# Appendix E

Rare Plant Survey Report



#### **Rincon Consultants, Inc.**



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July 24, 2024 Revised October 25, 2024 Rincon Project No: 23-15079

Stephanie Loucas Chief Development Officer RPCA Solar 13, LLC 44 Montgomery Street, Suite 3150 San Francisco, California 94104 Via email: stephanie@renewprop.com

Subject: Rare Plant Survey Report for the Proposed Sunrise Road Solar Project, Unincorporated San Bernardino County, California

Dear Ms. Loucas:

Rincon Consultants, Inc. (Rincon) is pleased to provide this Rare Plant Survey Report in support of the Sunrise Road Solar Project (Project). This Rare Plant Survey Report documents the results of a floristic survey effort for the two 40-acre Project parcels located near Boron, San Bernardino County, California.

This report documents the existing conditions of the Survey Area, defined as the Project parcels and a 50 foot (ft) buffer, and evaluates the potential presence of rare plants. The evaluation is based on the results of a desktop assessment of site conditions including soil types and vegetation communities, reviews of rare plant observations documented in the vicinity of the Survey Area in previous years, and floristic rare plant surveys conducted in spring 2024.

# **Project Location**

The Survey Area encompasses two 40-acre, privately owned parcels (County Assessor Parcel Number [APN] 0498-111-05 and 0498-111-04) in the Boron, Saddleback Mountain, Leuhman Ridge, and Kramer Junction United States Geological Survey (USGS) 7.5-minute topographic quadrangles (quads) in the western portion of the Mojave Desert. The Project is located along the western boundary of San Bernardino County and is approximately 0.25 mile east of the census-designated place of Boron in San Bernardino County. It is approximately 0.5 mile south of California State Route (SR)-58 and is approximately 0.02 mile north of Twenty Mule Team Road. The center point of the Survey Area is located at 35° 0'1.48"N 117°37'40.43"W. Adjacent land uses include sparsely distributed rural residential properties to the north and west, and open space to the east and south. Figure 1 below displays the regional location of the Project, and Figure 2 displays the Survey Area boundaries. Figure 3 depicts the Survey Area on the California USGS 7.5-minute topographic quadrangle map.

# **Regulatory Overview**

Local, state, and federal agencies regulate protected plant species and may require an assessment of their presence or potential presence to be conducted on site prior to the approval of proposed development on a property. Assessments for the potential occurrence of rare plant species are based upon geographic ranges and habitat preferences for the species, species occurrence records from the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) and other publicly available databases (e.g., Jepson eFlora), and species occurrence records from other sites in the vicinity of the Project.



For the purpose of this report, rare plant species are those plants listed, proposed for listing, or candidates for listing as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) under the federal Endangered Species Act (FESA; USFWS 1973); those listed or candidates for listing as rare, threatened, or endangered by CDFW under the California Endangered Species Act (CESA) or Native Plant Protection Act (NPPA; CDFW 2024d); those recognized by the CDFW under the California Native Plant Society (CNPS) / California Rare Plant Rank (CRPR) system (Ranks 1 through 4, Table 1; Rank Threat Code Extensions, Table 2; CNPS 2024); and locally significant plants, which are not rare from a statewide perspective but are rare or uncommon in a local context such as within a county or region.

Table 1 California Rare Plant Rank Definitions

Rank	Definition	
1A	Presumed Extinct in California	
1B	Rare, Threatened, or Endangered in California and elsewhere	
2	Rare, Threatened, or Endangered in California, but more common elsewhere	
3	Need more information (a Review List)	
4	Plants of Limited Distribution (a Watch List)	

Table 2 California Rare Plant Rank Threat Code Extensions

Threat Rank	Definition		
.1	Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)		
.2	Fairly endangered in California (20-80% occurrences threatened)		
.3	Not very endangered in California (<20% of occurrences threatened)		

#### California Desert Native Plants Act

The California Desert Native Plants Act (CDNPA) (California Food and Agriculture Code Section 80001-80201) protects certain species of California desert native plants from unlawful harvesting on both public and privately-owned lands. The CDNPA only applies within the boundaries of Imperial, Inyo, Kern, Los Angeles, Mono, Riverside, San Bernardino, and San Diego counties. Within these counties, the CDNPA prohibits the harvest, transport, sale, or possession of specific native desert plants, or any parts thereof, unless a person has a valid permit or receipt, and the required tags and seals. The appropriate permits, tags and seals must be obtained from the sheriff or commissioner of the county where collecting will occur, and the county will charge a fee.

