

June 27, 2019

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Jorge Estrada
Placeworks
3 MacArthur Place, Suite 1100
Santa Ana, California 92707

Subject: *Biological Resources Letter Report for the Desert Trails Preparatory Academy Project, City of Victorville, San Bernardino County, California*

Dear Mr. Estrada:

This biological resources letter report describes the existing biological conditions of the proposed Desert Trails Preparatory Academy Project (proposed project). The proposed project and potential impacts to special-status biological resources are analyzed in the context of the California Environmental Quality Act (CEQA).

This biological resources letter report is intended to describe the existing conditions of special-status biological resources on the project site and within a 500-foot buffer where access was granted (study area); quantify impacts to special-status biological resources that would result from implementation of the proposed project and describe those impacts in terms of biological significance under CEQA; and recommend avoidance, minimization, and mitigation measures (MMs) to avoid and reduce impacts to special-status biological resources, if necessary.

1 Project Location and Description

The approximate 8.9-acre project site is comprised of two parcels (Assessor's Parcel Numbers 309-613-6707 and 309-613-6706) located north of Forest Park Lane, east of Mesa View Drive, south of Olivera Road, and west of Bella Pine Street in the City of Victorville, San Bernardino County (County), (Figure 1, Project Location; figures can be found in Attachment A, Figures). The project site occurs within Township 5 North, Range 5 West, Section 28 of the U.S. Geological Survey 7.5-minute Baldy Mesa quadrangle map.

The proposed project involves the construction of a new campus for the Desert Trails Preparatory Academy charter school (Figure 2, Site Plan). The proposed project involves the relocation of the charter school's existing middle school, which currently operates from the combined elementary/middle school campus at 14350 Bellflower Street in the City of Adelanto. The campus will include a building for classrooms, a multipurpose room building, and a building for administration offices. The new campus will also include playfields, hard courts, landscaping, access and circulation improvements, infrastructure improvements, and a parking lot as illustrated on Figure 2. The City's General Plan land use designation for the project site is Low Density Residential. The project site is similarly zoned Single-Family Residential (R-1). As proposed, the charter school is permitted under the City's General Plan land use designation of the project site, and under the R-1 zoning district via City approval of a Conditional Use Permit.

2 Methods

2.1 Literature Review

For this biological resources letter report, “special-status” species are those that are (1) listed, proposed for listing, or candidates for listing as threatened or endangered under the federal Endangered Species Act; (2) listed or candidates for listing as threatened or endangered under the California Endangered Species Act; (3) a state Fully Protected species; (4) a California Department of Fish and Wildlife (CDFW) Species of Special Concern (SSC); or (5) a species listed on the California Native Plant Society’s Inventory of Rare and Endangered Plants with a California Rare Plant Rank (CRPR) of 1B or 2B.

Special-status vegetation communities are those identified as high priority for inventory in the Natural Communities List (CDFW 2018) by a state rarity ranking of S1, S2, or S3, or are considered sensitive by the County Development Code.

Special-status biological resources present or potentially present on the project site were identified through a literature search using the following sources: U.S. Fish and Wildlife Service (USFWS) Critical Habitat and Occurrence Data (USFWS 2019); CDFW’s California Natural Diversity Database (CDFW 2019); the CalFlora database (CalFlora 2019), and the California Native Plant Society’s online Inventory of Rare, Threatened, and Endangered Plants (CNPS 2019). Searches were completed for the following U.S. Geological Survey quadrangles (which includes the quadrangle within which the study area is located and the eight surrounding quadrangles): Baldy Mesa, Shadow Mountains SE, Adelanto, Victorville, Phelan, Hesperia, Telegraph Peak, Cajon, and Silverwood Lake.

