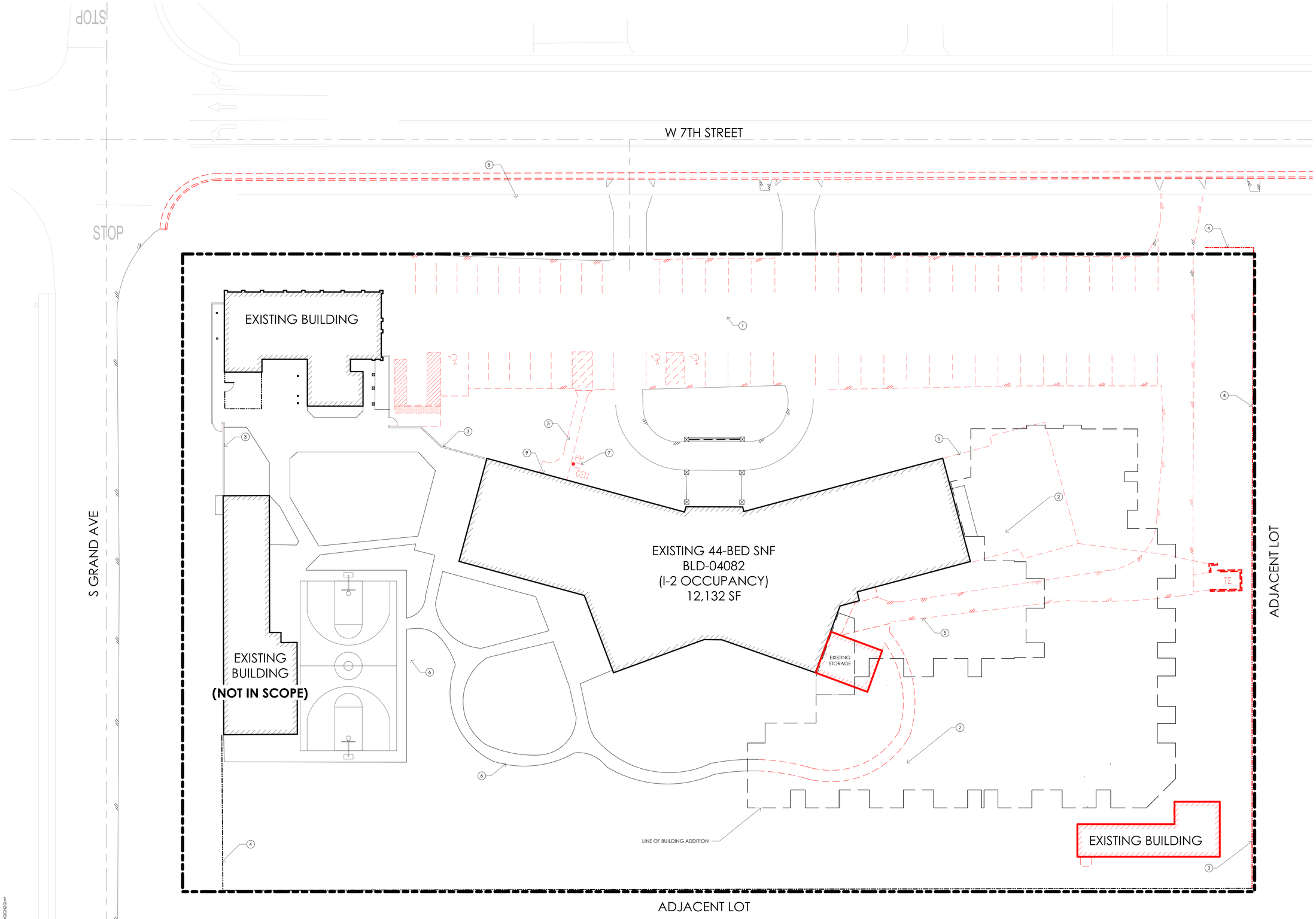

KEYNOTES

1 EXISTING PARKING LOT TO BE RE-PAVED & RE-STRIPED
2 EXISTING LANDSCAPING & HARDSCAPING TO BE REMOVED FOR FUTURE BUILDING PAD
3 EXISTING FENCE TO REMAIN
4 EXISTING CHANLINK FENCE AND GATE TO BE DEMOLISHED
5 EXISTING CONCRETE TO BE DEMOLISHED
6 EXISTING CONCRETE TO REMAIN
7 EXISTING TEMPORARY GENERATOR TO BE REMOVED
8 EXISTING FIRE HYDRANT TO BE REMOVED
9 EXISTING FIRE F.D.C. TO BE REMOVED

LEGEND

AREAS TO BE DEMOLISHED
STRUCTURE TO BE DEMOLISHED

EXISTING SITE PLAN

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

0 8' 16' 32' 64'
SCALE: 1/16"=1'-0"

NORTH

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OVERALL SNF FLOOR PLAN

0' 8' 24' 48'

SCALE: 3/32" = 1'-0"

