ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

June 7, 2017
(2014-132.004)

Ms. Erin Opliger
County of San Bernardino
Special Districts Department
157 West Fifth Street, Second Floor
San Bernardino, CA 92415

Subject: Results of a Biological Resources Survey for the Proposed Fleet Services Center in Victorville, San Bernardino County, California

Dear Ms. Opliger:

This letter report presents the results of the biological resources survey that was conducted by ECORP Consulting, Inc. (ECORP) for the proposed fleet services center for the County of San Bernardino Special Districts Department (project site). The project site is located in Victorville, San Bernardino County, California. A summary of the reconnaissance-level site visit and associated literature review used to characterize the biological resources on site is included in this letter report. The biological resources survey was conducted on March 23, 2017, and prior to the site visit, a review of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Data Base (CNDDB) and the California Native Plant Society (CNPS) Online Electronic Inventory was conducted. This letter report includes a summary of the findings for the approximately 4.8-acre project site and a brief discussion of additional biological surveys that are recommended to continue the environmental review process.

Site Description and Location

The County of San Bernardino (County) proposes to construct a 23,643-square-foot fleet services building on 4.8 acres of undeveloped and commercially zoned land located northeast of Tokay Street, east of the intersection of Tokay Street and Cottonwood Avenue in the City of Victorville, San Bernardino, California (Figure 1). The 4.8-acre building site is proposed within the northern portion of a 5.25-acre lot created by a lot line adjustment to APN 3093-251-01. Fleet service activities are currently conducted in the City of Hesperia, approximately 4 miles from the proposed project site. The County wishes to consolidate its services and relocate to the proposed site, which would result in an estimated 0.5-mile reduction in average trip length for onsite staff and fleet vehicles.

The complete facility would include a fleet services building, a 34-stall parking lot, and a retention basin. Minor street improvements, including widening and re-shaping, would also be made along Cottonwood Avenue and Tokay Street. No onsite fuel storage or vehicle washing facilities would be included in the project. Total construction for the Proposed Project is estimated to take six months, including two weeks of site preparation and two weeks of earthwork. Earthwork would require 8,305 cubic yards of cut and 9,144 cubic yards of fill placement. Staging of construction equipment would occur onsite.

Location: N:\2014\2014-132.004 SB Special Districts Victorville\MAPS\Location_Vicinity\VicinityMap_20170410.mxd (JL)-jlotta 4/10/2017

Map Date: 4/10/2017

Service Layer Credits: Sources: Esri, USGS, NOAA

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Figure 1. Project Vicinity

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Once constructed, the Proposed Project would employ 7 fulltime employees during normal working hours. In addition to employees commuting to the services center, there would be an estimated 25 fleet vehicle visits to the site daily. The fleet consists of approximately 70 percent light duty vehicles and approximately 30 percent heavy duty vehicles. Vehicles would access the site from Tokay Street, via Cottonwood Ave via Bear Valley Road; and Tokay Street, via Cottonwood Ave via Mariposa Road via Nisqualli Road.

The project site is approximately 0.5 mile east of Interstate 15 (Barstow freeway) and 2 miles south of State Route 18 (Figure 2). The project site is located within the northwestern portion of the U.S. Geological Survey (USGS) Hesperia 7.5-minute topographic quadrangle in Section 31, Township 5 North, Range 4 West. Elevation at the site is approximately 3,060 feet above mean sea level.