2.2 Field Reconnaissance

Dudek Biologist Britney Strittmater conducted a general biological survey of the study area on April 11, 2019, from 10:15 a.m. to 1:30 p.m. The 500-foot buffer was surveyed on foot where it was accessible (bringing the study area acreage to 63.25 acres). The survey was conducted when weather conditions were favorable, with 70% to 90% cloud cover, wind speeds from 2 to 8 miles per hour, and temperatures ranging from 70° Fahrenheit (°F) to 90°F. All native and naturalized plant species encountered within the study area were identified and recorded. The potential for special-status plant and wildlife species to occur within the study area was evaluated based on the vegetation communities, soils present, and surrounding features. Vegetation communities and land covers on site were mapped directly in the field. In addition, an investigation was conducted of the extent and distribution of jurisdictional waters of the United States regulated by the U.S. Army Corps of Engineers, jurisdictional waters of the state regulated by the Regional Water Quality Control Board, and jurisdictional streambed and associated riparian vegetation regulated by CDFW.

Latin and common names for plant species with a CRPR (formerly California Native Plant Society List) follow the California Native Plant Society’s *Inventory of Rare and Endangered Plants* (CNPS 2019). For plant species without a CRPR, Latin names follow the Jepson Interchange List of Currently Accepted Names of Native and Naturalized Plants of California (Jepson Flora Project 2019), and common names follow the California Natural Community list (CDFW 2018) or the U.S. Department of Agriculture Natural Resources Conservation Service Plants Database (USDA 2018). Natural vegetation communities were mapped in the field using the *Manual of California Vegetation*, 2nd Edition

(Sawyer et al. 2009) and Natural Communities List (CDFW 2018a). Land cover types that are not identified in Sawyer et al were described in accordance with *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008). Latin and common names of animals follow Crother (2012) for reptiles and amphibians, the American Ornithological Society (AOS 2018) for birds, Wilson and Reeder (2005) for mammals, the North American Butterfly Association (NABA 2016) for butterflies, and Moyle (2002) for fish.

Dudek used geographic information system software to map biological resources and provide figures.

2.3 Survey Limitations

Access was not available within portions of the 500-foot buffer due to private properties (i.e., single-family residences) within the northern, southern, and western portions of the study area. Therefore, habitat assessments were conducted using binoculars from public roads for inaccessible areas.

2.4 City of Victorville Municipal Code

Chapter 13.33 of the City of Victorville Municipal Code provides regulatory and management guidance for the preservation and removal of Joshua trees within the City of Victorville. The goal is to preserve the unique natural desert environment throughout the City and for the health, safety, and welfare of the community. This code prohibits cutting, damaging, destroying, digging up, or harvesting of Joshua trees without the prior written consent of the Director of Parks and Recreation. A Joshua tree assessment is typically needed to demonstrate compliance with this section of the Municipal Code. The Joshua tree assessment is being conducted by the City of Victorville; therefore, a Joshua tree assessment is not included within this report.

3 Results

3.1 Site Description

The project site is characterized as a vacant lot bound by a dirt road to the north (i.e., Olivera Road), vacant lands to the east, residential development to the south, and Mesa View Drive and residential development to the west. The study area contains a mix of residential development and vacant lands and is surrounded by residential development to the north; a mix of vacant land, residential development and State Route 395 to the east; vacant lands and residential development to the south; and vacant lands to the west. Elevations range from approximately 3,220 to 3,260 feet above mean sea level (amsl). Representative photographs of the project site and study area are included in Attachment B, Site Photographs.

3.2 Soils

One soil type is mapped within the study area: Cajon sand (0% to 2% slopes) (Figure 3, Soils; USDA 2019). The Cajon Series consists of somewhat excessively drained soils formed in allium derived from granite sources. These soils typically occur on alluvial fans and river terraces (USDA 2019).

3.3 Vegetation Communities and Land Covers

One vegetation community and two land cover types are classified for the study area: creosote bush scrub (including disturbed form), disturbed habitat, and urban/developed. Figure 4, Biological Resources, illustrates the distribution of vegetation communities and land covers, and Table 1 provides a summary of acreages for each within the study area.

