

September 15, 2022

Mr. David Ornelas
T&B Planning, Inc.
4909 Murphy Canyon Road, Suite 405
San Diego, CA 92123

Subject: Nevada Street Industrial Project—Biological Resources

Dear Mr. Ornelas:

This letter report describes the existing biological resources on the Nevada Street Industrial project site and evaluates the potential impacts to those resources that may occur as a result of project implementation. This report is intended to provide the County of San Bernardino (County) and applicant with information necessary to assess impacts to biological resources under the California Environmental Quality Act.

PROJECT LOCATION

The approximately 18.3-acre project site is located in Northwest Redlands area of the County west of Interstate 210, south of the Santa Ana River, and adjacent to Nevada Street (Figures 1 and 2). The project site evaluated herein includes all land within the property boundary plus an off-site impact area to the west along, and including, a portion of Nevada Street.

PROJECT DESCRIPTION

The project would entail redevelopment of the project site, which would transform the property from its long history of agricultural use to a modern industrial warehouse facility with associated office space, auto and trailer parking, fire lanes, landscaping, utilities, and an 8-foot-high, tubular steel fence. Access to the facility would be from two driveways off of Nevada Street.

METHODS

Background Research

Prior to conducting the biological fieldwork, background research was conducted to obtain information on the existing biological conditions on the project site and in its vicinity. Background research included a review of current local, State, and federal regulations, historical and current aerial imagery, U.S. Geological Survey topography, U.S. Department of Agriculture Natural Resources Conservation Service soil survey mapping, the National Hydrography Dataset (NHD), and National Wetlands Inventory (NWI).

Queries were made of the Consortium of California Herbaria, Calflora, California Natural Diversity Data Base (CNDDB), U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC), and Carlsbad Fish and Wildlife Office Occurrence Information for sensitive plant and/or animal species on site or within approximately 1 mile of the site. Reported occurrences of sensitive species from the project vicinity were used to evaluate the potential of such species to occur on the project site.

Site Assessment

Biologists Brian and Sandy Leatherman conducted a site visit on December 12, 2021. During the assessment, they walked the site, mapped existing biological resources, looked for potential jurisdictional areas, assessed the site for the potential presence of sensitive plant and animal species, compiled lists of plant and animal species (Attachments A and B, respectively), and took site photographs (Attachment C).

Vegetation Mapping

Vegetation and land cover types were mapped by hand on recent aerial imagery with a scale of 1 inch equal to 150 feet.

Sensitive Plant Species

The database searches returned results for 9 sensitive plant species within the project vicinity. However, based on the absence of potential habitat for these species or the long-disturbed and developed condition of the project site (see Results, Physical Description and Land Use below), it was determined that a focused plant species survey was not warranted.

Although not expected, sensitive plant species were searched for during the site visits conducted for the vegetation mapping and burrowing owl (*Athene cunicularia*; see Burrowing Owl Survey below) surveys conducted that coincided with the typical bloom period for most sensitive annual species (i.e., March through May).

Sensitive Animal Species

The database searches returned results of 14 sensitive animal species in the vicinity of project site. Based on the agricultural history of the site (see Results, Physical Description and Land Use below), it was determined that focused sensitive animal species surveys were not warranted, except for the burrowing owl. While other focused species surveys were not conducted, evidence of sensitive species occurrence was searched for during the initial site assessment and subsequent burrowing owl surveys.

Burrowing Owl Survey

Based on the site assessment, it was determined that a burrowing owl survey should be conducted due to the presence of potential grassland habitat and California ground squirrels (*Otospermophilus beecheyi*) and their burrows that may be used by the burrowing owl. A burrowing owl survey was conducted for the project during the burrowing owl nesting season in 2022 (Attachment D).

Potential Jurisdictional Features

During the December 2021 site visit, the project site was inspected for any features that have potential to be considered Waters of the U.S. (WUS) or Waters of the State (WS) under the jurisdiction of the U.S. Army Corps of Engineers (Corps), CDFW, and/or State Water Resources Control Board, or that are potential water-holding features that could be vernal pools or support sensitive species such as fairy shrimp.

RESULTS

Physical Description and Land Use

The project site is essentially level, with on-site elevations ranging from approximately 1,180 to 1,200 feet above mean sea level. The soil mapped on site is Hanford sandy loam (0 to 2 percent slopes). Historic aerial imagery shows the project site in agricultural production as far back as 1938. The historic imagery shows orchards from 1938 through 1968. At some point between 1968 and 1980, the site was cleared, and row crops were grown until approximately 2014. Imagery from 2016 shows the site as fallow. Imagery from 2018 shows it disced (National Environmental Title Research, LLC 2022). Google Earth imagery also shows that row crops were still present up until approximately 5 to 6 years ago. The project site is surrounded by existing development including industrial buildings to the south and east, a landfill to the west, and a wastewater treatment plant to north (Figure 2).

Vegetation Communities and Land Cover

Two vegetation communities and developed land are present on the project site (Table 1; Figure 3).

Table 1 VEGETATION COMMUNITIES/LAND COVER ON THE PROJECT SITE	
Vegetation Communities/Land Cover	Acres
Non-native grassland	16.9
Disturbed habitat	1.1
Developed	0.3
TOTAL	18.3

Non-native grassland occupies the majority of the project site (16.9 acres) and is comprised of species such as ripgut grass (*Bromus diandrus*), red brome (*Bromus rubens*), Mediterranean schismus (*Schismus barbatus*), and soft chess (*Bromus hordeaceus*).

Disturbed habitat (1.1 acres) occurs in northwest corner of the project site. Characteristic plant species of this community include Russian thistle (*Salsola tragus*), lamb's quarters (*Chenopodium album*), tree tobacco (*Nicotiana glauca*), and cheeseweed (*Malva parviflora*).

Developed land (0.3 acre) on the project site includes a portion of Nevada Street.

Plant Species

Plant species observed on site consist almost exclusively of non-sensitive, non-native species. Nine sensitive species have been reported in the vicinity of the project site and are listed below. No sensitive plant species were observed on site, however, and none is anticipated to occur due to the absence of habitat and/or given the long agricultural history of the site as explained below.

Summarily, the California Rare Plant Ranks for the 9 sensitive plant species listed below are defined as follows:

1A = Presumed extirpated or extinct.

1B = rare or endangered

4 = uncommon in California

- California spineflower (*Mucronea californica*; California Rare Plant Rank 4.2) occurs in chaparral, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grassland. While there is grassland on the site currently, the site's long agricultural history makes the potential for this species to occur very low. It was not observed on site during burrowing owl site visits in May and June that coincided with this plant's bloom period of March to July or August.
- Marsh sandwort (*Arenaria paludicola*; California Rare Plant Rank 1B.1) occurs in brackish and freshwater marshes and swamps that are not present on site.
- Nevin's barberry (*Berberis nevinii*; federal and State endangered, California Rare Plant Rank 1B.1) occurs in chaparral, cismontane woodland, coastal scrub, and riparian scrub, which are not present on site.
- Parish's bush-mallow (*Malacothamnus parishii*; California Rare Plant Rank 1A) occurs in chaparral and coastal scrub, which are not present on site.
- Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*; California Rare Plant Rank 4.3) occurs in chaparral and coastal scrub, which are not present on site.

- Salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*; federal and State endangered, California Rare Plant Rank 1B.2) occurs on coastal dunes and in coastal salt marshes and swamps, which are not present on site.
- San Diego ambrosia (*Ambrosia pumila*; federal endangered, California Rare Plant Rank 1B.1) occurs in chaparral, coastal scrub, valley and foothill grassland, and vernal pools. While there is grassland on the site currently, the site's long agricultural history makes the potential for this species to occur very low. It was not observed on site during burrowing owl site visits in May and June that coincided with this plant's bloom period of April to October.
- Santa Ana River woolly-star (*Eriastrum densifolium* ssp. *sanctorum*; federal and State endangered, California Rare Plant Rank 1B.1) generally occurs on alluvial fans in chaparral and coastal scrub; none of which is present on site.
- Slender-horned spineflower (*Dodecahema leptoceras*; federal and State endangered, California Rare Plant Rank 1B.1) occurs in chaparral, cismontane woodland, and on alluvial fans in coastal scrub; none of which is present on site.