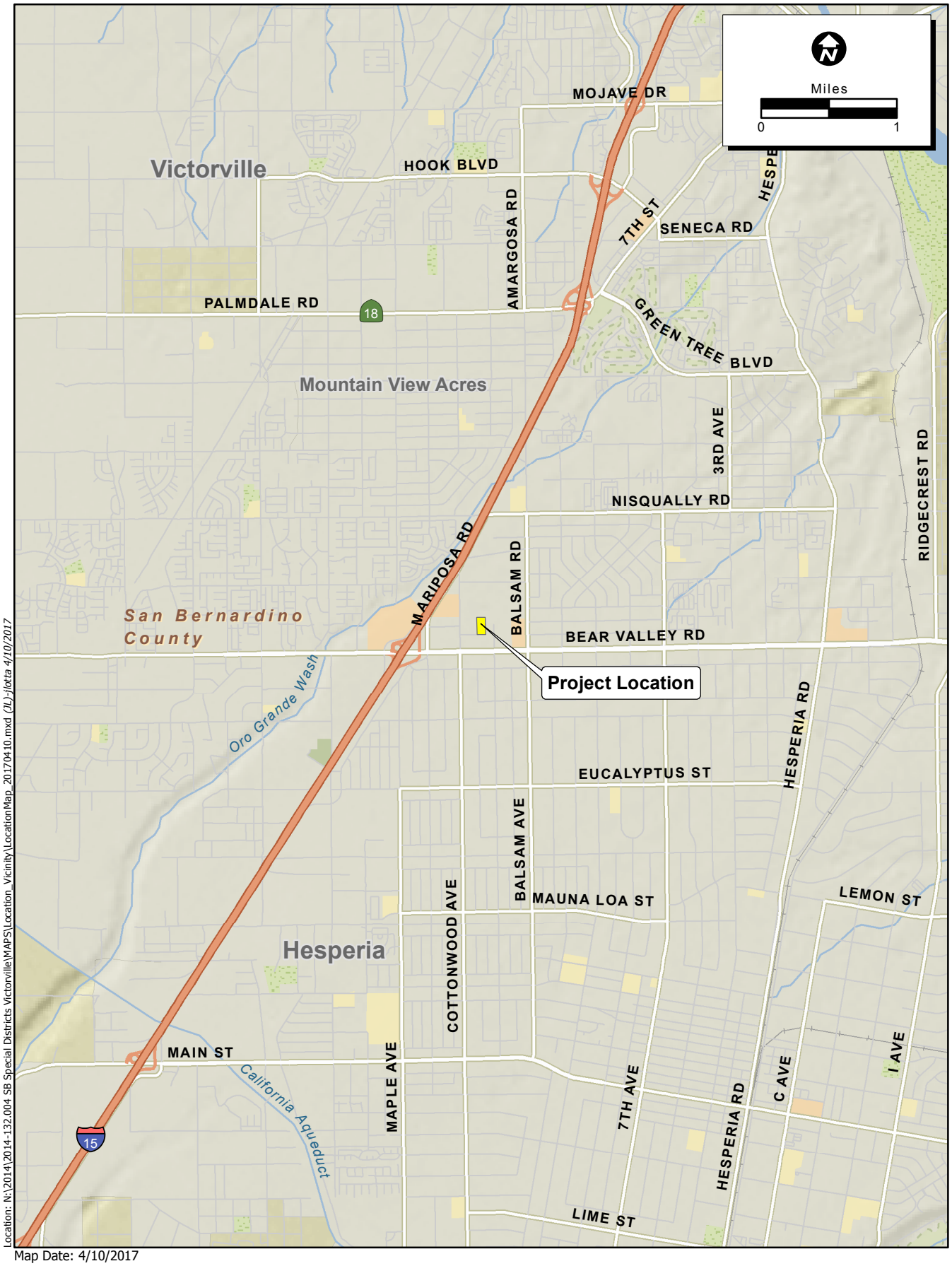
The project site is bounded by commercial development to the east and southwest. Open space surrounds the project site to the north, west, and south.

METHODS

Survey Methodology

Prior to conducting the biological resources survey, a literature review and database search was performed. A search of the CDFW CNDDB (CDFW 2017a) and CNPS's Electronic Inventory of Rare and Endangered Vascular Plants of California (CNPS 2017) was conducted to determine the special-status species that have been documented within the Hesperia quadrangle and the surrounding quadrangles within a 5-mile radius of the project site: Adelanto, Apple Valley North, Apple Valley South, Baldy Mesa, and Victorville.

The site visit was conducted by ECORP biologist Jonathan Renard. Mr. Renard has extensive experience in the high desert conducting focused surveys for a variety of sensitive species, including burrowing owl (*Athene cunicularia*) and desert tortoise (*Gopherus agassizii*). The biological resources survey was performed by walking the entire project site to determine what vegetation communities and wildlife habitats were present. The location and condition of the site were assessed for the potential to provide habitat for special-status plant and wildlife species (including bat species), as well as the potential for the site to be used as a movement corridor for wildlife moving throughout the region. In addition, the presence of drainages, stream courses, and/or other water features that may fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE) and/or CDFW was documented by the biologist.