Table 1. Vegetation Communities and Land Covers within the Study Area

Vegetation Community/Land Cover	Acreage
Vegetation Communities	
Creosote Bush Scrub	28.49
Disturbed Creosote Bush Scrub	2.30
Non-natural Land Covers	
Disturbed Habitat	3.54
Urban/Developed	28.93
Total*	63.25

Note: *Total may not add due to rounding.

3.3.1 Creosote Bush Scrub

The creosote bush scrub alliance contains creosote (*Larrea tridentata*) as the dominant or co-dominant species within the shrub canopy. This community contains an open to intermittent canopy. Emergent trees may be present at a low cover, and the herbaceous layer is variable and may include various grasses and seasonal annuals. This alliance occurs on alluvial fans, bajadas, upland slopes, and intermittent washes on well-drained soils (Sawyer et al. 2009).

Within the study area, this vegetation community is dominated by creosote bush (*Larrea tridentata*). The shrub layer comprises approximately 50% absolute cover, with creosote bush occupying between approximately 45% to 50% absolute cover. Scattered Joshua trees (*Yucca brevifolia*) are present and comprise less than 1% absolute cover. Other shrubs present at low covers include white bursage (*Ambrosia dumosa*) and rubber rabbitbrush (*Ericameria nauseosa*). The herbaceous layer is comprised of non-native grasses such as ripgut brome (*Bromus diandrus*), compact brome (*Bromus madritensis*), cheatgrass (*Bromus tectorum*), mouse barely (*Hordeum murinum*), and common Mediterranean grass (*Schismus barbatus*). Annual forbs within the herbaceous layer included bristly fiddleneck (*Amsinckia tessellata*), needle goldfields (*Lasthenia gracilis*), smooth desertdandelion (*Malacothrix glabrata*), and sandblossoms (*Linanthus parryae*). This vegetation community is located within the central portion of the study area, north and south of Olivera Road, and within the southern portion of the study area, west and east of Mesa View Drive.

Disturbed creosote bush occurs within the southern portion of the study area and is comprised of approximately less than 5% absolute cover of creosote bush. Within the study area, disturbed creosote bush scrub included a higher amount of non-native species cover and anthropogenic disturbances (e.g., trash, tire tracks and vegetation trampling).

3.3.2 Disturbed Habitat

The classification of disturbed habitat is due to the predominance of bare ground, non-native plant species, and other disturbance-tolerant plant species. Oberbauer et al. (2008) describes disturbed habitat as areas that have been physically disturbed by previous human activity and are no longer recognizable as a native or naturalized vegetation association, but that continue to retain a soil substrate. Typically, vegetation, if present, is nearly exclusively composed of non-native annual plant species.

Within the study area, disturbed habitat encompasses Olivera Road and areas of cleared vegetation along the eastern side of Mesa View Drive and immediately south of the housing development south of Forrest Park Lane. While the disturbed habitat within the study area was composed primarily of bare ground, a low cover of plant species observed in the study area within this land cover type include western tansymustard (*Descurainia pinnata*), tall tumbledustard (*Sisymbrium altissimum*), redstem stork's bill (*Erodium cicutarium*), and common Mediterranean grass.

3.3.2 Urban/Developed Land

Urban/developed land is described by Oberbauer (et al. 2008) as areas that have been constructed on or disturbed so severely that native vegetation is no longer supported. Developed land includes areas with permanent or semi-permanent structures, pavement or hardscape, landscaped areas, and areas with a large amount of debris or other materials.

Urban/developed land within the study area includes paved roads and residential development within the northern, western, and southern portions of the study area.

3.4 Floral Diversity

A total of 22 species of native or naturalized plants, 15 native (68%) and 7 non-native (32%), were recorded within the study area. This low plant diversity reflects the study area's small size and its proximity to adjacent developed areas. Plant species observed within the study area are listed in Attachment C, Vascular Plant Species.