Animal Species

Three reptile, 35 bird, and 4 mammal species were observed or detected during the site surveys. Two of those are sensitive and were observed during the burrowing owl. They include the coastal (tiger) whiptail (*Aspidoscelis tigris stejnegeri*) and the American peregrine falcon (*Falco peregrinus anatum*), as follows.

Coastal (tiger) whiptail (*Aspidoscelis tigris stejnegeri*)

Sensitivity: CDFW Species of Special Concern = declining population levels, limited ranges, and/or continuing threats have made these species vulnerable to extinction.

Distribution: Ventura County south, in cismontane California, to south-central Baja California, Mexico.

Habitats: Open coastal sage scrub, chaparral, and woodlands. Frequently found along the edges of dirt roads traversing its habitats. Important habitat components include open, sunny areas, shrub cover with accumulated leaf litter, and an abundance of insects, spiders, or scorpions.

Status on site: The coastal whiptail was observed during the burrowing owl survey.

American peregrine falcon (*Falco peregrinus anatum*)

Sensitivity: CDFW Fully Protected = species that may not be taken or possessed without a permit from the Fish and Game Commission and/or CDFW.

Distribution: From the tundra to the tropics, but occurs throughout much of North America from Alaska and Canada south to Mexico.

Habitat(s): Generally, areas with cliffs near water where prey (shorebirds and ducks) is concentrated. Preferred hunting areas are agricultural fields, meadows, marshes, and lakes. Nesting usually occurs on cliff ledges or in a scrape in debris and occasionally in the old nests of other birds.

Status on site: The peregrine falcon was observed during the burrowing owl survey and was likely present in the area due to the presence of the open ponds of the water treatment plant to the north of the project site. Waterfowl (mallard [*Anas platyrhynchos*] and cinnamon teal [*Spatula cyanoptera*] associated with the ponds were also observed during the burrowing owl survey and are potential prey for the peregrine falcon.

No burrowing owl or potential burrowing owl sign/evidence was observed during the burrowing owl survey. And, based on the negative results of the 2022 field survey, the site is not anticipated to be occupied by the species (Attachment D).

Thirteen other sensitive animal species have been reported in the vicinity of the project site as listed below. None of these sensitive animal species was observed on site, and none is anticipated to occur due to the absence of habitat and/or given the long agricultural history of the site as explained below. Furthermore, since the coast horned lizard's (*Phrynosoma blainvillii*) distribution overlaps with that of the coastal (tiger) whiptail that was observed, and they occupy similar habitats, the coast horned lizard's potential to occur is also evaluated below; although it, too, was not reported in the vicinity of the project site.

- Monarch (*Danaus plexippus* [California overwintering population]; State candidate) roosts are in wind-protected tree groves with nectar and water sources nearby. There is no roosting habitat on site for an overwintering population.
- Santa Ana sucker (*Catostomus santaanae*; federal threatened) is primarily found in small- to medium-sized streams that flow year-round. There are no streams on the project site.
- Steelhead (*Oncorhynchus mykiss irideus*; southern California distinct population segment; federal threatened, State candidate endangered) occurs in Pacific Coast streams that are not present on site.
- California glossy snake (*Arizona elegans occidentalis*; CDFW species of special concern) inhabits scrub, rocky washes, chaparral, and grasslands. While grassland is currently present on site, this species is not anticipated to occur because of the long agricultural history of the site. The site has been subject to row crop production with regular soil disturbance for at least 34 years (from approximately 1980 to 2014) and at least occasionally thereafter (imagery from 2018 shows it disced). Also, the site is surrounded by existing development (Figure 2), so it is unlikely that there are any glossy snakes present just off site that could occupy the site in the near future.

- Coast horned lizard (*Phrynosoma blainvillii*; CDFW species of special concern) occurs in coastal sage scrub and open areas in chaparral, oak woodlands, and coniferous forests with sufficient basking sites, adequate scrub cover, and areas of loose soil. It requires the presence of native ants, especially harvester ants (*Pogonomyrmex* sp.) and is generally excluded from areas invaded by Argentine ants (*Linepithema humile*). No harvester ants were observed on site during the initial visit or subsequent burrowing owl surveys. The coast horned lizard is now absent from much of its former southern California range due to urbanization, agricultural development, and over-collecting (Jennings 1987, 1988). Like the coastal (tiger) whiptail, which was observed on site, the coast horned lizard is also a diurnal species that can be readily observed. Due to the long history of agriculture on the site, and the fact that the species was not observed during any of the site surveys, the coast horned lizard is considered to have low potential (not expected) to occur.
- Coastal California gnatcatcher (*Polioptila californica californica*; federal threatened, CDFW species of special concern) occurs in coastal sage scrub, which is not present on site.
- Least Bell's vireo (*Vireo belli pusillus*; federal and State endangered) occurs in riparian woodland and scrub habitats that are not present on site.
- Southwestern willow flycatcher (*Empidonax traillii extimus*; federal and State endangered) occurs in thickets of willows or other riparian understory usually along streams, ponds, lakes, or canyons; none of which is present on site.
- Los Angeles pocket mouse (*Perognathus longimembris brevinasus*; CDFW species of special concern) is confined to lower elevation grasslands and coastal sage scrub habitats in areas with fine, sandy soil. While the site currently supports grassland with sandy soil, the species is not anticipated to occur because of: 1) the long history of row crops and soil disturbance on the site and 2) the site's separation, by existing development, from the upper terraces of the Santa Ana River and potential adjacent habitat areas to those terraces such as those noted in the CNDDDB (i.e., the site is surrounded by development; Figure 2). The CNDDDB record location is in the "eastern end of Norton Air Force Base [now San Bernardino International Airport] in the "far southeast portion of mapped area along Alabama Road" (Figure 2).
- Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*; CDFW species of special concern) occurs in open areas of coastal sage scrub and weedy growth, often on sandy substrates. While the site could be somewhat classified as having weedy growth, and it does have a sandy substrate, this pocket mouse is not expected to occur for the same reasons as the Los Angeles pocket mouse.
- Pocketed free-tailed bat (*Nyctinomops femorosaccus*; CDFW species of special concern) is typically associated with rugged canyons, high cliffs, and rock outcroppings in semiarid landscapes. It roosts in crevices in cliffs, outcrops, slopes, and shallow caves during the day and also may roost in buildings or under roof tiles. There is no habitat for this species on site.

- San Bernardino kangaroo rat (*Dipodomys merriami parvus*; federal endangered, State candidate endangered, CDFW species of special concern) occurs in alluvial fan scrub habitats with sandy soils deposited by fluvial (water) rather than aeolian (wind) processes. While designated Critical Habitat for this species is located approximately 725 feet northeast of the project site, the project site does not support alluvial fan scrub habitats. Additionally, the site has been subject to row crop production with regular soil disturbance for at least 34 years (from approximately 1980 to 2014) and at least occasionally thereafter (imagery from 2018 shows it disced), and the site is not connected to occupied habitat or potential habitat (including Critical Habitat) because it is surrounded by existing development including industrial buildings to the south and east, a landfill to the west, and a wastewater treatment plant to north (Figure 2). While Carlsbad Fish and Wildlife Office Occurrence Information has records associated with the water treatment plant north of the project site, the locations are in alluvial fan scrub (i.e., Riversidean alluvial fan sage scrub in the Santa Ana River). Finally, no sign of this species being present (burrows, dust baths, tail drags, scat, etc.) were observed during site surveys. Therefore, the San Bernardino kangaroo rat is not expected to occur on site.
- Stephens' kangaroo rat (*Dipodomys stephensi*; federal and State threatened) was included in the IPaC results but has not been reported to the CNDDDB within 1 mile of the project site, nor is it in the Carlsbad Fish and Wildlife Office Occurrence Information for the site vicinity. Stephens' kangaroo rats occupy sparsely vegetated scrub and grassland habitats. While grassland is currently present on site, the site has been long subject to row crop production and soil disturbance, as noted earlier, and it is surrounded by development. Furthermore, the USFWS states that the Stephens' kangaroo rat is currently found in a patchy distribution in Riverside and San Diego counties (not San Bernardino County; USFWS 2022). Finally, no sign of this species being present (burrows, dust baths, tail drags, scat, etc.) were observed during site surveys. For these reasons, Stephens' kangaroo rat is not expected to occur on site.
- Western mastiff bat (*Eumops perotis californicus*; CDFW species of special concern) occurs in arid and semiarid, rocky canyon habitats and roosts in crevices and shallow caves on the sides of cliffs and rock walls, and occasionally, buildings. The roosts are usually high above the ground with an unobstructed approach. There is no habitat for this species on site.