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Map Date: 4/10/2017
Source: ESRI

Figure 2. Project Location

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Jurisdictional Delineation

This wetland delineation was conducted in accordance with the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Arid West Region Supplement) (USACE 2008). The boundaries of potential Waters of the U.S. were delineated through aerial photograph interpretation and standard field methods [e.g. ordinary high water mark (OHWM) identification]. A color aerial photograph (1"=50' scale, NAIP 2012) and online sources (Google Earth and HistoricAerials.com) were used to assist with mapping. The Web Soil Survey (NRCS 2017) was consulted to aid in identifying hydric soils that might be present. The Jepson Manual, 2nd Edition (Baldwin et al. 2012) was used for plant nomenclature and identification. The biologist walked the entire project site to determine the location and extent of potential Waters of the U.S. and Waters of the State within the survey area. The total width and length of waters within the site was recorded in the field onto aerial mapping.

RESULTS

The reconnaissance-level site visit was conducted on March 23, 2017 from 11:15 am to 1:30 pm. Weather conditions during the survey were mild, with light winds, no cloud cover, and temperatures ranging from 53 to 58 degrees Fahrenheit.

Jurisdictional Water Features

One drainage feature (ephemeral stream) running from southwest to northeast was observed on the project site. The drainage feature currently appears to receive stormwater flows originating from the supermarket development southwest of the project site and running down Tokay Road. Review of historic aerial photographs shows that a very narrow channel was discernable in this location in 1968, approximately when development to the west had begun.

Currently the drainage feature conveys stormwater flows through the project site in a northeast direction onto Locust Avenue and from there through a series of overland flows and flows through culverts, enters the Mojave River. The Mojave River is defined by the USACE as a de facto jurisdictional water of the U.S. Therefore, the drainage feature within the project site is potentially jurisdictional to the USACE as a water of the U.S., because of its connectivity downstream. Figure 3 shows the southern extent of the drainage, Figure 4 shows the location of the drainage within the site, and Figure 5 shows the drainage from the northern boundary of the site.

Because this drainage feature is potentially under the jurisdiction of the USACE, it is also jurisdictional to the Regional Water Quality Control Board (RWQCB) pursuant to the Clean Water Act (CWA) Section 401. The total acreage and linear feet of this features that is jurisdictional to the USACE and RWQCB is 0.03 acre and 743 linear feet. No USACE wetlands were found within the project site.

Because the CDFW has a broader criteria for what it constitutes a jurisdictional features, and CDFW jurisdiction overlaps USACE jurisdiction, the drainage feature is considered CDFW jurisdictional (non-vegetated streambed) pursuant to California Fish and Game Code 1600 (Lake and Streambed Alteration Program). The total acreage and linear feet of this features that is jurisdictional to the CDFW is 0.07 acre and 743 linear feet. No riparian vegetation associated with the drainage feature was observed on the project site.

These acreages represent a calculated estimation of the jurisdictional area within the project site and are subject to modification following the USACE review and/or verification process. The placement of dredged or fill material into jurisdictional features would require a permit pursuant to Section 404 of the CWA and certification or waiver in compliance with Section 401 of the CWA. The areas mapped would also be considered state jurisdiction, under California Fish and Game Code Section 1600, as non-vegetated streambed. Alteration of the ephemeral stream would necessitate a Lake or Streambed Alteration Agreement with the CDFW.

Figure 3. Drainage located at southwest corner of the site

Location: N:\2014\2014-132.004 SB Special Districts Victorville\MAPS\Meeting_Maps_and_Analysis\2017-04-11 Potentially Jurisdictional Drainage\Potential_JD_Drainage_20170411.mxd *(JL)-jlotta 4/11/2017*

Map Date: 4/11/2017
Base Source: NAIP 2012

Figure 4. Potentially Jurisdictional Drainage

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Figure 5. Drainage as seen from northern boundary of site (looking south)

Existing Vegetation Communities

The entire project site consisted of creosote bush scrub that was heavily disturbed by trash dumping, unauthorized off-highway vehicle (OHV) use, and the presence of a large homeless encampment. Creosote bush scrub is a desert scrub community that generally consists of relatively open stands of the dominant shrub, creosote bush (*Larrea tridentata*). This community usually occurs in desert areas on well-drained, sandy soils occurring below 4,000 feet above mean sea level. Plant species that were associated with this vegetation community on the project site included Nevada joint fir (*Ephedra nevandensis*), peach thorn (*Lycium cooperi*), rubber rabbitbrush (*Ericameria nauseosa*), Joshua tree (*Yucca brevifolia*), California buckwheat (*Eriogonum californica*), desert dandelion (*Malacothrix glabrata*), common fiddleneck (*Amsinckia intermedia*), and several non-native annual species (*Bromus* spp., *Brassica* spp.). Figure 6 shows a representative photograph of this community within the project site.