3.5 Wildlife

Nine bird species were detected within the study area: house finch (*Haemorhous mexicanus*), red-tailed hawk (*Buteo jamaicensis*), American crow (*Corvus brachyrhynchos*), common raven (*Corvus corax*), northern mockingbird (*Mimus polyglottos*), house sparrow (*Passer domesticus*), mourning dove (*Zenaida macroura*), rock pigeon (*Columba livia*), and European starling (*Sturnus vulgaris*). One active bird nest was observed within the study area during the reconnaissance survey. No amphibian species were observed, and no amphibian species are expected to occur. One reptile species was observed during the survey: common side-blotched lizard (*Uta stansburiana*). Three mammal species were detected during the survey: domestic dog (*Canis lupus familiaris*), California ground squirrel (*Spermophilus (Otospermophilus) beecheyi*), and black-tailed jackrabbit (*Lepus californicus*). One invertebrate species was observed during the survey: painted lady (*Vanessa cardui*). Wildlife species observed within the study area are listed in Attachment D, Wildlife Species.

3.6 Special-Status Plant Species

Attachment E, Special-Status Plant Species Detected or Potentially Occurring in the Study Area, lists special-status plant species that have been documented in the U.S. Geological Survey 7.5-minute Baldy Mesa quadrangle and the eight surrounding quadrangles (CDFW 2019). For each species listed, a determination was made regarding the potential for the species to occur in the study area based on information gathered during the field reconnaissance, including the location of the site, habitats present, current site conditions, and past and present land use. Listed species with a potential to occur and non-listed species with a moderate or higher potential to occur are discussed herein.

No special-status plant species were detected within the study area. No listed special-status plant species are expected to occur within the study area. Three non-listed special-status species, Mojave milkweed (*Asclepias nyctaginifolia*), white-bracted spineflower (*Chorizanthe xanti* var. *leucotheca*), and sagebrush loeflingia (*Symphyotrichum defoliatum*), have moderate potential to occur within the study area.

3.6.1 Mojave Milkweed

Mojave milkweed is CRPR 2B.1 species, indicating that it is seriously endangered in California. This perennial herb blooming period is from May to June. The species is known to occur in Mojavean desert scrub and pinyon and juniper woodland at an elevation range of 2,870 to 5,575 feet amsl (CNPS 2019). The study area is located within this species' known elevation range and contains suitable desert scrub to support the species. The nearest known occurrence is approximately 10 miles south of the study area (CDFW 2019). Therefore, this species has a moderate potential to occur within the study area.

3.6.2 White-bracted Spineflower

White-bracted spineflower is CRPR 1B.1 species indicating that it is fairly endangered in California. This annual herb blooming period is from April to June. The species is known to occur within coastal scrub on alluvial fans, Mojavean desert scrub, and pinyon and juniper woodland on sandy or gravelly soils at an elevation range of 980 to 3,935 feet amsl (CNPS 2019). The study area is located within this species' known elevation range and contains suitable desert scrub and soils to support the species. The nearest known occurrence is approximately 10.4 miles south of the study area (CDFW 2019). Therefore, this species has a moderate potential to occur within the study area.

3.6.3 Sagebrush Loeflingia

Sagebrush loeflingia is CRPR 2B.2 species indicating that it is fairly endangered in California. This annual herb blooming period is from April to May. The species is known to occur on sandy soils within desert dunes, Great Basin Scrub, and Sonoran desert scrub at an elevation range of 2,295 to 5,300 feet amsl (CNPS 2019). The study area is located within this species' known elevation range and contains suitable desert scrub and soils to support the species. The nearest known occurrence is less than one mile south of the study area (CDFW 2019). Therefore, this species has a moderate potential to occur within the study area.

3.7 Special-Status Wildlife Species

Attachment F, Special-Status Wildlife Species Detected or Potentially Occurring in the Study Area, lists special-status wildlife species that have been documented in the U.S. Geological Survey 7.5-minute Baldy Mesa quadrangle and the eight surrounding quadrangles (CDFW 2019). For each species listed, a determination was made regarding potential use of the project site based on information gathered during the field reconnaissance, known habitat preferences, and knowledge of the species' relative distributions in the area. Listed species with a potential to occur and non-listed species with a moderate or higher potential to occur are discussed herein.