#### Western Joshua Tree Conservation Act

In accordance with the Western Joshua Tree Conservation Act (WJTCA) Incidental Take Permit (ITP) Permitting guidance, CDFW prohibits the importation, export, take, possession, purchase, or sale of any western Joshua tree in California unless authorized by CDFW, without first obtaining an ITP. The WJTCA authorizes CDFW to issue several types of permits under certain circumstances including:

- WJTCA Hazard Management Permits, which provide authorization to remove dead trees or trim live
  or dead trees that pose a risk to structures or public health and safety. No permit fees or mitigation
  is required for these permits. The following conditions of the Hazard Management Permits are as
  follows for each WJT:
  - Has fallen over and is within 30 feet of a structure



- Is leaning against an existing structure
- Creates an imminent threat to public health or safety

WJTCA ITPs, which provide authorization for take in association with renewable energy, housing, public works, and other projects. The WJTCA ITP is streamlined through the option for an individual or business to choose to pay a standard mitigation fee rather than complete other compensatory mitigation actions (i.e., plant and/or translocate trees, preserve off site lands).

### San Bernardino County

The San Bernardino Countywide Plan Policy Plan (Countywide Plan) includes a Renewable Energy and Conservation Element (RECE), which aims to maintain the natural and scenic values of the lands while providing safe and reliable renewable energy sources for California. The RECE provides goals, policies, and implementation measures to encourage sustainable energy production and consumption while protecting the environmental resources of San Bernardino County.

In accordance with Chapter 88.01 of the San Bernardino County Development Code (plant protection and management), a permit is required where protected trees or plants are proposed for removal or relocation. Within the Desert Region, where the Project would be located, protected trees or plants requiring a Tree or Plant Removal permit from the County include the following:

- Dalea spinosa (smoketree), with stems 2 inches or greater in diameter or 6 feet or greater in height
- All species of the genus *Prosopis* (mesquites), with stems 2 inches or greater in diameter or 6 feet or greater in height
- All species of the family Agavaceae (century plants, nolinas, yuccas)
- Creosote rings, ten feet or greater in diameter
- All Joshua trees
- Any part of any of the following species, whether living or dead:
  - a. Olneya tesota (desert ironwood)
  - b. All species of the genus *Prosopis* (mesquites)
  - c. All species of the genus Cercidium (palo verdes)

Chapter 88.01 also requires that removal actions of all plants protected or regulated by the CDNPA shall comply with the provisions of the CDNPA before the issuance of a development permit or approval of a land use application.

# **Methodology**

The database search and literature review were conducted to identify rare plants that have been recorded in the Project vicinity. The field surveys were conducted to determine whether any such species are present in the Survey Area. The methods used for the database search/literature review and field surveys are described below.

#### **Database Search and Literature Review**

Prior to conducting the field surveys of the Survey Area (Figure 2), recent aerial photography (Google Earth Pro 2024) was reviewed, and CNDDB (CDFW 2024a), CNPS online Inventory of Rare and Endangered Plants of California (CNPS 2024), and USFWS Critical Habitat Portal (USFWS 2024a) were consulted for information on general botanical resources, rare plant species occurrences, and critical



habitat designations within the quadrangles containing the Survey Area and within a five-mile radius of the Survey Area. Additionally, the Western Joshua Tree Report (Rincon 2024) was reviewed. Rare plant species documented within five miles of the Survey Area were preliminarily assessed for their potential to occur (Attachment 1).

In addition, the Boron, Saddleback Mountain, Leuhman Ridge, and Kramer Junction USGS 7.5-minute topographic quadrangles (USGS 2024b) and the Web Soil Survey (United States Department of Agriculture, Natural Resources Conservation Service [USDA, NRCS] 2024) were reviewed to better characterize the Survey Area and their surroundings from a geologic and topographic perspective. The National Wetlands Inventory (NWI) (USFWS 2024b) and the National Hydrography Dataset (NHD) (USGS 2024a) were reviewed to understand the hydrology of the Survey Area.