The project site also contained patches of disturbed land that were mostly void of vegetation due to trash dumping and unauthorized OHV use. An active and large homeless encampment was present in the northwestern corner of the project site. Soils on site were sandy and gravelly, with a fair amount of compaction in areas due to OHV use. Figures 7 and 8 show evidence of the disturbances observed within the project site. Attachment A contains representative site photographs and Attachment B contains a complete list of plant species observed on the project site.

Figure 6. Representative photograph of disturbed creosote bush scrub on site

Figure 7. Photograph of trash dumping and an active homeless encampment on project site

Figure 8. Dumping on the project site consisting of trash and asphalt spoils.

Existing Wildlife Population

Wildlife species observed and detected on the project site were characteristic of disturbed creosote bush scrub habitat and urban development in the region. One mammal species was detected on the project site, California ground squirrel (*Otospermophilus beecheyi*); however, other rodent species, coyote (*Canis latrans*), black-tailed jackrabbit (*Lepus californicus*), and desert cottontail (*Sylvilagus audubonii*) are expected to occur. Three bird species were also detected on the project site, including rock pigeon (*Columba livia*), common raven (*Corvus corax*), and California gull (*Larus californicus*). Other common bird species expected to occur include Anna's hummingbird (*Calypte anna*), house finch (*Haemorhous mexicanus*), and house sparrow (*Passer domesticus*). Although not observed on site, reptile species expected to occur include side-blotched lizard (*Uta stansburiana*), gopher snake (*Pituophis catenifer*), and Mojave green rattlesnake (*Crotalus scutulatus*). Due to the high level of human activity in the area and the disturbed nature of the project site, the property represented relative low quality habitat for most wildlife species.

Wildlife Movement Corridors

During the field survey the project site was assessed for its ability to facilitate wildlife movement and for the presence of wildlife corridors. A wildlife corridor is defined as a linear landscape element which serves as a linkage between historically connected habitats/natural areas, and is

meant to facilitate movement between these natural areas (Beier and Loe 1992). The project site provides wildlife movement opportunities due to the fact that it is open. However, it is not situated along any major drainages or washes that would be considered movement corridors for wildlife. The dirt roads running along the borders and within the site are likely utilized by wildlife moving through the area but these features would not be considered necessary linkages between conserved natural habitat areas. The fact that the project site is relatively isolated by development also reduces its ability to facilitate wildlife movement through the area.

Potential Occurrence of Sensitive Plant Species

A total of 11 plant species appeared in the literature search (CDFW 2017a; CNPS 2017), but due to the highly disturbed nature of the project site, the lack of suitable habitat, and/or the lack of recent documented occurrences in the area, all of these species are presumed absent (Table 2).

Table 2. Sensitive Plant Species Recorded in the Vicinity

Plant Species	CNPS List	Federal Status	State Status	Potential to Occur on the Project Site
pinyon rockcress *Boechera dispar*	2B.3	None	None	Presumed Absent
white pygmy-poppy *Canbya candida*	4.2	None	None	Presumed Absent
desert cymopterus *Cymopterus deserticola*	1B.2	None	None	Presumed Absent
Mojave monkeyflower *Diplacus mohavensis*	1B.2	None	None	Presumed Absent
San Bernardino Mountains dudleya *Dudleya abramsii* ssp. *affinis*	1B.2	None	None	Presumed Absent
Booth's evening-primrose *Eremothera boothii ssp. boothii*	2B.3	None	None	Presumed Absent
sagebrush loeflingia *Loeflingia squarrosa* var. *artemisiarum*	2B.2	None	None	Presumed Absent
short-joint beavertail *Opuntia basilaris* var. *brachyclada*	1B.2	None	None	Presumed Absent
Beaver Dam breadroot *Pediomelum castoreum*	1B.2	None	None	Presumed Absent
Southern mountains skullcap *Scutellaria bolanderi* ssp. *austromotana*	1B.2	None	None	Presumed Absent
San Bernardino aster *Symphyotrichum defoliatum*	1B.2	None	None	Presumed Absent

California Native Plant Society (CNPS) Designations:
- **1A:** Plants presumed extinct in California.
- **1B:** Plants rare and endangered in CA and throughout their range.
- **2:** Plants rare, threatened, or endangered in CA but more common elsewhere in their range.
- **3:** Plants about which need more information; a review list.
- **4:** Plants of limited distribution; a watch list.