No special-status wildlife species were detected within the study area. One federally and state-listed threatened species, the Mojave desert tortoise (*Gopherus agassizii*), has a moderate potential to occur within the study area. One state-listed threatened species, Mohave ground squirrel (*Spermophilus (Xerospermophilus) mohavensis*), has a moderate potential to occur. Four other non-listed species have a moderate potential to occur within the study area: burrowing owl (*Athene cunicularia*), loggerhead shrike (*Lanius ludovicianus*), LeConte's thrasher (*Toxostoma lecontei*), and pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*).

3.7.1 Listed Special-Status Wildlife Species

3.7.1.1 Mojave Desert Tortoise

The Mojave desert tortoise is a federally threatened and state endangered species. Typical habitat for this species within the Mojave Desert is creosote bush scrub with a relatively high diversity of perennial plants. This species typically occurs on gently sloping terrain with sandy gravel soils in locations with sparse cover of low-growing shrubs. Soils must be friable enough for the digging of burrows but firm enough to prevent burrow collapse (USFWS 2011).

Desert tortoises inhabit the Mojave, Colorado, Sonoran, and Sinaloan deserts in the southwestern United States and adjacent Mexico. The desert tortoise has two distinct populations that have been separated for millions of years, with the Sonoran population to the east and south of the Colorado River and the Mojave population to the west and the north of the river. The range of the Mojave population of the desert tortoise includes portions of the Mojave Desert and the Colorado Desert in southern California (parts of Inyo, Kern, Los Angeles, San Bernardino, and Riverside Counties), southern Nevada (Clark, Esmeralda, Nye, and Lincoln Counties), northwestern Arizona (Mohave County), and southwestern Utah (Washington County). DNA analysis of the Mojave population shows a gradation in traits from east to west, and the Mojave population may be further divided into western and eastern subpopulations. The eastern Mojave subpopulation includes tortoises in eastern California, southern Nevada, northwestern Arizona, and Utah; the western Mojave subpopulation extends west of the low sink that runs southward from Death Valley (USFWS 1990).

The study area contains suitable desert scrub habitat dominated by creosote bush scrub. Suitable sandy gravel soils are present, and numerous ground squirrel and rodent burrows were observed. While the project site itself is surrounded by residential development to the north, south, and west, large areas of open, suitable habitat is located within the study area connecting to open lands to west. There are three documented occurrences from 1990 approximately 3 miles northeast of the study area. The next closest occurrence is from 2000 and located approximately 6.2 miles to the south of the study area (CDFW 2019). The study area is within the USFWS designated

Western Mojave Recovery Unit (USFWS 2011) for desert tortoise. Due to the project being located within the range of desert tortoise and the presence of suitable habitat, soils, and potential burrows, there is moderate potential for Mojave desert tortoise to occur within the study area. Mojave desert tortoise Critical Habitat is approximately 13.5 miles north of the study area.

3.7.1.2 Mohave Ground Squirrel

The Mohave ground squirrel is a state-listed threatened species. The Mohave ground squirrel is exclusively found in the northwestern Mojave Desert in San Bernardino, Los Angeles, Kern, and Inyo Counties, and occurs in a variety of desert shrubland habitats. Although most often found in creosote bush scrub, it has also been recorded in desert saltbush scrub, desert sink scrub, desert greasewood scrub, shadscale scrub, Joshua tree woodland, and Mojave mixed woody scrub (Best 1995; 75 FR 22063–22070; MGSWG 2016). Mohave ground squirrel typically occupies areas with open vegetative cover and small bushes (< 0.6 meters [2 feet] in height) spaced approximately 6 to 9 meters (20 to 30 feet) apart and prefers deep, sandy to gravelly soils on flat to moderately sloping terrain (Best 1995; MGSWG 2016).

The study area is within the range of the Mohave ground squirrel and supports suitable habitat for the species. The nearest documented occurrence, approximately 1.6 miles to the northeast, is recorded from 1977 and is documented by the California Natural Diversity Database as extirpated due to development (CDFW 2019). The next nearest occurrence is from 2005, is mapped approximately 2.7 miles south of the study area and is considered extant by the California Natural Diversity Database (CDFW 2019).