Nomenclature follows *The Jepson Manual, Second Edition* (Baldwin et al. 2012) with updates available in the online Jepson eFlora (Jepson Flora Project 2024), with status updates provided in *State and Federally Listed Endangered, Threatened, and Rare Plants of California* (CDFW 2024d), *Special Vascular Plants, Bryophytes, and Lichens List* (CDFW 2024c), and the online Inventory of Rare and Endangered Plants of California (CNPS 2024).

### Field Surveys

The rare plant surveys were floristic in nature and generally followed the CNPS Botanical Survey Guidelines (CNPS 2001) and the Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Natural Communities (CDFW 2018).

The surveys were conducted by Rincon Botanists Kyle Gern and Alicia McCracken on March 21 and May 9, 2024 (Table 3). Field surveys were scheduled during the appropriate blooming period to optimize detection of rare plant species with potential to occur within the Survey Area. The surveys were conducted using systematic field techniques by walking meandering transects where safe and accessible to attain 100 percent visual coverage of the Survey Area. Special attention was given to areas with a high potential to support rare plant species (e.g., north-facing slopes, vegetation community interfaces, areas with unique soils). All plant species observed on site were recorded (Attachment 1).

**Table 3 Field Survey Information** 

Date	Surveyors	Hours	Weather
March 21, 2024	Kyle Gern and Alicia McCracken	0900 - 1330	55 – 65 degrees Fahrenheit (°F), winds 5-10 miles per hour (mph), 0-10 percent (%) cloud cover
May 9, 2024	Kyle Gern and Alicia McCracken	0900 - 1330	60 - 67 °F, winds 8-10 mph, 0-10% cloud cover

# **Existing Setting**

## Topography and Hydrology

The Survey Area is located on a gentle north-facing slope which ranges in elevation between 2,480-2,500 feet above mean sea level (amsl) (Figure 3). This site is located within the Hydrologic Unit Code (HUC) watershed (HUC-12 No. 180902062108) which is a subsection of the Antelope Fremont Valley watershed (HUC-10 1809020621) (USGS 2024c). The NWI maps three intermittent riverine drainages which cross the western and eastern portions of the Survey Area (USFWS 2024b), and the NHD maps three ephemeral features in the same area (USGS 2024a).



### Soil Types

No USDA, NRCS soil survey data is available for the Survey Area (USDA, NRCS 2024) or its vicinity. Therefore, the nearest soil map units in areas of similar topography, elevation, and landform were referenced in combination with site specific observations and the Project's geotechnical report (Salem 2023) to provide a summary of the soil observed on site. A formal soil survey was not conducted within the Survey Area and the soil observations are on a broad scale, at surface level, and do not match the level of detail or refinement that a soil survey would provide.

The topsoil throughout the Survey Area is a gravelly coarse sand that occurs on the relatively flat topography. Available water storage is likely very low, and the runoff class is likely high. The soil does not appear to be prone to flooding or ponding, nor does it appear to be hydric. Additionally, a moderate degree of off-highway vehicle disturbance is present along and adjacent to the dirt roads that dissect the Survey Area.

## **Results**

A total of 51 plant species were observed within the Survey Area during the 2024 botanical surveys. Of these, 42 are native and 9 are introduced. No rare plants were observed, however, one hundred fifty (150) Western Joshua trees occur on site, including the 50-foot survey buffer, as inventoried during the October 23 and 24, 2023, arborist survey (Rincon 2024). A comprehensive floral compendium documenting all plant species observed is presented in Attachment 2. Representative site photographs are provided in Attachment 3.

## Vegetation

The Survey Area can be generally described as Atriplex Polycarpa Shrubland – Allscale Scrub by the Manual of California Vegetation (Sawyer 2009). The dominant species in the tree layer is the Joshua tree (Yucca brevifolia; State Candidate Endangered). Dominant species in the shrub layer include spiny saltbush (Atriplex confertifolia), cattle spinach (Atriplex polycarpa), hop sage (Grayia spinosa), Anderson thornbush (Lycium andersonii), Cooper's boxthorn (Lycium cooperii), white bursage (Ambrosia dumosa), burrobush (Ambrosia salsola), and creosote bush (Larrea tridentata). Dominant species in the herbaceous layer include, bristly fiddleneck (Amsinckia tessellata), red brome (Bromus rubens), rose buckwheat (Eriogonum gracillimum), red stemmed filaree (Erodium cicutarium), yellow desert primrose (Oenothera primiveris), mediterranean grass (Schismus barbatus), and tumble mustard (Sisymbrium altissimum).