The potential for 5 sensitive raptors that occur in San Bernardino County to utilize the site was also evaluated as explained below. Sensitivity ratings not previously defined and that are used below are listed here:

State watch list = taxa that were previously designated as "species of special concern" but no longer merit that status, or which do not yet meet species of special concern criteria, but for which there is concern and a need for additional information to clarify status.

Federal bird of conservation concern = migratory and non-migratory bird species (beyond those already designated as federal threatened or endangered) that represent highest conservation priorities and draw attention to species in need of conservation action.

- Golden eagle (*Aquila chrysaetos*; CDFW fully protected, State watch list) forages in open and semi-open habitats (Cornell Lab of Ornithology 2014). Habitats in the western U.S. tend to support substantial prey populations of black-tailed jackrabbits (Johnsgard 1990); it also preys on small mammals such as cottontail rabbits and ground squirrels (Kochert et al. 2002) and will prey on birds, reptiles, carrion, and less often, fish and larger mammals (USFWS 2009). Golden eagles nest in open and semi-open habitats but also may nest in coniferous habitat when open space is available, (e.g., fire breaks; USFWS 2010). Nesting occurs on cliff ledges or in trees on steep slopes. Golden eagles will occasionally nest near semi-urban areas where housing density is low and in farmland habitat; however, golden eagles have been noted to be sensitive to some forms of anthropogenic presence (Palmer 1988 in USFWS 2010). While some potential foraging habitat is present on the project site, and desert cottontail and California ground squirrel were observed on site, it is likely that the site is in an area that is too developed for this species. The golden eagle was not reported to the databases searched within 1 mile of the project site.
- Swainson's hawk (*Buteo swainsoni*; State threatened) utilizes desert, shrubsteppe, grassland, and agricultural habitats but occurs only as a locally common to rare breeder in California. With rare exceptions, Swainson's Hawks are complete migrants, wintering in southern South America. The majority of breeding sites of Swainson's hawks in North America are in the Great Basin and Central Valley (Woodbridge 1988). Due to the small size of the project site and the status of this species as a rare breeder in California, the Swainson's hawk is not expected to occur. Swainson's hawk was not reported to the databases searched within 1 mile of the project site.
- Northern harrier (*Circus hudsonius*; federal bird of conservation concern, CDFW species of special concern) wintering habitat in California includes fresh and saltwater wetlands, coastal dunes, grasslands, deserts, meadows, and crop lands. Breeding habitat includes freshwater wetlands, coastal brackish wetlands, open wet meadows and grasslands, shrub-steppe communities, desert sinks, areas along rivers and lakes, and agricultural fields. The project site supports a small parcel of potential grassland habitat, but it is surrounded by existing development, and there are much larger areas of potential habitat, particularly to the north in/along the Santa Ana River and to the east of Interstate 210. It is not likely, therefore, that the site would be used by the northern harrier. Northern harrier was not reported to the databases searched within 1 mile of the project site.
- White-tailed kite (*Elanus leucurus*; CDFW fully protected) habitat includes riparian woodlands and oak or sycamore groves adjacent to grassland. While grassland is present on site, such woodlands and groves are not present on site or adjacent. The small, remnant citrus grove on the west side of Nevada Street adjacent to the landfill to the west is not likely to support white-tailed kite nesting because the trees are too small. The white-tailed kite typically nests in tree crowns that are 20 to 50 feet above the ground (Palmer 1988) The white-tailed kite was not reported to the databases searched within 1 mile of the project site.

- Bald eagle (*Haliaeetus leucocephalus*; State endangered, CDFW fully protected) typically nests in forested areas adjacent to large bodies of water, staying away from heavily developed areas. In winter, it can be in dry, open uplands if there is access to open water for foraging. There are no forested areas on or adjacent to the project site, and the project site does not support open water for foraging. Therefore, the bald eagle is not expected to occur on site. The bald eagle was not reported to the databases searched within 1 mile of the project site.

No raptor records, including for the raptors addressed above, were returned in the results of the database searches that were conducted. Because the project site is small, surrounded by existing development, and only supports grassland habitat, other less-sensitive (i.e., State watch list) raptor species that occur in San Bernardino County are also not likely to utilize the site. These species include Cooper's hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), and ferruginous hawk (*Buteo regalis*).

Potential Jurisdictional Features

The NHD and NWI did not return results for any potential jurisdictional features on the project site. No wetland or non-wetland features that have potential to be considered WUS or WS under the jurisdiction of the Corps, CDFW, and/or State Water Resources Control Board were observed on site. The project site is essentially flat and does not support any aquatic features necessary for the development of these resources.

Nesting Birds

The federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (sections 3503 and 3513) provide for protection of birds during the avian nesting season. A number of avian species were observed or detected during the site surveys (Attachment B), and there is the possibility that some could nest there.

Wildlife Corridors

A wildlife corridor is a feature of the landscape that provides habitat connectivity and allows for species movement or dispersal. Corridors provide animals with access to resources such as food, water, and shelter and provide movement opportunities between large areas of habitat that allow for gene flow among populations. Corridors may include, for example, creeks, rivers, ridges, valleys, and other areas of undeveloped land.

The project site is surrounded by existing development including industrial buildings to the south and east, a fenced landfill to the west, and a fenced wastewater treatment plant to north (Figure 2). The project site is a fragment of habitat that remains in otherwise developed surroundings. It does not, therefore, provide a corridor for wildlife movement that connects habitat areas because there are no habitat areas around it to connect.

PROJECT IMPACTS

Potential impacts from development of the project on biological resources are presented below.

Vegetation Communities and Land Cover

The project would impact 16.9 acres of non-native grassland, 1.1 acres of disturbed habitat, and 0.3 acre of developed land—none of which is considered sensitive (Table 2). Therefore, no significant impacts to vegetation communities/land cover would occur.

Table 2 IMPACTS TO VEGETATION COMMUNITIES/LAND COVER ON THE PROJECT SITE				
Vegetation Communities/ Land Cover	Existing Acres on the Project Site	Impacts within the Property Boundary	Off-site Impacts	Total Impacts
Non-native grassland	16.9	16.6	0.3	16.9
Disturbed habitat	1.1	1.1	<0.1 ¹	1.1
Developed	0.3	0.0	0.3	0.3
TOTAL	18.3	17.7	0.6	18.3

¹ Acreage rounded up to tenths

Sensitive Plant Species

No sensitive plant species were found, and none are expected on site; therefore, no impacts to sensitive plant species would occur.

Sensitive Animal Species

Based on the focused survey for the species (Attachment D) the site is not occupied by the burrowing owl. Therefore, no impacts to this species are anticipated to occur. However, the burrowing owl could occupy the site prior to construction. The CDFW and County will require a 30-day pre-construction survey to determine if the burrowing owl has moved onto the site. If the owl is observed or owl use of the site detected, then implementation of avoidance and minimization measures and/or a burrow exclusion and closure program may need to be implemented as approved by the CDFW and County.