NORTH

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

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PROPOSED ENLARGED PARTIAL SNF FLOOR PLAN

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"

NORTH

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

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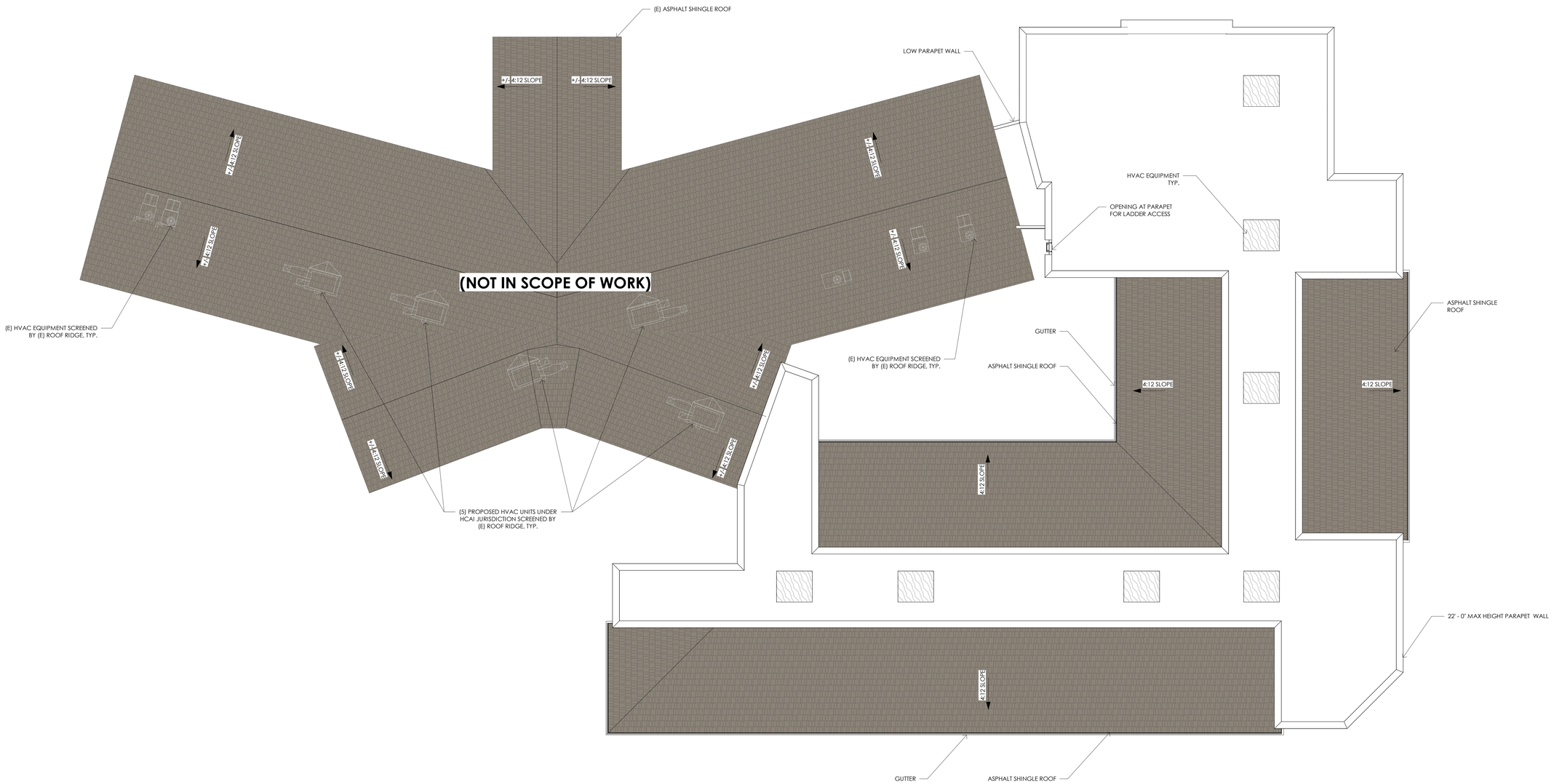

PROPOSED SNF ROOF PLAN

0' 8' 24' 48'

SCALE: 3/32" = 1'-0"

NORTH

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

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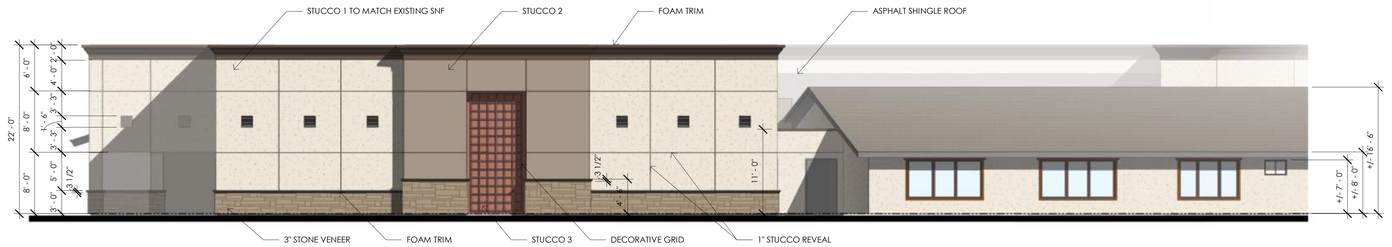