3.7.2 Non-listed Special-Status Wildlife Species

3.7.2.1 Burrowing Owl

The burrowing owl is a California SSC. With a relatively wide-ranging distribution throughout the west, burrowing owl is considered a habitat generalist (Lantz et al. 2004). In California, burrowing owl is a yearlong resident of open, dry grassland and desert habitats, and in grass, forb, and open shrub stages of pinyon–juniper and ponderosa pine habitats (Zeiner et al. 1990). Preferred habitat is generally typified by short, sparse vegetation with few shrubs; level to gently sloping topography; and well-drained soils (Haug et al. 1993). The presence of burrows is the most essential component of burrowing owl habitat, as they are required for nesting, roosting, cover, and caching prey. In California, western burrowing owl most commonly lives in burrows created by California ground squirrels. Burrowing owl may occur in human-altered landscapes such as agricultural areas, ruderal grassy fields, vacant lots, and pastures if the vegetation structure is suitable (i.e., open and sparse), useable burrows are available, and foraging habitat is close (Gervais et al. 2008). Debris piles, riprap, culverts, and pipes can also be used for nesting and roosting.

The study area contains suitable open desert habitat to support this species, and California ground squirrel burrows are present within the study area. There are numerous known occurrences within 1 mile of the study area (CDFW 2019). Therefore, this species has a high potential to occur within the study area.

3.7.2.2 Loggerhead Shrike

Loggerhead shrike is an SSC species. Preferred habitats for the loggerhead shrike are open areas that include scattered shrubs, trees, posts, fences, utility lines, or other structures that provide hunting perches with views of open ground, as well as nearby spiny vegetation or man-made structures (such as the top of chain-link fences or barbed wire) that provide a location to impale prey items for storage or manipulation (Humple 2008). Loggerhead shrikes occur most frequently in riparian areas along the woodland edge, grasslands with sufficient perch and butcher sites, scrublands, and open-canopied woodlands, although they can be quite common in agricultural and grazing areas, and can sometimes be found in mowed roadsides, cemeteries, and golf courses. Loggerhead shrikes occur only rarely in heavily urbanized areas. For nesting, the height of shrubs and presence of canopy cover are most important (Yosef 1996).

The study area contains suitable open nesting habitat with scattered shrubs and trees including Joshua trees, which may be used to impale prey items. The nearest known occurrence is approximately 2.5 miles south of the study area (CDFW 2019).

3.7.2.3 LeConte's Thrasher

Le Conte's thrasher is an SSC species. Le Conte's thrasher occurs primarily in open desert wash, desert scrub, alkali desert scrub, and desert succulent shrub habitats, and also occurs in Joshua tree habitat with scattered shrubs (Dobkin and Granholm 2005). This species is known to nest in cactus (*Opuntia* spp.), saltbushes (*Atriplex* spp.), yuccas (including small Joshua trees), and mesquites (*Prosopis* spp.) (Weigand and Fitton 2008).

The study area contains suitable desert scrub and some scattered Joshua trees to support this species. The nearest known occurrence is approximately 2.5 miles northeast of the study area (CDFW 2019).

3.7.2.4 Pallid San Diego Pocket Mouse

Pallid San Diego pocket mouse is an SSC species. This species is known to occur in desert washes, desert scrub, succulent scrub, and pinyon and juniper woodland.

The study area contains suitable desert scrub to support this species. The nearest known occurrence is approximately 5.8 miles northeast of the study area (CDFW 2019).

3.8 Nesting Birds

The project site and study area contain shrubs (i.e., creosote bush) and trees (i.e., Joshua trees) that provide potential habitat for commonly occurring nesting birds, such as northern mockingbird and house finches. One nest was observed within the study area during the survey (Figure 3): a pair of common ravens were observed within a Joshua tree within the western portion of the project site, and the female was observed incubating. No other nests were observed during the survey.