There is potential for the coastal (tiger) whiptail to be impacted by habitat removal and potential injury or mortality during construction. While the impacts would be adverse, they would be less than significant because the site (and the surrounding area) does not support the species' typical habitats, so the population on the project site is likely very small, and the species is not highly sensitive (e.g., not State- or federal-listed as threatened or endangered). Therefore, no mitigation would be required.

While not expected to occur, there is low potential for the coast horned lizard to be impacted by habitat removal and potential injury or mortality during construction. While the impacts would be adverse, they would be less than significant because the site (and the surrounding area) does not support the species' typical habitats and the primary food source (harvester ants) was not observed on the site. If present, the population on the project site would likely be very small, and the species is not highly sensitive (e.g., not State- or federal-listed as threatened or endangered). Therefore, no mitigation would be required.

No impacts are anticipated to the American peregrine falcon from the project as this species is associated with the water treatment plant north of the project site and is not using the site for nesting because there is no suitable nesting substrate (e.g., cliff ledge) available.

Potential Jurisdictional Features

No potential WUS or WS occur on site. Therefore, there would be no impacts to these types of features, and the project would not require Corps, CDFW, or State Water Resources Control Board permits.

Nesting Birds

If project construction is to occur during the avian nesting season (February 15 – September 1), significant impacts to nesting birds could occur. Therefore, a pre-construction nesting bird survey should be conducted by a qualified biologist to ensure that no impacts to nesting birds occur.

The nesting bird survey should be completed within 3 days prior to the commencement of any construction activities including vegetation removal or other ground-disturbing activities. If active nests are found, they should be avoided, and appropriate no-impact buffer zones (determined by a qualified biologist) should be established and maintained/monitored until after the young have fledged and are no longer dependent on the nest as determined by a qualified biologist.

Wildlife Corridors

The project site does not function as a corridor for wildlife movement, so the project would not affect wildlife movement.

CONCLUSION

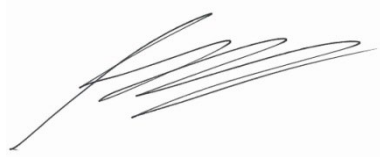
The project would not impact sensitive vegetation or sensitive plant species as none are present on the project site. It would not impact potential jurisdictional resources since none are present.

The project would not impact sensitive animal species, with the possible exceptions of the burrowing owl, coastal (tiger) whiptail, and the coast horned lizard, nor would it impact wildlife movement. There could be impacts to nesting birds should construction occur during the avian nesting season (February 15 – September 1).

Potential impacts to the burrowing owl and nesting birds would be significant. Avoidance of construction during the breeding season or implementation of a pre-construction burrowing owl/nesting bird survey and implementing any associated required measures, as necessary, would reduce potential impacts to those resources to less-than-significant levels. Potential impacts to the coastal (tiger) whiptail and the coast horned lizard would be less than significant, and no mitigation would be required.

Please contact me if you have any questions regarding this letter report.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Mason", is shown within a light gray rectangular box.

Greg Mason
Senior Biologist

Attachments:

- A – Plant Species Observed
- B – Animal Species Observed or Detected
- C – Representative Photographs
- D – Burrowing Owl Survey Report

References:

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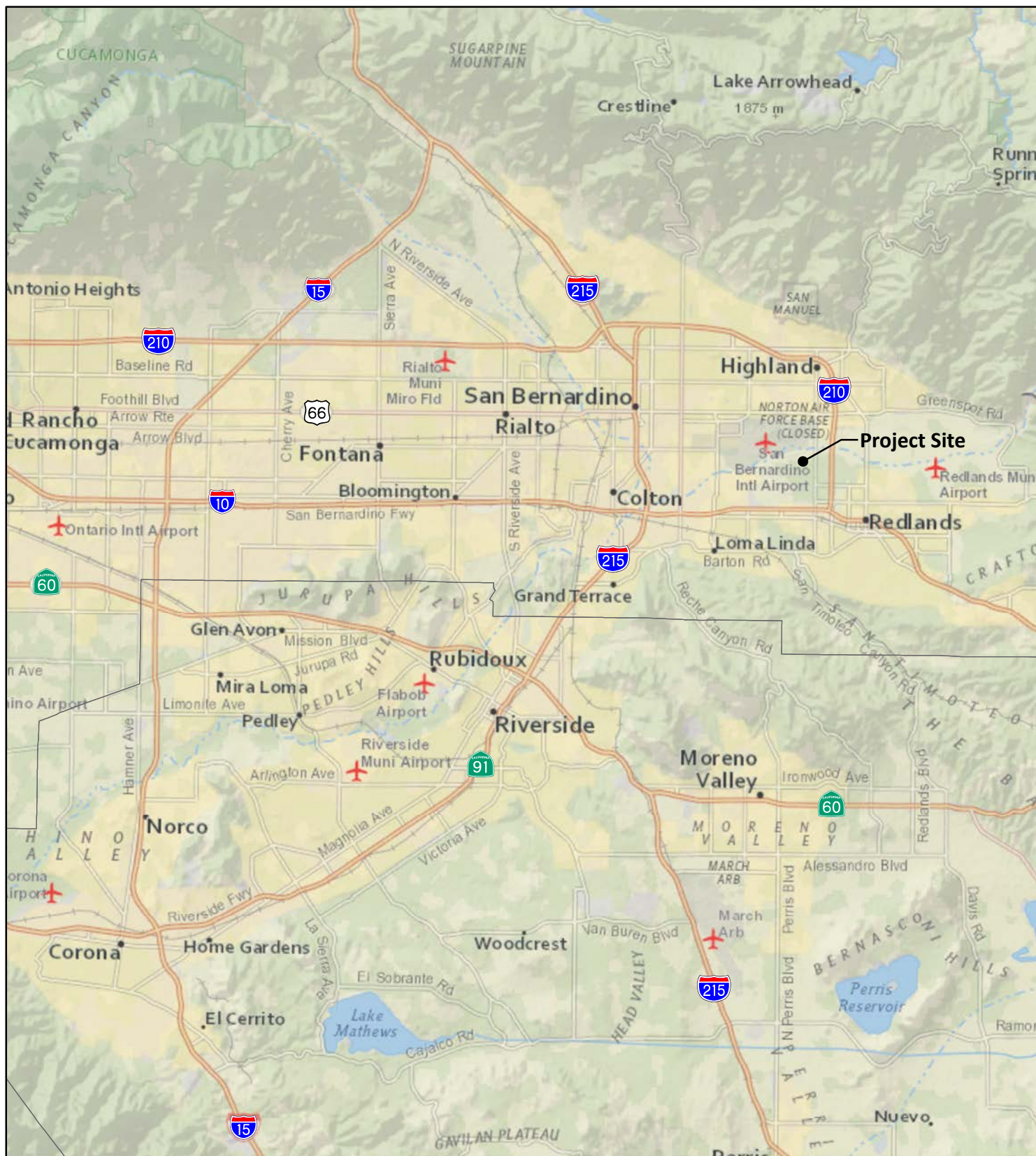
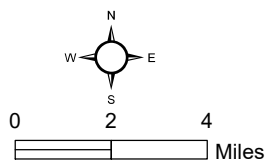