## Special-status Plants

Based on the database and literature review, 11 special-status plant species have been recorded within the vicinity (i.e., nine-quadrangle and/or five-mile radius) of the Survey Area (Attachment 1). Of the 11 species evaluated, none have a moderate or high potential to occur within the Survey Area based on factors ranging from the lack of suitable soils, inappropriate hydrologic conditions, absence of appropriate vegetation communities, lack of occurrences within five miles of the Survey Area, and lack of observation of conspicuous plant species during the field survey. Eight rare plant species have low potential (Attachment 1); no other rare plant species are expected to occur in the Survey Area.

Western Joshua tree was the only rare plant, DNPA species, and Countywide Plan species observed in the Survey Area. No other protected trees, CRPR or DNPA species, or plants protected by the County were observed within the Survey Area.



## **Conclusion**

Other than Western Joshua tree, no species listed as rare, threatened, or endangered under CESA or FESA, or CRPR plants were found within the Survey Area during the botanical survey, conducted during the appropriate survey window for maximum detectability. As discussed above, WJT were separately surveyed, and will be appropriately mitigated as discussed in the WJT Report prepared by Rincon (Rincon 2024). No special-status plant species have a moderate or high potential to occur within the Survey Area based on lack of habitat suitability and the results of the botanical surveys. Other than Western Joshua tree, special-status plant species are not expected to occur within the Survey Area based on negative findings of the field survey.

Rincon appreciates the opportunity to provide the information summarized in this report. Please do not hesitate in reaching out to the undersigned with questions related to the contents herein.

Robin Munay

Sincerely.

Rincon Consultants, Inc.

Alicia McCracken Biologist Robin Murray, Certified Consulting Botanist Supervising Biologist

Angie Harbin

**Director of Natural Resources** 

#### **Attachments**

**Figures** 

Attachment 1 Rare Plant Species Potential to Occur

Attachment 2 Floral Compendium

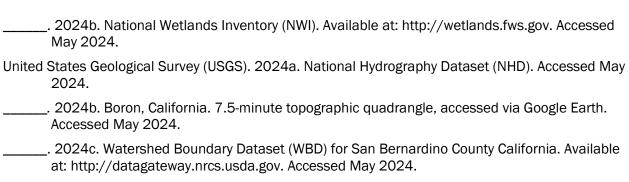
Attachment 3 Representative Site Photographs



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## Figure 1 Regional Location