3.9 Wildlife Corridors and Habitat Linkages

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation; they may be continuous habitat or discrete habitat islands that function as stepping stones for wildlife dispersal. Wildlife movement within the project site is not expected as the project site is surrounded by residential development. Areas within the southern portion of the study area likely function as open habitat, but do not function as a corridor for wildlife.

4 Impacts Analysis and Recommendations

This section addresses potential impacts to special-status biological resources that could result from implementation of the proposed project. This section follows the CEQA checklist for biological resources as identified below. For the impacts analysis, the proposed project site plans (i.e., development of the western Assessor's Parcel Number) were overlaid with biological resources (Figure 5, Impacts). This analysis assumes the proposed project would not result in any temporary or off-site impacts. Table 2 summarizes the vegetation communities and land covers and the total area of impact used in the impact analysis.

Table 2. Impacts to Vegetation Communities and Land Covers within the Project Site

Vegetation Community/Land Cover	No Impact (acreage)	Permanent Impact (acreage)
Vegetation Communities		
Creosote Bush Scrub	4.21	3.76
Disturbed Creosote Bush Scrub	–	–
Non-natural Land Covers		
Disturbed Habitat	0.32	0.53
Urban/Developed	0.06	0.02
Total*	4.59	4.31

Note: *Acreage may not total due to rounding.

Significance Thresholds

The following are the significance thresholds for biological resources provided in the CEQA Appendix G Environmental Checklist, which states that project activities could potentially have a significant affect if they:

1. **Impact-BIO-1:** Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS (Threshold BIO-1).
2. **Impact-BIO-2:** Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS (Threshold BIO-2).

3. **Impact-BIO-3:** Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means (Threshold BIO-3).
4. **Impact-BIO-4:** Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites (Threshold BIO-4).
5. **Impact-BIO-5:** Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Threshold BIO-5).
6. **Impact-BIO-6:** Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan (Threshold BIO-6).

4.1 Impact-BIO-1: Special-Status Species

4.1.1 Special-Status Plants

No special-status plant species were detected within the study area; however, three non-listed special-status plant species have a moderate potential to occur within the project site: Mojave milkweed, white-bracted spineflower, and sagebrush loeflingia. Direct or indirect impacts to these species, if present, could occur as a result of the proposed project activities. Potential direct impacts could result in the permanent removal of populations of these species, if present. Indirect impacts to special-status plants include the generation of fugitive dust, the release of chemical pollutants, and the adverse effect of invasive plant species. The study area is comprised of developed areas to the north, south, and west, and State Route 395 and developed areas occur outside the study area to the east. Therefore, potential indirect impacts to special-status plants would be less than significant as they would be limited to the undeveloped parcels immediately adjacent to the project to the north and east. Direct impacts to special-status plants are potentially significant absent mitigation (Impact-BIO-1). Implementation of MM-BIO-1 (Focused Special-Status Plant Surveys) would reduce potential impacts to less than significant.

Joshua trees, protected by the City of Victorville, would be removed as a result of the Project. Impacts to Joshua tree are further discussed under Section 4.5 of this report.

4.1.2 Special-Status Wildlife

One federally listed threatened species (Mojave desert tortoise) and one state-listed threatened species (Mohave ground squirrel), have a moderate potential to occur. In addition, four other non-listed species (burrowing owl, loggerhead shrike, LeConte's thrasher, and pallid San Diego pocket mouse) have a moderate potential to occur within the study area.

The proposed project will permanently impact approximately 3.8 acres of potential habitat for Mojave desert tortoise, Mohave ground squirrel, burrowing owl, loggerhead shrike, LeConte's thrasher, and pallid San Diego pocket mouse. The study area is surrounded on three sides by development and State Route 395 and residential development occurs approximately 0.25 miles to the east. Loss of approximately 3.8 acres of fragmented habitat is less than significant. However, direct mortality of individuals of Mojave desert tortoise and Mohave ground squirrel, and breeding burrowing owl, loggerhead shrike, and LeConte's thrasher would be considered significant absent mitigation (Impact-BIO-1). Implementation of MM-BIO-2, MM-BIO-3, and MM-BIO-4 would reduce potential impacts to less than significant.