Figure 1

Regional Location

NEVADA STREET INDUSTRIAL



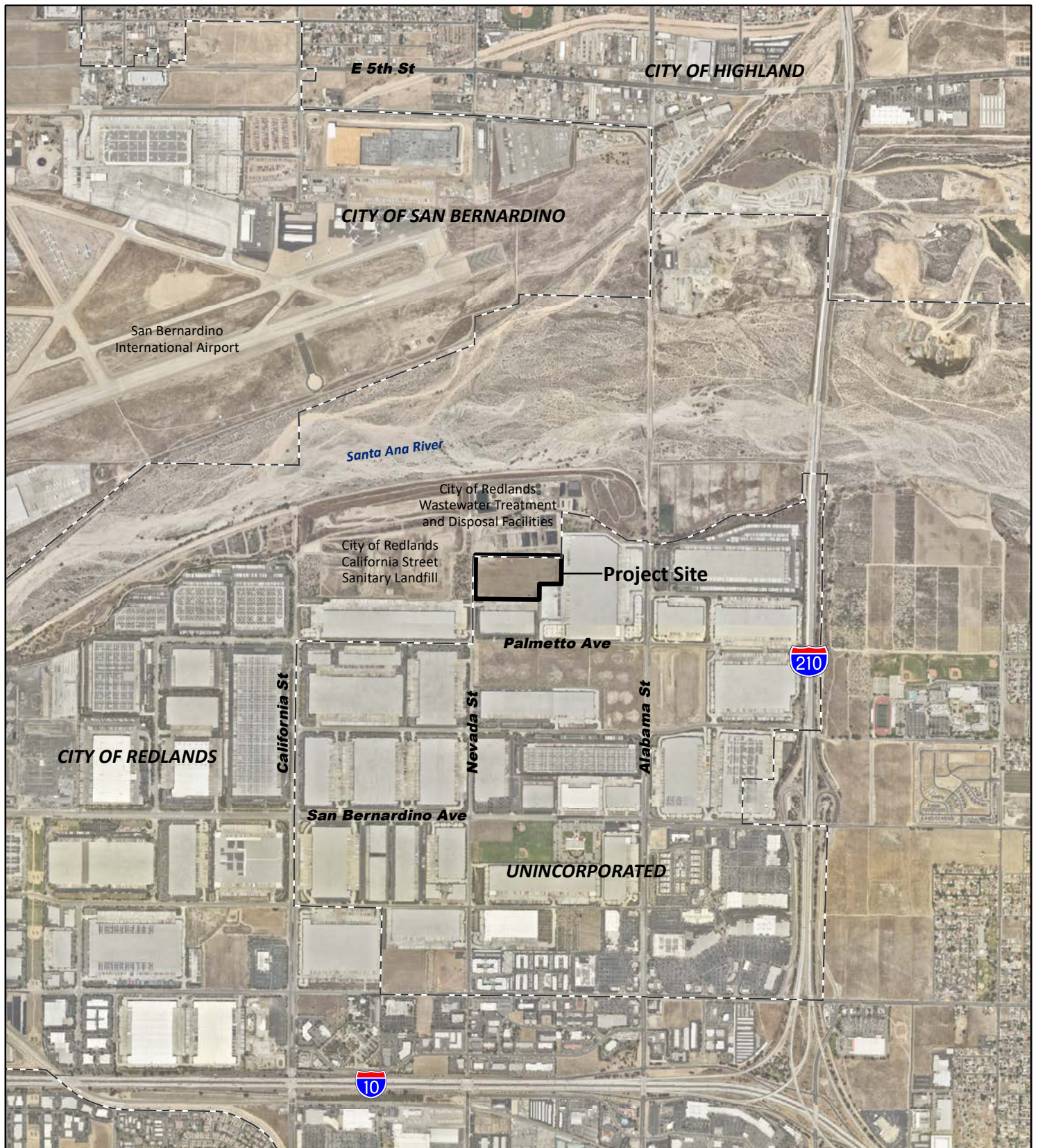
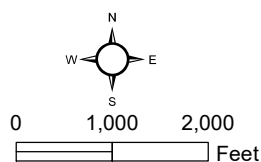


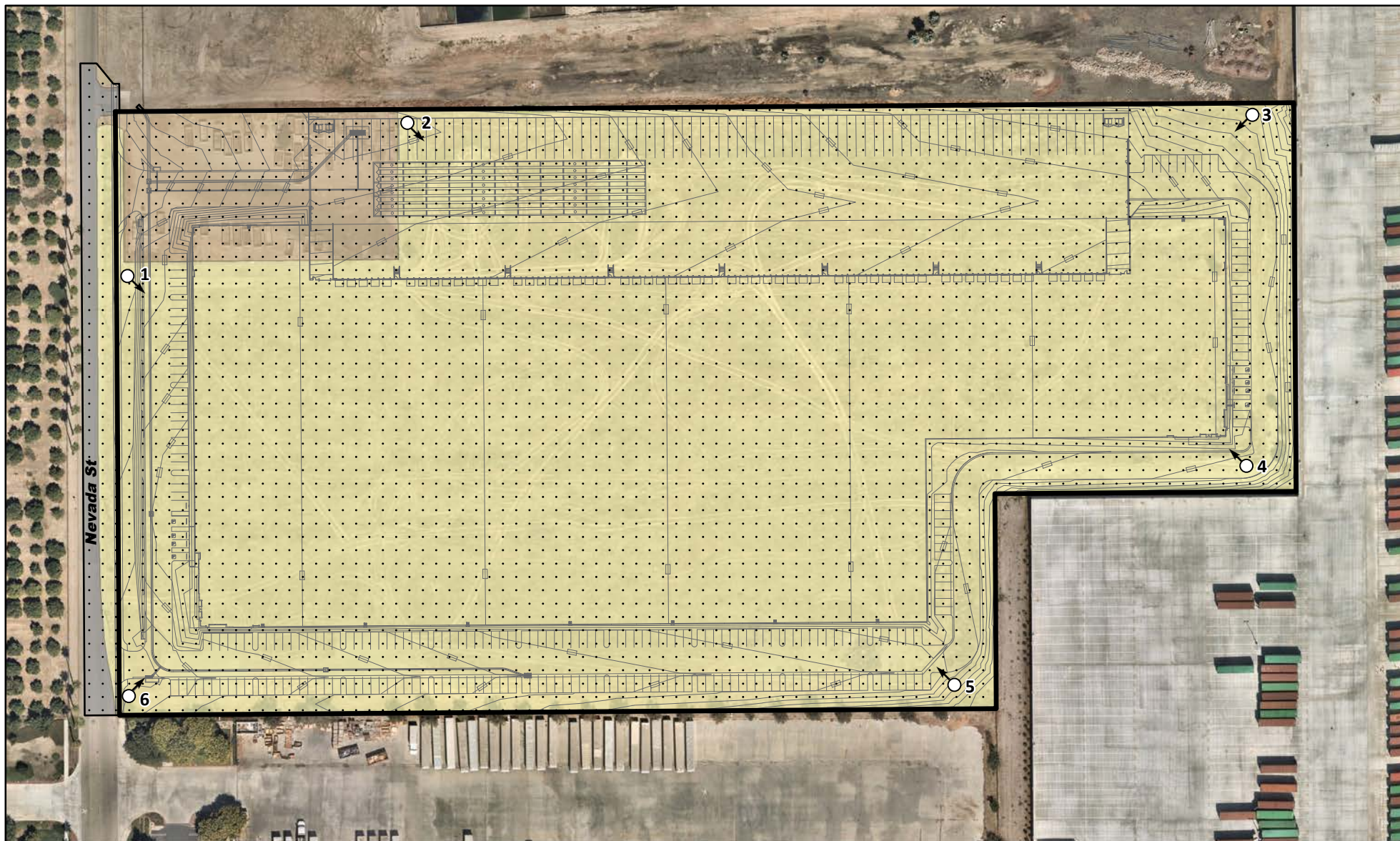
Figure 2

Project Location

NEVADA STREET INDUSTRIAL



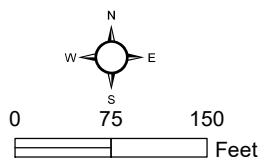
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- Property Boundary
- Project Impacts
- Photo Location