Figure 2 Survey Area

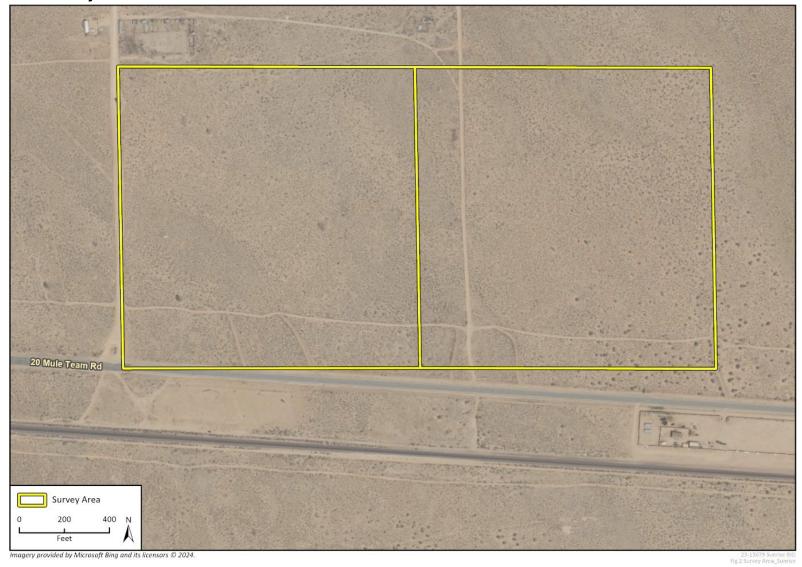
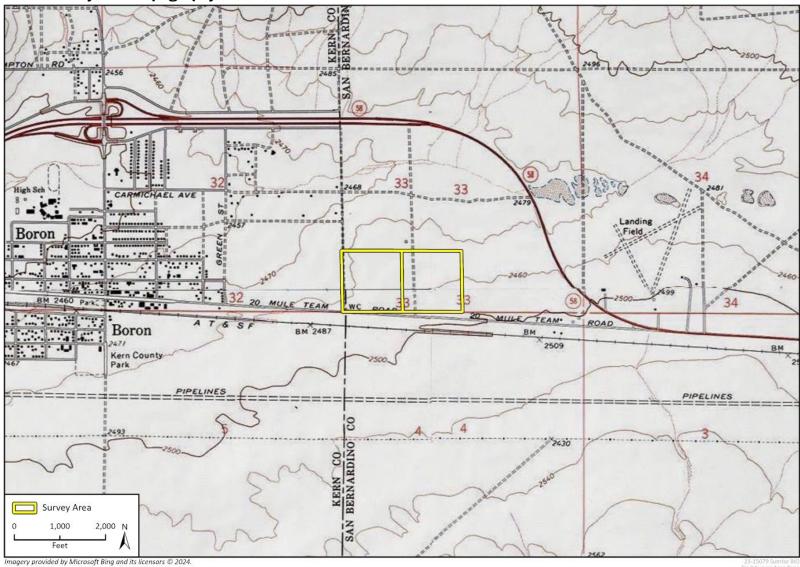




Figure 3 Survey Area Topography



# **Attachment 1**

Rare Plant Species Potential to Occur



#### Rare Plant Species in the Regional Vicinity of the Survey Area

Scientific Name Common Name	Status¹	Habitat Requirements	Potential to Occur in Survey Area	Habitat Suitability/Observations
Canbya candida white pygmy-poppy	None/None G3G4/S3S4 4.2	Annual herb. Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodland. Granitic, gravelly, sandy. Elevations: 1,970-4,790ft. (600-1,460m.) Blooms Mar-Jun.	Low Potential	Potentially suitable habitat, but no CNDDB occurrences in a nine-quadrangle search area of the site.
Chorizanthe spinosa Mojave spineflower	None/None G4/S4 4.2	Annual herb. Chenopod scrub, Joshua tree woodland, Mojavean desert scrub, playas. Alkaline (sometimes). Elevations: 20-4,265ft. (6-1,300m.) Blooms Mar-Jul.	Low Potential	Potentially suitable habitat, but no CNDDB occurrences in a nine-quadrangle search area of the site.
Cymopterus deserticola desert cymopterus	None/None G2/S2 1B.2	Perennial herb. Joshua tree woodland, Mojavean desert scrub. On fine to coarse, loose, sandy soil of flats in old dune areas with well-drained sand. Elevations: 2065-4,920ft. (630-1,500m.) Blooms Mar-May.	Low Potential	Potentially suitable habitat, and multiple CNDDB records within three miles of the site.
Delphinium recurvatum recurved larkspur	None/None G2?/S2? 1B.2	Perennial herb. Chenopod scrub, cismontane woodland, valley and foothill grassland. Alkaline. Elevations: 10-2,590ft. (3-790m.) Blooms Mar-Jun.	Not Expected	Potentially suitable habitat is absent from the site.
Eremothera boothii ssp. boothii Booth's evening-primrose	None/None G5T4/S3 2B.3	Annual herb. Joshua tree woodland, pinyon and juniper woodland. Elevations: 2,675-7,875ft. (815-2,400m.) Blooms Apr-Sep.	Low Potential	Although potentially suitable habitat for this species is present within and adjacent to the Project Area, the nearest documented occurrence is approximately 8 miles north of the site and is from the 1980s.
Eriophyllum mohavense Barstow woolly sunflower	None/None G2/S2 1B.2	Annual herb. Chenopod scrub, Mojavean desert scrub, playas. Mostly in open, silty or sandy areas w/saltbush scrub, or creosote bush scrub. Barren ridges or margins of playas. Elevations: 1640-3,150ft. (500-960m.) Blooms Mar-May.	Low Potential	Potentially suitable habitat, and multiple CNDDB records within three miles of the site.
Goodmania luteola golden goodmania	None/None G3/S3 4.2	Annual herb. Meadows and seeps, Mojavean desert scrub, playas, valley and foothill grassland. Alkaline or clay soils. Elevations: 65-7,220ft. (20-2,200m.) Blooms Apr-Aug.	Low Potential	Only some of the species' habitat components are present on the site. Although desert scrub is present, meadows and seeps and grassland habitats are absent, and alkaline/clay soils are absent.