SNF EXTERIOR ELEVATION - NORTH

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"



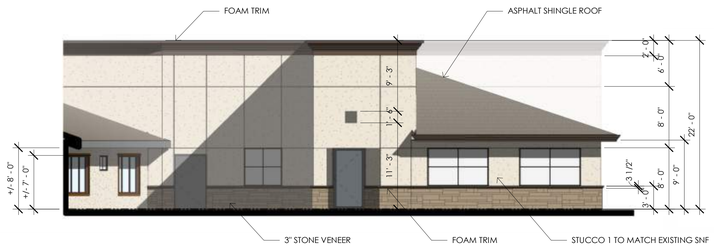
SNF EXTERIOR ELEVATION - EAST

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"



SNF EXTERIOR ELEVATION - SOUTH

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"



SNF EXTERIOR ELEVATION - WEST

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

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NORTH EAST SNF PERSPECTIVE VIEW

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

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NORTH SNF PERSPECTIVE VIEW

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

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ASPHALT SHINGLE



STONE VENEER PANEL



ALUMINUM GRID

STUCCO
PRIMARY



STUCCO
SECONDARY



STUCCO
ACCENT 1



STUCCO
ACCENT 2

PROPOSED SNF MATERIAL BOARD

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

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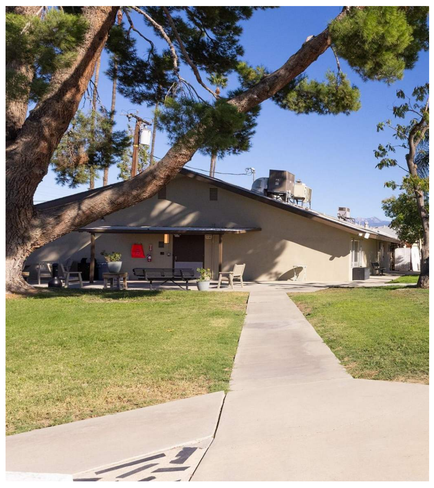





THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

980 WEST 7TH STREET

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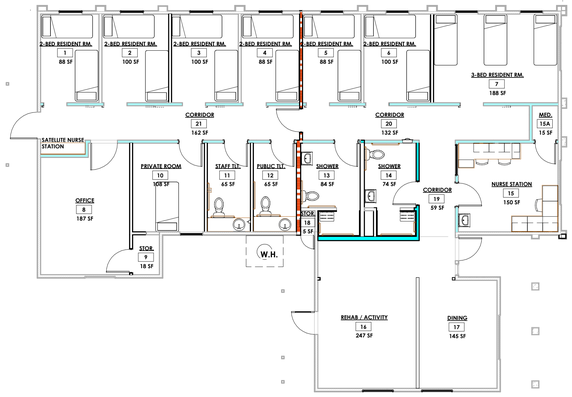


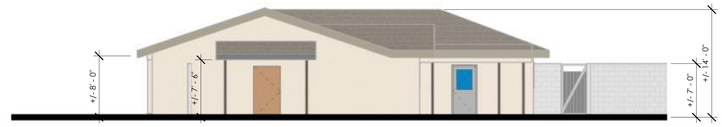
PROPOSED PHF OVERALL FLOOR PLAN

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"



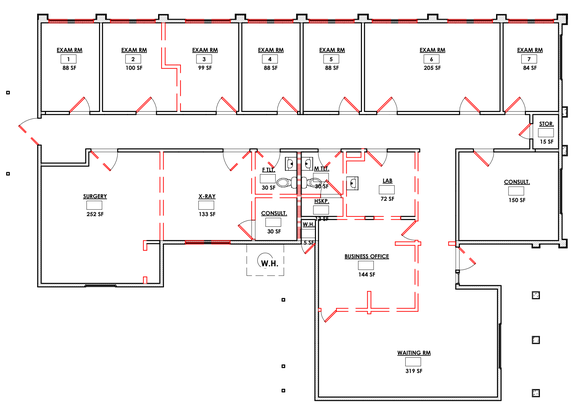
PROPOSED PHF - NORTH ELEVATION

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"



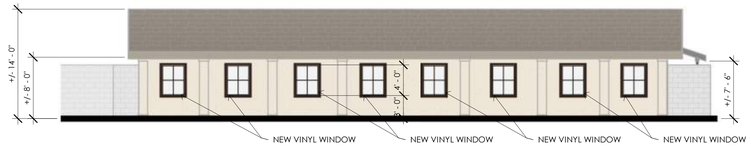
PROPOSED PHF - EAST ELEVATION

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"