Vegetation

- Non-native Grassland
- Disturbed Habitat
- Developed



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Figure 3

Biological Resources

NEVADA STREET INDUSTRIAL

ATTACHMENT A PLANT SPECIES OBSERVED

<u>FAMILY</u>	<u>SCIENTIFIC NAME</u>	<u>COMMON NAME</u>
ANGIOSPERMS – MONOCOTS		
Arecaceae	<i>Washingtonia robusta</i> ¹	Mexican fan palm
Cyperaceae	<i>Cyperus eragrostis</i>	tall flatsedge
Poaceae	<i>Bromus diandrus</i> ¹	ripgut grass
	<i>Bromus hordeaceus</i> ¹	soft chess
	<i>Bromus rubens</i> ¹	red brome
	<i>Cynodon dactylon</i> ¹	Bermuda grass
	<i>Hordeum murinum</i> var. <i>leporinum</i> ¹	hare barley
	<i>Schismus barbatus</i> ¹	Mediterranean schismus
	<i>Sorghum halepense</i> ¹	Johnson grass
	<i>Stipa miliacea</i> var. <i>miliacea</i> ¹	smilo grass
ANGIOSPERMS – DICOTS		
Asteraceae	<i>Baccharis salicifolia</i>	mule fat
	<i>Erigeron bonariensis</i> ¹	flax-leaved horseweed
	<i>Heterotheca grandiflora</i>	telegraph weed
	<i>Oncosiphon piluliferum</i> ¹	stinknet
Boraginaceae	<i>Amsinckia</i> sp.	rigid fiddleneck
	<i>Heliotropium curassavicum</i> var. <i>oculatum</i>	salt heliotrope
Brassicaceae	<i>Brassica tournefortii</i> ¹	Sahara mustard
	<i>Hirschfeldia incana</i> ¹	shortpod mustard
	<i>Sisymbrium orientale</i> ¹	hare's ear cabbage
Chenopodiaceae	<i>Chenopodium album</i> ¹	lamb's quarters
	<i>Salsola tragus</i> ¹	Russian thistle
Euphorbiaceae	<i>Ricinus communis</i> ¹	castor bean
Fabaceae	<i>Melilotus alba</i> ¹	white sweet clover
Geraniaceae	<i>Erodium cicutarium</i> ¹	red-stem filaree
Malvaceae	<i>Malva parviflora</i> ¹	cheeseweed
Polygonaceae	<i>Polygonum arenastrum</i> ¹	common knotweed
Rosaceae	<i>Prunus</i> sp. ¹	peach or nectarine tree
Solanaceae	<i>Nicotiana glauca</i> ¹	Tree tobacco
Tamaricaceae	<i>Tamarix ramosissima</i> ¹	tamarisk
Urticaceae	<i>Urtica urens</i> ¹	dwarf nettle
Vitaceae	<i>Vitis</i> sp.	ornamental grape

¹Non-native species.

ATTACHMENT B
ANIMAL SPECIES OBSERVED OR DETECTED

SCIENTIFIC NAME

COMMON NAME

Reptiles

*Aspidoscelis tigris stejnegeri*²
Sceloporus occidentalis
Uta stansburiana

coastal (tiger) whiptail
western fence lizard
common side-blotched lizard

Birds

Agelaius phoeniceus
Anas platyrhynchos
Anthus rubescens
Buteo lineatus
Buteo jamaicensis
Calypte anna
Carpodacus mexicanus
Cathartes aura
Charadrius vociferus
Colaptes auratus
*Columba livia*¹
Corvus brachyrhynchos
Corvus corax
Euphagus cyanocephalus
*Falco peregrinus anatum*²
Falco sparverius
Hirundo rustica
Icterus cucullatus
Melospiza crissalis
Melospiza melodia
Mimus polyglottos
Passerculus sandwichensis
Petrochelidon pyrrhonota
Sayornis nigricans
Sayornis saya
Setophaga coronata
Spatula cyanoptera
Stelgidopteryx serripennis
*Streptopelia decaocto*¹
Sturnella neglecta
*Sturnus vulgaris*¹
Thryomanes bewickii
Tyrannus vociferans
Zenaida macroura
Zonotrichia leucophrys

red-winged blackbird
mallard
American pipit
red-shouldered hawk
red-tailed hawk
Anna's hummingbird
house finch
turkey vulture
killdeer
northern flicker
rock pigeon
American crow
common raven
Brewer's blackbird
American peregrine falcon
American kestrel
barn swallow
hooded oriole
California towhee
song sparrow
northern mockingbird
savannah sparrow
cliff swallow
black phoebe
Say's phoebe
yellow-rumped warbler
cinnamon teal
northern rough-winged swallow
Eurasian collared-dove
western meadowlark
European starling
Bewick's wren
Cassin's kingbird
mourning dove
white-crowned sparrow

ATTACHMENT B (continued)
ANIMAL SPECIES OBSERVED OR DETECTED

SCIENTIFIC NAME

COMMON NAME

Mammals

Canis latrans

coyote (scat, tracks)

Otospermophilus beecheyi

California ground squirrel

Sylvilagus audubonii

desert cottontail

Thomomys bottae

Botta's pocket gopher

¹Non-native species

²Sensitive species

ATTACHMENT C- REPRESENTATIVE PHOTOGRAPHS



Photo Point 1. 12/12/21



Photo Point 2. 12/12/21



Photo Point 3. 12/12/21



Photo Point 4. 12/12/21



Photo Point 5. 12/12/21



Photo Point 6. 12/12/21

ATTACHMENT D

BURROWING OWL SURVEY REPORT

July 19, 2022

Mr. David Ornelas
T&B Planning, Inc.
3200 El Camino Real, Ste.100
Irvine, CA 92602

Subject: Burrowing Owl Survey Report for the Nevada Street Industrial Project

Dear Mr. Ornelas:

This letter presents the results of the 2022 breeding season survey for the burrowing owl (*Athene cunicularia*) conducted on the approximately 17.7-acre Nevada Street Industrial project property (project site).

LOCATION AND SITE DESCRIPTION

The project site is located along Nevada Street in the County of San Bernardino (County; Figures 1 and 2). The project site is located on unsectioned land in Township 1 South, Range 3 West of the U.S. Geological Survey Redlands 7.5-minute quadrangle. The project site formerly supported agricultural operations but now supports non-native grassland and disturbed habitat.

METHODS

A general site assessment for burrowing owl habitat was conducted by biologists Brian & Sandy Leatherman on December 12, 2021. During the assessment the vegetation on the site was mapped and locations of California ground squirrel (*Otospermophilus beecheyi*) that could be utilized by burrowing owls were recorded with the use of a Global Positioning System. Focused burrowing owl surveys (4 total) were initiated on February 21, 2022 (Table 1; Attachment A) according to the survey methods in the Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game [CDFG] 2012). Representative photographs also were taken and are included as Attachment B.

Table 1 Burrowing Owl Survey Information				
Site Visit Number	Date	Biologist	Time	Weather Conditions¹ (start/stop)
1	2/21/22	Brian Leatherman, John Simon-Parent	0630-0930	100%, 56°F, wind 0-1 mph/ 90%, 63°F, wind 0-1 mph
2	5/5/22	Brian Leatherman, Emilee Brink	0600-0900	clear, 56°F, 0-2 mph/ clear, 72°F, 0-1 mph
3	6/9/22	Brian Leatherman, Luis DeAnda	0545-0845	clear, 66°F, 0-1 mph/ clear, 74°F, 2-4 mph
4	6/30/22	Brian Leatherman, Luis DeAnda	0530-0800	10%, 65°F, 0-1 mph/ clear, 79°F, 0-1 mph

¹Percentages indicate cloud cover.

Potential burrowing owl habitat on site (i.e., non-native grassland; Figure 3) was surveyed for the burrowing owl by walking line transects spaced approximately 10 meters apart across the site. At the start of each transect and at approximately every 100 meters, the entire visible project area was scanned for burrowing owls using binoculars. The entire site was also surveyed for potential burrows or perches that could be used by the owl. Particular attention was paid to areas of California ground squirrel activity including the squirrel burrow complexes noted in December 2021. Determination of owl presence is made by direct owl observation or by owl signs such as, but not necessarily limited to, excavated soil, whitewash (excrement), castings (pellets), and/or feathers.