Plants 1B, 2, and 4 extension meanings:
- **.1** Seriously endangered in CA (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 CA (<20% of occurrences threatened or no current threats known)

City of Victorville Joshua Tree Ordinance

Several Joshua trees were present on the project site. The City of Victorville (City) has a Joshua tree protection ordinance that protects Joshua trees on undeveloped land (Ordinance Number 1224; Municipal Code Chapter 13.33). If the project will result in impacts to any Joshua trees on site, then approval must be obtained from the City prior to removal of the trees. Prior to seeking City approval, a Joshua tree inventory will need to be conducted to document the size, location, and general health of all Joshua trees that will be affected by the project. The Joshua trees must either be transplanted to another area on site, transplanted off site, or placed for adoption.

Potential Occurrence of Sensitive Wildlife Species

A review of the CDFW CNDDB was performed before the survey was conducted to determine whether special-status species have been previously reported in the area (CDFW 2017a). A total of 28 wildlife species appeared in the literature search, but based on the high level of disturbance on the project site and the presence of the large homeless encampment, many of these species are presumed to be absent from the project site. Additionally, with the Mojave River less than five miles east of the project and within the database search radius, many of the species that appeared in the database search occur in habitats associated with riparian habitat and are also presumed absent. However, the project site does provide habitat for one species, burrowing owl (*Athene cunicularia*), and marginally suitable habitat for four of the 28 species, including desert tortoise (*Gopherus agassizii*), loggerhead shrike (*Lanius ludovicianus*), American badger (*Taxidea taxus*), and desert kit fox (*Vulpes macrotis*) (Table 3).

Table 3. Sensitive Wildlife Species Recorded in the Vicinity

Wildlife Species	Federal Status	State Status	Potential to Occur on the Project Site
tricolored blackbird *Agelaius tricolor*	None	SSC	Presumed Absent
arroyo toad *Anaxyrus californicus*	Endangered	SSC	Presumed Absent
golden eagle Aquila chrysaetos	None	Fully Protected	Presumed Absent
long-eared owl *Asio otus*	None	SSC	Presumed Absent
burrowing owl *Athene cunicularia*	None	SSC	**Moderate**
Swainson's hawk *Buteo swainsoni*	None	Threatened	Presumed Absent
pallid San Diego pocket mouse *Chaetodipus fallax pallidus*	None	SSC	Presumed Absent
northern harrier *Circus cyaneus*	None	SSC	Presumed Absent
Western yellow-billed cuckoo *Coccyzus americanus occidentalis*	Threatened	Endangered	Presumed Absent

Wildlife Species	Federal Status	State Status	Potential to Occur on the Project Site
Townsend's big-eared bat *Corynorhinus townsendii*	None	Candidate Threatened	Presumed Absent
Southwestern willow flycatcher *Empidonax traillii extimus*	Endangered	Endangered	Presumed Absent
Western pond turtle *Emys marmorata*	None	SSC	Presumed Absent
desert tortoise *Gopherus agassizii*	Threatened	Threatened	**Low**
yellow-breasted chat *Icteria virens*	None	SSC	Presumed Absent
loggerhead shrike *Lanius ludovicianus*	None	SSC	**Low**
Mohave river vole *Microtus californicus mohavensis*	None	SSC	Presumed Absent
coast horned lizard *Phrynosoma blainvillii*	None	SSC	Presumed Absent
summer tanager *Piranga rubra*	None	SSC	Presumed Absent
California red-legged frog *Rana draytonii*	Threatened	SSC	Presumed Absent
yellow warbler *Setophaga petechia*	None	SSC	Presumed Absent
Mohave tui chub *Siphateles bicolor mohavensis*	Endangered	Endangered and Fully Protected	Presumed Absent
American badger *Taxidea taxus*	None	SSC	**Low**
Le Conte's Thrasher *Toxostoma lecontei*	None	SSC	Presumed Absent*
least Bell's vireo *Vireo bellii pusillus*	Endangered	Endangered	Presumed Absent
gray vireo *Vireo vicinior*	None	SSC	Presumed Absent
desert kit fox *Vulpes macrotis*	None	Fur-bearing Mammal	**Low**
Mojave fringe-toed lizard *Uma inornata*	None	SSC	Presumed Absent
Mohave ground squirrel *Xerospermophilus mohavensis*	None	Threatened	Presumed Absent
SSC – CDFW Species of Special Concern			