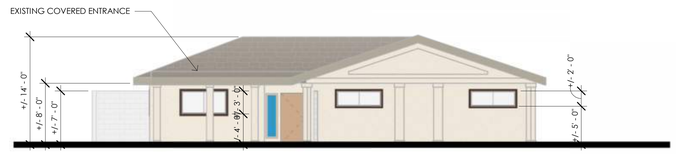
EXISTING PHF OVERALL FLOOR PLAN

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"



PROPOSED PHF - SOUTH ELEVATION

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"



PROPOSED PHF - WEST ELEVATION

0 4' 8' 16' 32'
SCALE: 1/8"=1'-0"

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

980 WEST 7TH STREET

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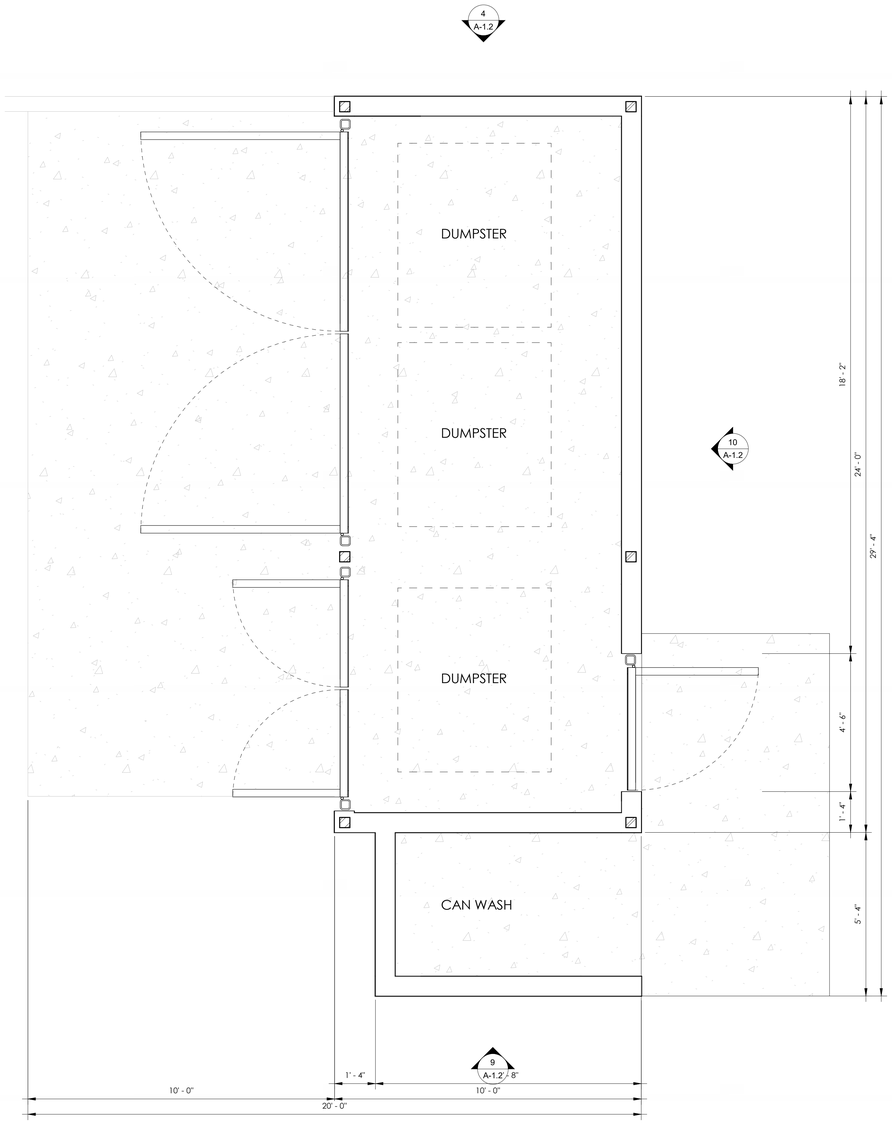