SURVEY RESULTS

Almost the entire site supports non-native grassland, which is potential burrowing owl habitat. California ground squirrels also occupy the site and 9 burrow complexes with potential to be used by the burrowing owl were found on site (Figure 3). However, no burrowing owl or burrowing owl sign/evidence was observed during any of the 4 site visits. Based on the negative results of the survey, the site is not considered occupied by the burrowing owl.

Please contact me if you have any questions.

Sincerely,



Greg Mason
Senior Biologist

Enclosures:

Figure 1	Regional Location Map
Figure 2	Project Location Map
Figure 3	Burrowing Owl Survey Results
Attachment A	Field Notes
Attachment B	Representative Photographs

References:

California Department of Fish and Game (CDFG). 2012. Staff Report on Burrowing Owl Mitigation. March 17.

1995. Environmental Services Division. Staff Report on Burrowing Owl Mitigation. October 17. 8pp. plus attachments.

California Burrowing Owl Consortium. 1993. Burrowing Owl Survey Protocol and Mitigation Guidelines. April.

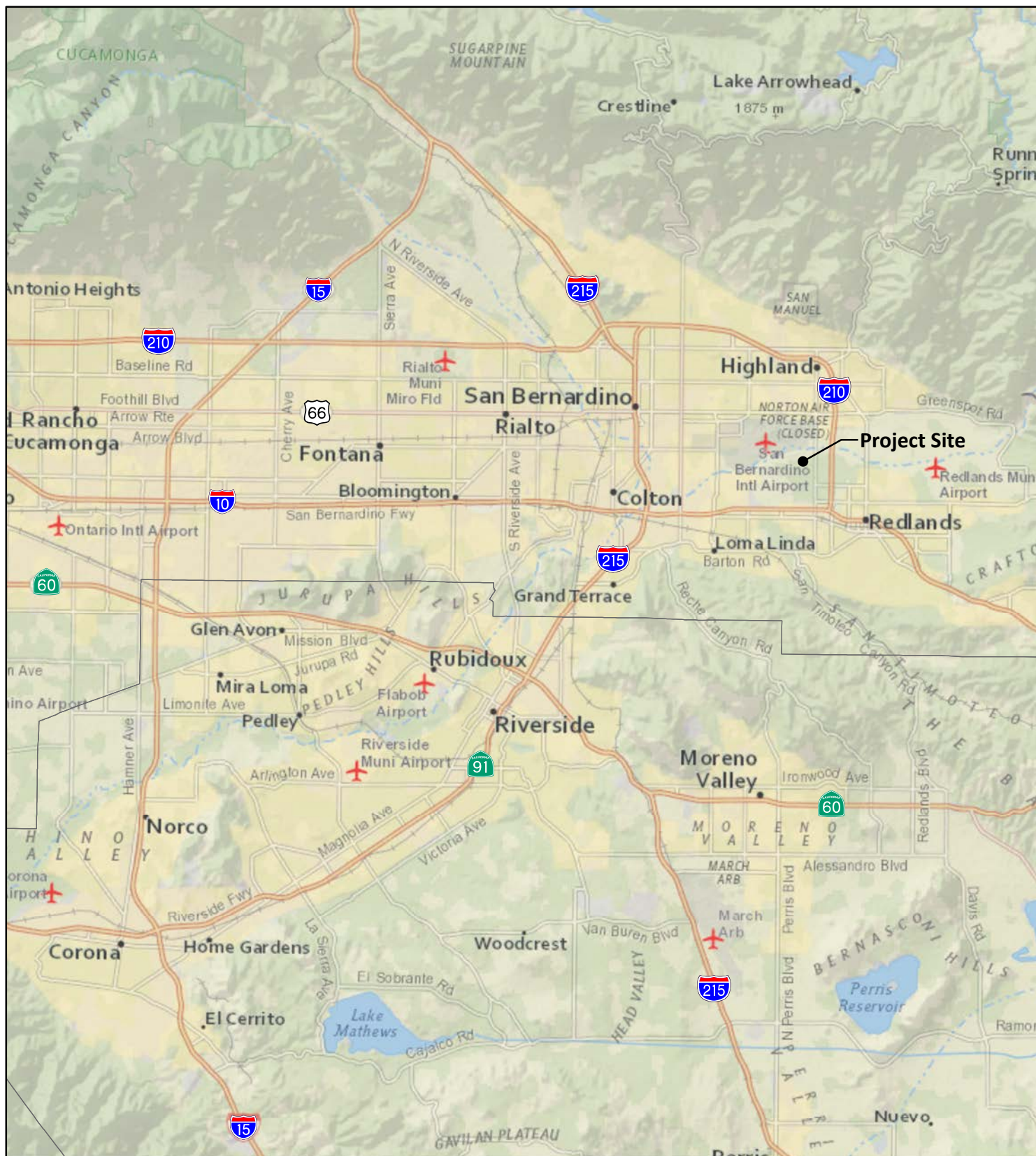
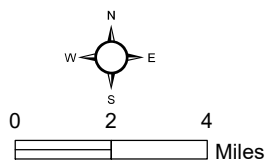


Figure 1

Regional Location

NEVADA STREET INDUSTRIAL



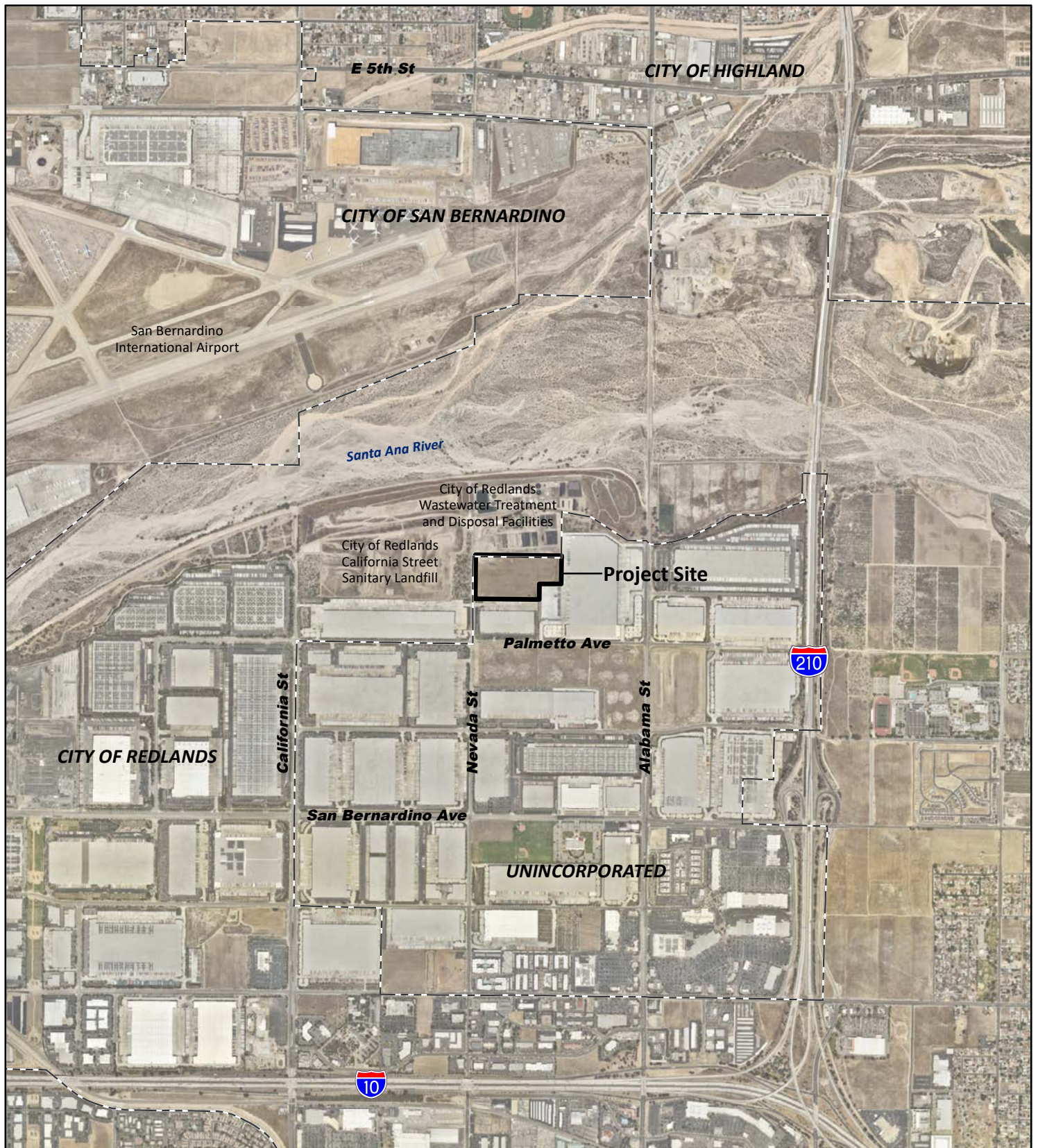
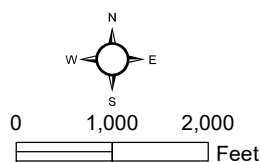