*The SSC designation for Le Conte's thrasher is for the San Joaquin population, *Toxostoma lecontei macmillanorum*, not the Mojave Desert population (CDFW 2017b).

Burrowing Owl

Burrowing owls prefer habitat that includes open, sparsely vegetated scrublands and grasslands. Burrowing owls are often documented occupying abandoned mammal burrows, and can be associated with the presence of California ground squirrel (*Otospermophilus beecheyi*) colonies. Although the creosote bush scrub habitat on site is disturbed, it provides suitable habitat for burrowing owl. Several burrows that were of suitable size and shape for burrowing owls were identified within the project site; however, no burrowing owl sign (pellets, whitewash, feathers) was observed at any of the potential burrows on site. Several California ground squirrel burrow colonies were also observed on site. The literature review identified multiple records of recent burrowing owl observations within 5 miles of the project site (CDFW 2017a). Although burrowing owls and sign of burrowing owl (whitewash, pellets, prey remains, feathers) were not identified during the survey, the project site provides suitable burrowing owl habitat. Therefore, this species has been given a moderate potential to occur on the project site.

Desert Tortoise

Habitat present on site for desert tortoise was considered marginal due to the extensive amount of disturbances present and the nearby urban development. There were no burrows of suitable size or shape to support desert tortoise observed during the site visit. The closest documented observation of live tortoises was located approximately 5 miles northwest of the project site (CNDDB Occurrence Number 51), where a subadult tortoise was observed in August of 2007 and two adult tortoises were observed in June and July 2003 (CDFW 2017a). Due to the degraded nature of the habitat on site, the desert tortoise was given a low potential to occur on the project site.

Mohave Ground Squirrel

Although the project site is located within the historic range of Mohave ground squirrel, the project site does not support suitable habitat for Mohave ground squirrel. The habitat on site is very degraded and the high levels of human activity preclude this species from occurring on the site. Furthermore, most of the records in the immediate vicinity of the project site are over 35 years old (CDFW 2017a). One record, documented in 2005, was identified approximately 5 miles southwest of the project site (CNDDB Occurrence Number 318; CDFW 2017a), but due to lack of suitable habitat on the project site, and the fact that the project site is largely cut off from other areas of suitable habitat, this species is presumed absent from the project site.

Loggerhead Shrike

The project site was considered marginally suitable habitat for loggerhead shrike. This species prefers habitat that includes grasslands and open desert areas with scattered trees and shrubs for foraging and nesting. The project site provided suitable foraging and nesting habitat for this species within the disturbed creosote bush scrub; however, the level of disturbance at the site may preclude this species from occurring. Due to the presence of marginally suitable habitat and several documented records within five miles of the project site, this species has been given a low potential for occurrence on the project site.

American Badger and Desert Kit Fox

American badger and desert kit fox were given a low potential to occur on site due to the disturbances present. There were no documented occurrences of American badger and desert kit fox in the vicinity of the site but these species are known to occur in the area. These species are

associated with varying types of desert scrub habitats; however, the presence of OHV use, trash dumping, and the homeless encampment reduce the likelihood of these species occurring on site. Therefore, these species were given a low potential to occur.

Nesting Birds
Suitable nesting habitat for numerous species of migratory birds protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code is present on the project site in some of the dense shrubs, surrounding buildings, and other anthropogenic structures (e.g., telephone poles, billboards, buildings). Therefore, nesting birds could use the project site during the nesting bird season (typically February 15 through August 31).