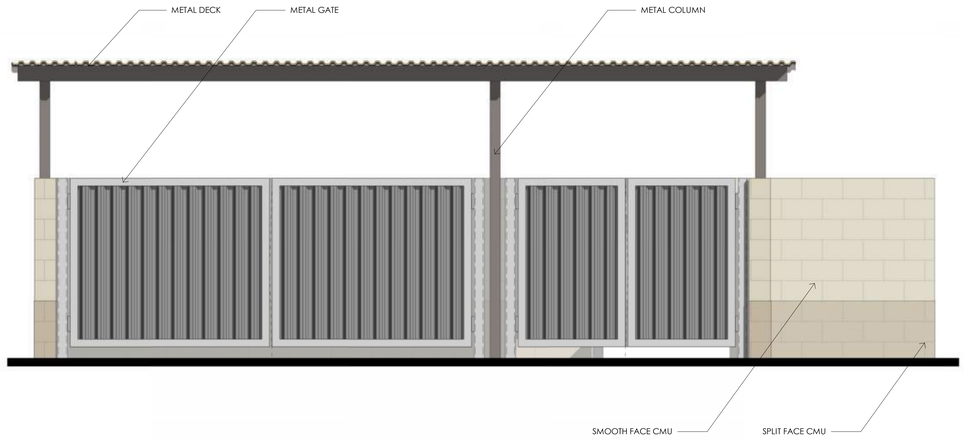

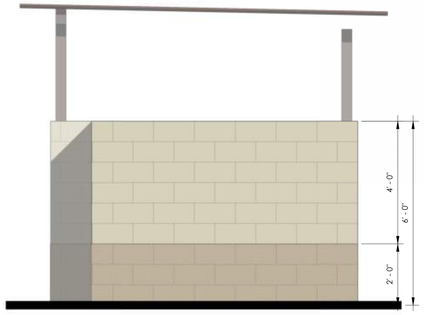

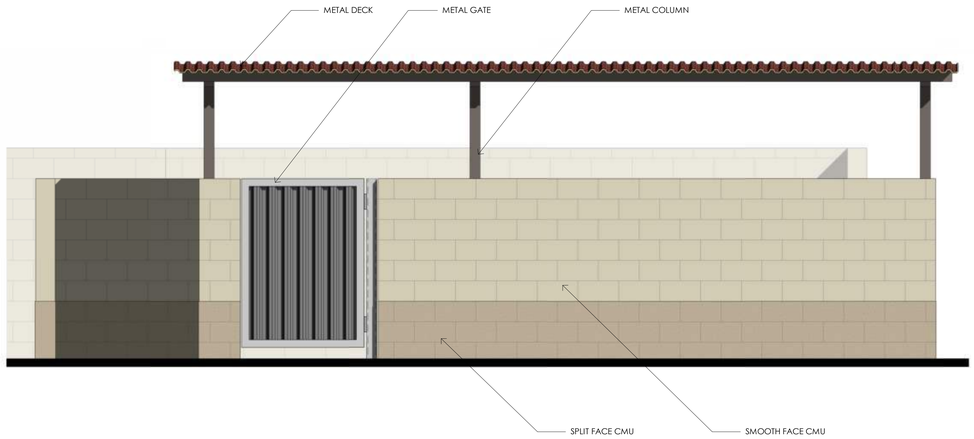

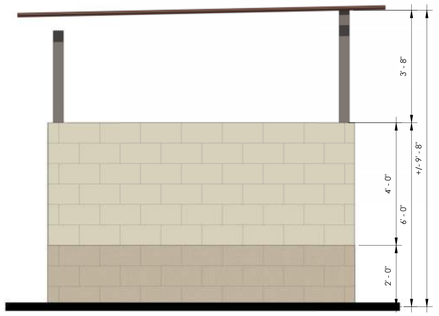

PROPOSED TRASH ENCLOSURE - PLAN

NORTH

0 1' 2' 4' 8'

SCALE: 1/2"=1'-0"

PROPOSED TRASH ENCLOSURE - ELEVATIONS

0 1' 2' 4' 8'

SCALE: 1/2"=1'-0"

THE BRADLEY GARDENS - BED EXPANSION (43-BED SNF & 16-BED PHF)

980 WEST 7TH STREET

GENERATIONS HEALTHCARE
6 HUTTON CENTRE DR #400
SANTA ANA, CA, 92707
P: (714) 241 - 5600

ARCHITECTURE + INTERIORS + PLANNING
321 NORTH RAMPART STREET, SUITE 101
ORANGE, CA 92868 . P: 714.937.1985
PROJECT#: 24060 . JUNE **24**, 2026

GREGG MAEDO + ASSOCIATES

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Attachment F

Resumes

Travis J. McGill

Biologist/Regulatory Specialist

Years of Experience: 18

Education

B.S., 2006, Biology, University of California at San Diego

Certifications

Certificate, 2012, Field Ornithology, University of California at Riverside, University Extension

Certificate, 2012, Wetland Delineation, Wetland Training Institute

Certificate, 2014, Certified California Rapid Assessment Method (CRAM) Practitioner, Riverine and Depressional Wetlands

Certificate, 2014, GIS and Spatial Analyst, California State University at Fullerton

Certificate Botany, 2015, University of California at Riverside, University Extension

Additional Training

Southwestern Willow Flycatcher Survey Training Workshop, Southern Sierra Research Station, 2014

Learning California Bird Sounds, Sea and Sage Audubon Society – Sylvia Gallagher, 2012

Introduction to Desert Tortoise Surveying, Monitoring, and Handling Techniques Workshop, Desert Tortoise Council, 2011

Skills and Specialties

General and Focused Habitat Assessments
Focused Sensitive Plant and Wildlife Surveys
Avian Surveys and Monitoring
Wetland and Stream Delineations
Regulatory Permit Processing
Mitigation Implementation
Endangered Species Permits

Mr. Travis McGill specializes in conducting due diligence surveys, habitat assessments, preparing biological technical reports, botanical surveys, protocol listed species surveys, and assisting with environmental permitting and compliance for both public and private sector clients. He assists clients in compliance with a range of environmental regulations, including the California Environmental Quality, National Environmental Policy Act, and State and Federal Endangered Species Acts. He also has experience preparing and processing federal and State Incidental Take Permits through the United States Fish and Wildlife Service (Section 7 and Section 10 of the Federal Endangered Species Act) and California Department of Fish and Game (Section 2080.1, 2081, subds. (b}{c) of the Fish and Game Code).