Figure 2

Project Location

NEVADA STREET INDUSTRIAL



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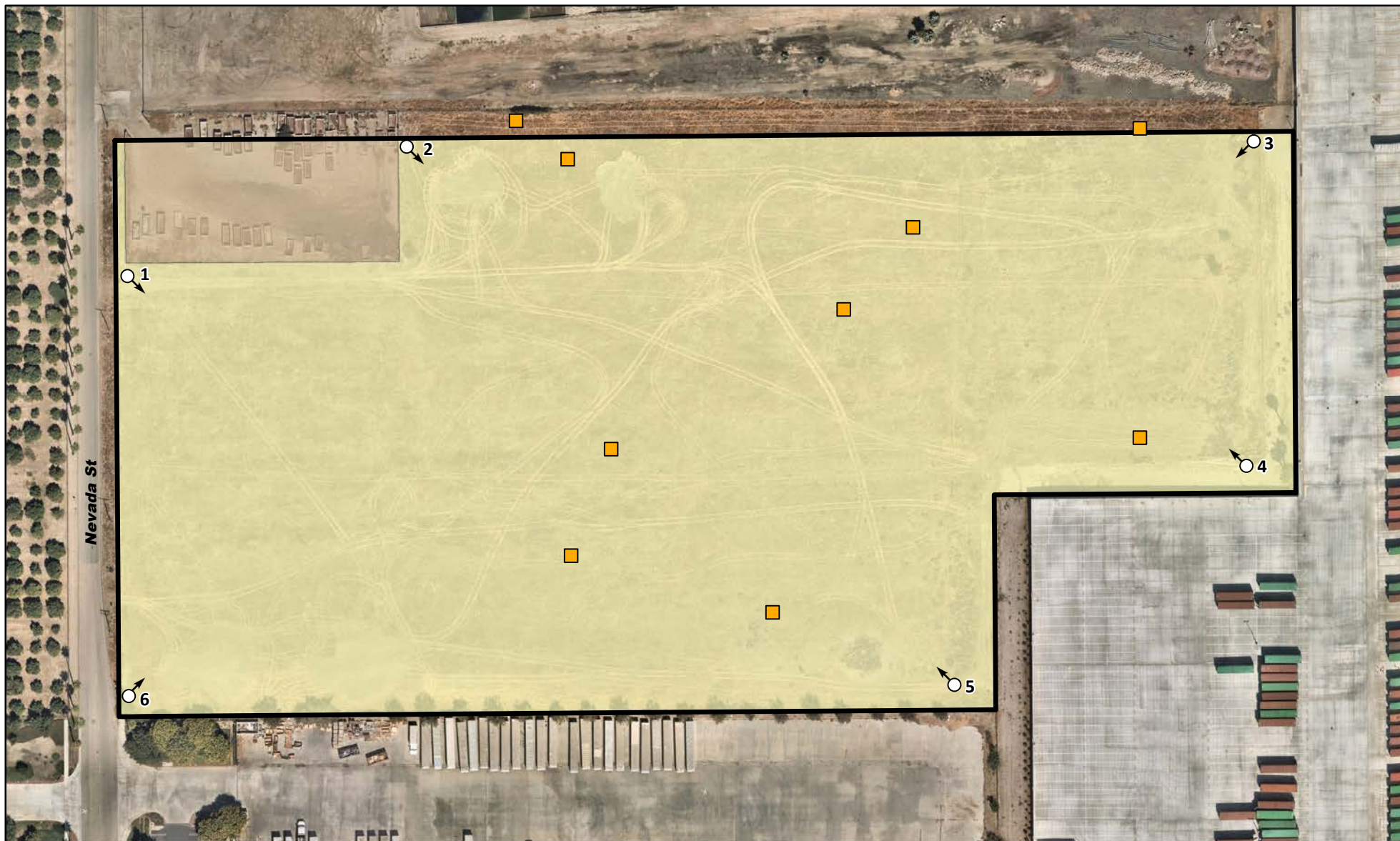


Figure 3

Burrowing Owl Survey Results

NEVADA STREET INDUSTRIAL

ATTACHMENT A

FIELD NOTES

21 February 2022 Nevada Indigo
Wendover St, San Bernardino County
Redlands, CA. 0630 Temp =

56°F, 0-1 mph breeze, 100%
overcast, Brown survey #1, very
light mist at start

HDFI, BEWR, CARI, AMPI, SAVSP,
RTHA, AMCR, MALL, NORH, CITE,
WCSP, ANHM, BRBL, ROPI, BLPN,
SPERBEE, THOMBOTT - burrows, KILL
ENST, ELDO, MODO, RSIA, COAA,
SOSP, CALT, YRNA, PEFA, RWBL,
0930 Temp = 63°F, 90% cloudy,
0-1 mph breeze. No Brown or
sign observed.

5 May 2022 Nevada Industrial
Site, Tedlands area, San Bernardino
County CA 0600 / Temp = 56°F
0-2 mph, clear. Buow Survey # 2
w/ Emilee. BLDH, HOFI, EUST,
SPERBEEC, RTHA, CORA, AMCK,
CHYT, SAPH, CLWS, NEWS, HOOR,
CAKI, CANILATR - tracks, ASP16, TUM
0900. Temp = 71°F, 0-1 mph, clear
No Buow or sign.

9 June 2022 Nevada St. Indus.
 Redlands, Riverside County CA
 0545 Tail = 66°F, 0-1 mph, clear
 Conducting. Busw #3 w/ Lins.

HOFI, AMCR, KILL, RTHA, EAST
 BEWK, MODO, HOOK, CANICATR from
 ANHU, SPERBEEC - GRIFFIN, GFS,
 TITOMROFI, CLSW, COTA, NRS,
 0845 Tail = 74°F, clear, 2-4
 mph breeze, NO BLOW

30 June 2022 Nevada Industrial
 Highlands, San Bernardino County CA
 0530 Tair = 66°F , 1070 covered,
 0-1 mph breeze. Buow #9

HOOR, BEWR, CORA, MODO, CAKI,
 HOPI, CANI LATE - sigt,

NB1 - small complex of occupied
 , SPERBEEC burrows suitable for
 Buow.

NB2 - 3 burrows occupied by SPERBEEC
 AMCR, ROPI, SYLVANDU, KILL, AMKE

NB3, NB4 - along N. fence, NB5, NB6,
 NB7, NB8 - photo, NB9, NB10 - berm,
 BARS, BLPH, UTA STA, NOND, R. U. det.
 NB11, NB12, NB13 - berm,

0800 Tair = 79°F , clear, 0-1 mph
 No Buow - took new wpts.

ATTACHMENT B- REPRESENTATIVE PHOTOGRAPHS



Photo Point 1. 12/12/21



Photo Point 2. 12/12/21



Photo Point 3. 12/12/21



Photo Point 4. 12/12/21



Photo Point 5. 12/12/21



Photo Point 6. 12/12/21