Bats
Documented observations of sensitive bat species were not found in the database search. The project site does not provide roosting or maternity habitat for sensitive bat species such as the Townsend's big-eared bat (*Corynorhinus townsendii*) nor does it contain maternity roosts for non-sensitive bat species. Bats originating from roosting areas off site may forage across the site within the disturbed creosote bush habitat. Suitable roosting habitat for non-sensitive bat species may be present in the adjacent buildings and landscaping just off site (e.g., under eaves, in cracks or crevices, in ornamental trees), but these areas are not anticipated to be affected by the proposed project.

Discussion

The project site is very disturbed due to trash dumping, OHV use, and the presence of a large homeless encampment. Disturbed creosote bush scrub was the only vegetation community present on site. One drainage running from southwest to northeast was observed on site and appears to be associated with a drain pipe conveying runoff from the parking lot of the supermarket southwest of the project site.

Due to the heavily disturbed nature of the project site, all of the special-status plant and most of the special-status wildlife species identified during the literature review and database search are presumed absent from the project site. One special-status wildlife species (burrowing owl, a CDFW Species of Special Concern [SSC]) was determined to have a moderate potential to occur due to the presence of suitable habitat and several documented occurrences of this species within five miles of the project site (CDFW 2017a). The project site provides marginally suitable habitat for desert tortoise (federally and state-listed threatened), loggerhead shrike (SSC), American badger (SSC), and desert kit fox (fur-bearing mammal), and the presence of disturbances and development surrounding the project site reduce the likelihood of these species occurring on the project site. Therefore, these species have been given a low potential to occur on the project site. The project site does not provide suitable habitat for the state-listed (threatened) Mohave ground squirrel, as the project site is heavily disturbed and isolated from other areas of suitable habitat for the species. Therefore, Mohave ground squirrel is presumed absent from the project site.

Several Joshua trees were observed on site. If Joshua trees will be affected by the project, then the Joshua trees will need to be inventoried and the location, size, and general health of each tree will need to be documented. This inventory will need to be submitted to the City prior to

ground-disturbing activities for approval by the City in order to maintain compliance with the City's Joshua tree ordinance (Ordinance Number 1224; Municipal Code Chapter 13.33). The affected Joshua trees will need to be transplanted to another area on site, transplanted off site, or placed for adoption.

Although the project site provides opportunities for wildlife movement throughout the region, the site is not considered a part of a major wildlife corridor. The small drainage and dirt roads likely facilitate wildlife movement, but there are no linkages on site that connect larger natural habitat areas with one another.

The site provides suitable nesting habitat for numerous species of migratory birds protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Impacts to nesting bird species could occur if project activities occur during the nesting bird season (typically February 15 to August 31).

The site does not provide suitable roosting or maternity habitat for sensitive or non-sensitive bat species. Bats originating from roosting areas off site may forage within the disturbed creosote bush habitat on the project site, but impacts to sensitive and non-sensitive bat species are not expected to occur. Additional focused surveys and pre-construction bat surveys are not recommended.

Recommendations

The following actions are recommended prior to project implementation: regulatory permitting; a Joshua tree inventory; a pre-construction survey for desert tortoise and other special-status species; pre-construction surveys for burrowing owl; and a pre-construction survey for nesting birds, including loggerhead shrike, if ground-breaking activities will occur during the nesting bird season (typically February 15 through August 31). Pre-construction surveys for desert tortoise, burrowing owl, American badger and desert kit fox, and nesting birds and the Joshua tree inventory can be combined as a cost savings measure.

- **Regulatory Permitting:** Prior to the construction of any component of the project that will impact the jurisdictional drainage on the project site, authorization for impacts shall be acquired through the permitting process from the USACE, RWQCB, and CDFW pursuant to the CWA Section 404 and 401 and California Fish and Game Code Section 1600, respectively. Project specific mitigation for impacts to features jurisdictional to state and federal agencies will be determined during the permitting process. Mitigation could include land conservation and management in perpetuity, on-site habitat enhancement and restoration, payment of in-lieu fees to authorized conservation organizations, or a combination of these measures.