Mr. McGill conducts delineations of state and federal jurisdictional waters and helps clients through the regulatory permit process pursuant to Sections 404 and 401 of the Clean Water Act, the California Porter-Cologne Water Quality Control Act, and Section 1602 et. seq. of the California Fish and Game Code. Mr. McGill has effectively drafted and processed numerous state and federal regulatory applications for residential, restoration, commercial, flood control, institutional, and transportation projects. Mr. McGill also performs California Rapid Assessment Method analyses on riverine and depressioanl areas to identify the functionality of a drainage system.

Mr. McGill also prepares and conducts Worker Education Training programs, biological monitoring, and nesting bird and burrowing owl clearance surveys in compliance with the federal Migratory Bird Treaty Act and California Fish and Game Code Section 3503, 3503.5, and 3513.

Project Experience

Salt Creek Trail Project, Cities of Menifee and Hemet, California. *County of Riverside Transportation Department.* Biologist/ Regulatory Specialist. The County proposes to construct and operate two (2) segments of the Salt Creek Trail, which will contribute to the County's ultimate goal for an approximately 16-mile-long multi-use trail connecting the cities of Hemet and Menifee. The Project offers an alternative to gasoline-powered vehicle trips, which is key to achieving state and local air quality objectives. Mr. McGill prepared the Caltrans

Natural Environment Study, jurisdictional delineation, sensitive plant survey, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis, Determination of Biologically Equivalent or Superior Preservation (DBESP), and regulatory permits for the project. In addition, Mr. McGill attended several of the Western Riverside County Regional Conservation Authority (RCA) pre-application meetings to ensure project consistency with the MSHCP and negotiate the mitigation requirements for impacts to jurisdictional waters. Based on negotiations with the RCA and regulatory agencies, Mr. McGill prepared a Habitat Mitigation Monitoring and Reporting Plan to satisfy the mitigation requirements for the project.

Interstate 10/Avenue 50 Interchange Project, City Coachella, California. *City of Coachella*. Biologist/Regulatory Specialist. The project includes the construction of a new interchange at Interstate 10 (I-10) and Avenue 50, from PM R62.3 to R63.7, within the limits of the City of Coachella (City) in the County of Riverside. The proposed interchange is located approximately 3.4 miles east of the existing I-10/Dillon Road interchange (PM 58.9) and approximately 12.7 miles west of the existing I-10/Aqueduct Wash interchange (PM 75.0). Within the limits of the project, I-10 is a four-lane freeway with a median running down the center and no High Occupancy Vehicle (HOV) facilities. Mr. McGill conducted and prepared the delineation of State and federal jurisdictional waters report and tow Caltrans Natural Environment Study-Minimal Impact (NES-MI) reports for the Aerially Deposited Lead and Geotechnical Borings portions of the project. The NES-MI reports included a Coachella Valley MSHCP Consistency Analysis to demonstrate the projects consistency with the Coachella Valley MSHCP. Mr. McGill successfully delineated the jurisdictional boundaries of the drainage features on-site and documented the biological resources occurring within the Biological Study Area. As part of the NES-MI report, Mr. McGill helped prepare a project impact analysis that included quantifying project impacts and outlining a permitting strategy for impacts to jurisdictional waters. Mr. McGill successfully processed and obtained the Approved Jurisdictional Determination through the U.S. Army Corps of Engineers documenting that the drainage features on-site did not qualify as "Waters of the U.S".

Date Palm Drive Bridge over Whitewater River Cathedral City, California. *City of Cathedral City*. Biologist/Regulatory Specialist. The project included the widening of Date Palm Drive from four to six lanes adding sidewalks, bicycle lanes, and a central median. Mr. McGill conducted and helped prepare the delineation of State and federal jurisdictional waters report and Caltrans Natural Environment Study-Minimal Impact (NES-MI) for the project, which included a Coachella Valley MSHCP Consistency Analysis. Mr. McGill successfully delineated the jurisdictional boundaries of the Whitewater River and documented the biological resources occurring within the Biological Study Area. As part of the NES-MI report, Mr. McGill helped prepare a project impact analysis that included quantifying project impacts and outlining a permitting strategy for impacts to jurisdictional waters. Mr. McGill helped draft the resource agency permits through the California Department of Fish and Wildlife (Section 1602 Streambed Alteration Agreement), the Regional Water Quality Control Board (Section 401 Water Quality Certification), and the U.S. Army Corps of Engineers (Section 404 Nationwide Permit) for impacts occurring within the Whitewater River.