Scientific Name Common Name	Status¹	Habitat Requirements	Potential to Occur in Survey Area	Habitat Suitability/Observations
Loeflingia squarrosa var. artemisiarum sagebrush loeflingia	None/None G5T3/S2 2B.2	Annual herb. Desert dunes, great basin scrub, Sonoran desert scrub. Sandy flats and dunes. Sandy areas around clay slicks with <i>Sarcobatus</i> , <i>Atriplex</i> , <i>Tetradymia</i> , etc. Elevations: 2,295-5,300ft. (700-1615m.) Blooms Apr-May.	Low Potential	Potentially suitable habitat, and multiple CNDDB records within three miles of the site.
Monardella exilis Mojave monardella	None/None G3?/S3 4.2	Desert dunes, Mojavean desert scrub, Great Basin scrub, chenopod scrub, pinyon and juniper woodland, Joshua tree woodland, lower montane coniferous forest. Sandy. 600-2,050m. Blooms Apr-Sep.	Low Potential	Potentially suitable habitat, but no CNDDB occurrences in a nine- quadrangle search area of the site.
Muilla coronata crowned muilla	None/None G3/S3 4.2	Perennial bulbiferous herb. Chenopod scrub, Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodland. Mostly on barren flats and ridges in sandy, granitic soils. Elevations: 2,200-6,430ft. (670-1,960m.) Blooms Mar-Apr(May).	Not Expected	Barren flats and ridges in sandy, granitic soils are absent from the site.
Nemacladus gracilis graceful nemacladus	None/None G4/S4 4.3	Annual herb. Cismontane woodland, valley and foothill grassland. Sandy or gravelly places. Elevations: 395-6235ft. (120-1,900m.) Blooms Mar-May.	Not Expected	Potentially suitable habitat is absent from the site.
Yucca brevifolia Western Joshua Tree	None/SCT G3G4/SNR	Perennial Broadleaf evergreen. Joshua tree woodland, montane chaparral, pinyon and juniper woodland, Sonoran and Mojavean desert scrub. Elevation:1600-7200ft (490-823m. Blooms Mar - May.	Present	Species present onsite.

<sup>&</sup>lt;sup>1</sup>Regional Vicinity refers to within a 9-quadrangle search radius of site.

#### **CRPR (CNPS California Rare Plant Rank)**

- 1B = Rare, Threatened, or Endangered in California and elsewhere
- 2B = Rare, Threatened, or Endangered in California, but more common elsewhere
- 4 = Limited Distribution (Watch List)

#### **CRPR Threat Code Extension**

- .1 = Seriously endangered in California (>80% of occurrences threatened/high degree and immediacy of threat)
- .2 = Moderately threatened in California (20-80% of occurrences threatened/moderate degree and immediacy of threat)
- .3 = Not very endangered in California (<20% of occurrences threatened/low degree and immediacy of threat)

#### **Other Statuses**

G1 or S1 =	Critically Imperiled Globally or Subnationally (state)	
G2 or S2 =	Imperiled Globally or Subnationally (state)	
G3 or S3 =	Vulnerable to extirpation or extinction Globally or Subnationally (state)	
G4/5 or S4/5 = Apparently secure, common and abundant		
GH or SH =	Possibly Extirpated – missing; known from only historical occurrences but still some hope of rediscovery	
SNR =	State Not Ranked	