- **Joshua Tree Inventory:** A Joshua tree inventory should be conducted to document the location, height, diameter, and general health of the Joshua trees that may be affected by the project. An arborist or qualified biologist should conduct the inventory and make recommendations on the Joshua tree specimens that are healthy enough for transplanting or adopting activities. Following the inventory, the report will need to be presented to the City for approval prior to receiving a grading permit for the project. Due to the low number of Joshua trees observed on site during the reconnaissance survey, this inventory can be

conducted concurrently with the 14-30-day burrowing owl pre-construction survey (described below)

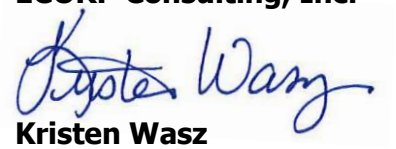
- **Pre-construction Survey for Desert Tortoise and Other Special-Status Species:** The project site provides low quality habitat for desert tortoise; therefore, a pre-construction survey for desert tortoise is recommended. Survey methods should follow those outlined in *Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise* (USFWS 2010). During the survey, biologists will document observations of other sensitive species, such as American badger and desert kit fox. If desert tortoises or desert tortoise sign (e.g., burrows, carcasses, scat) are observed on or immediately adjacent to the project site, then coordination with USFWS and CDFW will need to occur. If impacts to the desert tortoise will occur from the project, then permits will need to be obtained prior to the start of project activities. The pre-construction desert tortoise survey should take place no more than 14 days prior to construction. This survey can be conducted concurrently with the 14-30-day or the 24-hour pre-construction burrowing owl survey (described below).

- **Pre-construction Surveys for Burrowing Owl:** Pre-construction surveys for burrowing owl are recommended. The surveys should follow the methods described in the CDFW's *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). Two surveys should be conducted, with the first survey being scheduled between 30 and 14 days before initial ground disturbance (grading, grubbing, and/or construction), and the second survey being conducted no more than 24 hours prior to initial ground disturbance. If burrowing owls or occupied burrowing owl burrows are identified on the project site during the survey, the project should consult with CDFW and follow the methods listed in the CDFW's *Staff Report on Burrowing Owl Mitigation* (CDFW 2012) for avoidance and/or passive relocation. If burrowing owls are found to be present on site, then CDFW may require the preparation of a burrowing owl management plan, which typically includes project-specific details on burrowing owl exclusion methods, burrow site monitoring, burrow excavation, and/or creation of artificial burrows.

- **Pre-construction Nesting Bird Survey**: If construction or other project activities are scheduled to occur during the bird breeding season (February 15 through August 31), a pre-construction nesting bird survey should be conducted by a qualified biologist. The survey will focus on detecting nesting birds protected by the MBTA, including loggerhead shrike, on or immediately adjacent to the site. The survey should be completed no more than 3 days prior to initial ground disturbance. The nesting bird survey should include the project site and adjacent areas where project activities have the potential to cause nest failure. If an active nest is identified, a qualified biologist should establish an appropriately-sized no-work buffer around the nest using flagging or staking. Construction activities will need to be avoided within no-work buffer zones until the nest is deemed no longer active by the biologist. If project activities are scheduled during the nesting bird season, then this survey can be conducted concurrently with the 24-hour pre-construction survey for burrowing owl.

Thank you for the opportunity to work on your project. If you have any questions regarding the contents of this letter report, please contact me at (909) 307-0046.

Sincerely,
ECORP Consulting, Inc.



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Attachment 1: Representative Site Photographs
Attachment 2: Plant Species Compendium

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ATTACHMENT 1

Representative Site Photographs

Photo 1: Southwest corner looking toward the center of the project site.

Photo 2: Active homeless encampment near the eastern edge of the project site.

Photo 3: Potential burrowing owl burrow (no sign)

Photo 4: Potential burrowing owl burrow (no sign)

ATTACHMENT 2

PLANT SPECIES LIST

SCIENTIFIC NAME	COMMON NAME
Amsinckia intermedia	common fiddleneck
Brassica nigra	black mustard*
Bromus madritensis ssp. *rubens*	red brome*
Bromus tectorum	cheatgrass*
Ericameria nauseosa	rubber rabbitbrush
Eriogonum fasciculatum	California buckwheat
Erodium botrys	longbeak stork's bill*
Erodium cicutarium	red-stemmed filaree*
Ephedra nevadensis	Nevada jointfir
Fraxiunus sp.	ash tree*
Larrea tridentata	creosote bush
Lycium cooperi	peach thorn
Malacothrix glabrata	desert dandelion
Salsola tragus	Russian thistle*
Yucca brevifolia	Joshua tree

*nonnative species