Sycamore Canyon Business Park Project, City of Riverside, California. *Hillwood Investment Properties.* Biologist/ Regulatory Specialist. The project would include the construction of two commercial warehouse buildings and associated infrastructure. In addition, multiple detention basins would be construction along the perimeter of the project site to treat surface runoff prior to being discharges off-site. Mr. McGill helped prepare the Delineation of State and Federal Jurisdictional Waters Report and Least Bell's Vireo focused survey reports for the project and assisted with the negotiation efforts with the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife for impacts to on-site jurisdictional features.

Bautista Recharge Basin Expansion Project, Riverside County, California. *Riverside County Flood Control and Water Conservation District*. Biologist/Regulatory Specialist. The District, in partnership with the Lake

Hemet Municipal Water District (LHMWD), proposed to design, construct, operate and maintain the Bautista Recharge Basin Expansion Project as part of an effort to fulfill the District's ongoing goal to promote water conservation and recharge. The recharge project was designed to promote infiltration and increase recharge in the Hemet-San Jacinto Valley groundwater basin areas. Mr. McGill prepared the habitat assessment, jurisdictional delineation, Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis, and Public/Quasi-Public Land Equivalency Analysis for the project.

Renaissance Specific Plan Burrowing Owl Relocation Plan, Rialto, California. *Lewis-Hillwood Rialto Company.* Biologist. The Renaissance Specific Plan was adopted by the City of Rialto in 1997 to provide a long-term strategy for the development of the Rialto Municipal Airport and surrounding area. Currently, Lewis – Hillwood Rialto Company, LLC owns or has an option to buy several of the properties within Renaissance Specific Plan Area. The proposed project included the development of a Town Center, residential housing ranging from low density to high density, a school, public park, a business center, and corporate center. Mr. McGill lead the biological studies for the project which include a general habitat assessment, focused burrowing owl survey, special-status plant suitability assessment, jurisdictional delineation and regulatory permitting. Several burrowing owl were found on the project site during the focused surveys, and Mr. McGill helped prepare a relocation plan that outlined the recommended methods proposed to relocate burrowing owls from the project site and provided measures that would be implemented for the maintenance, monitoring, and reporting of the relocated burrowing owls to increase chances of survivorship and ensure compliance with CDFW guidelines. Once the plan was approved by CDFW, Mr. McGill assisted the San Diego Zoo in the active relocation of the burrowing owls from the project site. The burrowing owls found within the project site were captured and actively relocated to a conservation site within the boundaries of the Western Riverside County MSHCP.

Date Palm Drive Bridge over Whitewater River, Cathedral City, California. *City of Cathedral City*. Biologist/Regulatory Specialist. The project included the widening of Date Palm Drive from four to six lanes adding sidewalks, bicycle lanes, and a central median. Mr. McGill conducted and helped prepare the delineation of State and federal jurisdictional waters report and Caltrans Natural Environment Study-Minimal Impact (NES-MI) for the project, which included a Coachella Valley MSHCP Consistency Analysis. Mr. McGill successfully delineated the jurisdictional boundaries of the Whitewater River and documented the biological resources occurring within the Biological Study Area. As part of the NES-MI report, Mr. McGill helped prepare a project impact analysis that included quantifying project impacts and outlining a permitting strategy for impacts to jurisdictional waters. Mr. McGill helped draft the resource agency permits through the California Department of Fish and Wildlife (Section 1602 Streambed Alteration Agreement), the Regional Water Quality Control Board (Section 401 Water Quality Certification), and the U.S. Army Corps of Engineers (Section 404 Nationwide Permit) for impacts occurring within the Whitewater River.

Andrew Mestas

Associated Biologist

Years of Experience: 3

Education

B.S., 2024, Biological Science, California State University, Fullerton

Research Assistant

Assisted in identifying Washington vascular and non-vascular plants, including special-status species such as the Wenatchee Mountains Checker-mallow (*Sidalcea oregana var. calva*), a federally endangered species.

Assisted in a field survey in the Gifford Pinchot National Forest, focusing on the Indian Heaven Wilderness area which included bryophyte collection of approximately 2000 specimens, herbarium preparation, and use of GPS and digital data collection tools

Additional Training

Introduction to Desert Tortoise Surveying, Monitoring, and Handling Techniques Workshop, Desert Tortoise Council, 2025

Skills and Specialties

General and Focused Habitat Assessments
Focused Sensitive Plant Surveys
Avian Surveys and Monitoring

Mr. Andrew Mestas is a biologist with three years of experience conducting habitat assessments, jurisdictional delineations, and protocol-level surveys for special-status species across southern California. His field experience includes Burrowing Owl focused surveys, Desert Tortoise surveys, and participation in Western Joshua Tree Incidental Take Permit census and processing efforts. Mr. Mestas has prepared and contributed to technical biological reports, Restoration Monitoring Plans, and MSHCP Consistency Analyses for projects subject to Habitat Conservation Plans such as the Western Riverside County MSHCP. He is proficient in the use of BIOS and CNDDB for species occurrence data review and analysis. Mr. Mestas is skilled in identifying regional flora, fauna, and plant communities, and has practical experience in plant cultivation in an academic setting.