# **Attachment 2**

Floral Compendium



## **Plant Species Observed Within the Survey Area**

Scientific Name¹	Common Name	Origin <sup>2</sup>
Ambrosia dumosa	white bursage	Native
Ambrosia salsola	burrobrush	Native
Amsinckia tessellata	bristly fiddleneck	Native
Astragalus lentiginosus	freckled milk vetch	Native
Atriplex confertifolia	spiny saltbush	Native
Atriplex polycarpa	cattle spinach	Native
Brassica tournefortii	Saharan mustard	Introduced; Cal-IPC - High
Bromus rubens	red brome	Introduced; Cal-IPC - High
Bromus tectorum	cheat grass	Introduced; Cal-IPC - High
Camissoniopsis pallida	pale yellow sun cup	Native
Camissonia campestris	field primrose	Native
Caulanthus lasiophyllus	California mustard	Native
Chaenactis fremontii	Fremont pincushion	Native
Chylismia claviformis	clavate fruited primrose	Native
Cryptantha circumscissa	cushion cryptantha	Native
Elymus elymoides	squirreltail	Native
Eremalche exilis	white mallow	Native
Eriastrum eremicum	desert woollystar	Native
Ericameria cooperi	Cooper's goldenbush	Native
Ericameria pinifolia	pine bush	Native
Eriogonum gracillimum	rose buckwheat	Native
Erodium cicutarium	red stemmed filaree	Introduced; Cal-IPC - Limited
Eschscholzia minutiflora	Coville's poppy	Native
Euphorbia albomarginata	rattlesnake sandmat	Native
Euphorbia serpens	matted sandmat	Introduced
Gilia stellata	star gilia	Native
Grayia spinosa	hop sage	Native
Hordeum murinum	foxtail barley	Introduced; Cal-IPC - Moderate
Krascheninnikovia lanata	winter fat	Native
Lepidium lasiocarpum	shaggyfruit pepperweed	Native
Larrea tridentata	creosote bush	Native
Lasthenia glabrata	yellow rayed goldfields	Native
Layia glandulosa	white layia	Native
Leptosyne bigelovii	Bigelow coreopsis	Native
Loeseliastrum matthewsii	desert calico	Native
Lomatium mohavense	Mojave wild parsley	Native
Lycium andersonii	Anderson thornbush	Native
Lycium cooperi	Cooper's boxthorn	Native
Malaaathriy dlahrata	desert dandelion	Native
Malacothrix glabrata	uesert dandenon	Native



Scientific Name <sup>1</sup>	Common Name	Origin <sup>2</sup>
Muilla maritima	common muilla	Native
Oenothera primiveris	yellow desert evening primrose	Native
Pectocarya penicillata	winged pectocarya	Native
Phacelia distans	common phacelia	Native
Salsola tragus	Russian thistle	Introduced; Cal-IPC - Limited
Schismus barbatus	Mediterranean grass	Introduced; Cal-IPC - Limited
Sisymbrium altissimum	tumble mustard	Introduced
Sphaeralcea ambigua	apricot mallow	Native
Stephonomeria pauciflora	wirelettuce	Native
Stipa hymenoides	sand grass	Native
Tetradymia stenolepis	Mojave cottonthorn	Native
Yucca brevifolia	western Joshua tree	Native, SCE
<sup>1</sup> Jepson Flora Project 2024.		

<sup>&</sup>lt;sup>2</sup> Cal-IPC 2024; CNPS 2024.



Representative Site Photographs



Photograph 1. Overview of site, view facing east. March 21, 2024.



Photograph 2. View of Joshua trees and goldfields, goldfields were largely in bloom during the first survey effort, view facing east. March 21, 2024.





Photograph 3. View of access road within the Survey Area, view facing southwest. March 21, 2024.



Photograph 4. View of access road within Survey Area, view facing north. March 21, 2024.





**Photograph 5.** Field of red stemmed filaree, which were prominent and in full bloom during the first survey effort, view facing west. March 21, 2024.



Photograph 6. View of Survey Area from Twenty Mule Team Road, view facing northwest. May 9, 2024.





**Photograph 7.** View of desert scrub within the Survey Area including white bursage, burrobush, spiny saltbush, cattle spinach, and Cooper's goldenbush; view facing southwest. May 9, 2024.