Project Experience

Cook Street Hospital District Specific Plan, Palm Desert, Riverside County – Meridian Consultants, LLC. The project involves development of a core hospital and medical center complemented by supporting facilities, including a hotel to accommodate patient families, senior and assisted living residences, and high-density workforce housing for medical, hospitality, and retail employees. Mr. Mestas conducted focused surveys for Burrowing Owl and participated in field investigations to assess potential biological resources within the project area.

Palm Villas, Jurupa Valley, Riverside County – Mckenna Lanier Group. The project involves construction of the Palm Villas at Rancho Jurupa, an affordable housing community totaling 182 dwelling units on approximately 8.3 acres. Mr. Mestas conducted focused surveys for Burrowing Owl and prepared the report documenting survey results and existing site conditions.

Skyline Village, City of Corona, Riverside County – KWC Engineers. The project involves the development of 39 one-bedroom condominiums, 39 three-bedroom townhomes, and a 25,900-square-foot commercial space with restaurant, retail, and office uses. Mr. Mestas conducted the habitat assessment, MSHCP consistency analysis, and jurisdictional delineation and contributed to the preparation of the project's technical reports.

Baxter Iron Mine Desert Native Plant Survey, San Bernardino County – CalPortland. The project involves expanding existing mining operations—occurring on 49 acres—onto an additional 69 acres (increasing the mined footprint to 118 acres) within an approximately 280-acre site immediately south and

east of the current quarry. Mr. Mestas performed a Desert Native Plant Survey to identify cacti and other plant species protected by the San Bernardino County Desert Native Plant Ordinance, precisely GPS-tagging and georeferencing each individual and assembling relocation maps and supporting documentation to enable timely, compliant transplanting prior to project implementation.

Cajon Creek Conservation Area SBKR Study, San Bernardino County – Vulcan Materials Company. Mr. Mestas assisted in the collection of field data for the San Bernardino Kangaroo Rat (SBKR) Habitat Suitability Assessments within 23 designated plots of the Cajon Creek Conservation Area. Data collection included evaluating soil texture and compaction using penetrometers, characterizing surface soil composition, classifying vegetation communities, estimating percent cover for multiple vegetation and substrate categories, identifying dominant plant species, and recording evidence of disturbance, road types, and rodent activity levels. Collected data were used to assess habitat conditions influencing SBKR occupancy and to support long-term monitoring and management efforts conducted in coordination with USFWS, CDFW, and USGS.

10th St Palmdale, Palmdale, Los Angeles County. The project involves construction of an 823,516-square-foot warehouse and distribution facility on approximately 40 acres. Mr. Mestas conducted field investigations, a Western Joshua Tree inventory (census), and contributed to the Incidental Take Permit (ITP) processing and preparation of technical biological reports. He is scheduled to conduct protocol-level focused surveys for Burrowing Owl and presence/absence surveys for Desert Tortoise during the upcoming survey season.

Mission College Athletic Field, Sylmar, City of Los Angeles – Meridian Consultants. The project involves the development of new athletic facilities at Los Angeles Mission College, including a multi-purpose field with track, a new softball field, six tennis courts, restroom and concession buildings, associated parking areas, and renovation of an existing baseball field. Mr. Mestas participated in field investigations to assess biological resources within the project site, mapped jurisdictional aquatic features, and documented the presence of the special-status species Least Bell's Vireo. He also contributed to the preparation of technical biological reports and evaluated applicable city ordinances relevant to the project.

Johnson Road Warehouse Project, Palmdale, Los Angeles County – Palmdale Industrial Partners, LLC. The project involves construction of a new 823,516-square-foot warehouse and distribution facility on approximately 40.18 acres. Mr. Mestas conducted the field investigation, Western Joshua tree Inventory (census), and contributed to the ITP processing and technical reports. Mr. Mestas will conduct protocol-level focused surveys for burrowing owl as well as a presence/absence desert tortoise survey for this project in the upcoming appropriate season.

Central Basin MWD Prop 1, Los Angeles County – Tom Dodson & Associates. The project proposed installation of new recycled water pipelines to connect seven public sites in disadvantaged communities to the Central Basin Municipal Water District's existing recycled water transmission system. The Proposition 1 Recycled Water Customer Conversion Project aims to conserve potable water by converting irrigation systems at these sites to recycled water use. Mr. Mestas conducted field investigations for each of the seven subareas and prepared the Biological Resources Report documenting existing habitat conditions, potential impacts, and applicable regulatory considerations for the project.