4.2 Impact-BIO-2: Riparian and Special Status Vegetation Communities

There are no special-status vegetation communities as defined by CDFW (CDFW 2018) within the project site; therefore, the project would not result in direct or indirect impacts to special-status vegetation communities (Impact-BIO-2).

4.3 Impact-BIO-3: Jurisdictional Waters

No potentially jurisdictional drainage features occur within the study area; therefore, implementation of the proposed project would not result in impacts to these resources (Impact-BIO-3).

4.4 Impact-BIO-4: Migratory Birds and Wildlife Corridor/Nursery Sites

4.4.1 Nesting Birds

Project construction could result in direct and indirect impacts to nesting birds, including the loss of nests, eggs, and fledglings (Impact-BIO-4) if ground-disturbing activities occur during the nesting season (generally February 15 through August 31). Construction activities during this time may result in reduced reproductive success and may violate the federal Migratory Bird Treaty Act and California Fish and Game Code. If construction (including any ground-disturbing activities) occurs during the nesting season, a nesting bird survey must be conducted by a qualified biologist prior to grading activities. If nesting birds are observed within or adjacent to the construction activities, avoidance of active bird nests should occur as determined by the qualified biologist to ensure compliance with these regulations. With implementation of MM-BIO-5 (Nesting Birds), no significant impacts to nesting birds would occur.

4.4.2 Wildlife Corridors and Nursery Sites

The project site currently does not function as a wildlife corridor and does not support any wildlife nursery sites. As a result, implementation of the proposed project would not result in impacts to these resources (Impact-BIO-4).

4.5 Impact-BIO-5: Other Local Ordinances

The proposed project would result in the removal of Joshua trees. Joshua trees are a protected resource under Chapter 13.33 of the City of Victorville Municipal Code (Preservation and Removal of Joshua Trees) and are considered a sensitive biological resource. The Municipal Code requires written consent for the removal of Joshua trees. The City of Victorville will obtain written consent from the Director of Parks and Recreation prior to implementation of the proposed project for the removal of Joshua trees; therefore, the project would not be in conflict with the City of Victorville Preservation and Removal of Joshua Trees Municipal Code.

4.6 Impact-BIO-6: Habitat Conservation Plans

The proposed project overlaps the Desert Renewable Energy Conservation Plan (DRECP), which provides protection and conservation of desert ecosystems while allowing for appropriate development of renewable energy projects. However, while the DRECP plan area overlaps the proposed project site, the DRECP focuses on renewable energy projects and would not be applicable to the proposed project. Therefore, the project would not be in conflict with any habitat conservation plans.

5 Avoidance, Minimization, and Mitigation Measures

MM-BIO-1 Focused Special-Status Plant Surveys

Prior to initiation of construction activities, focused surveys shall be conducted in suitable habitat within the proposed project footprint, including a 100-foot buffer for Mojave milkweed, white-bracted spineflower, and sagebrush loeflingia. Focused surveys shall be conducted by a qualified biologist at the appropriate time of year (May/June) and in appropriate conditions.

Identified populations shall be avoided to the maximum extent practicable. Special-status plants in the vicinity of the project footprint shall be temporarily fenced or prominently flagged and a 50-foot buffer established around the populations to prevent inadvertent encroachment by vehicles and equipment during the activity.

If greater than 10% of a special-status plant population within or adjacent to the project site cannot be avoided, a mitigation plan shall be prepared and implemented prior to impacting the special-status plants. The mitigation plan shall include collection of seeds to be salvaged at a reputable seed bank. The mitigation plan shall detail seed collection methods and proposed seed bank for storage. The plan shall be reviewed and approved by the City of Victorville.

MM-BIO-2 Desert Tortoise

A pre-project survey shall be conducted in accordance with the U.S. Fish and Wildlife Service (USFWS) protocol (USFWS 2017). Based on the USFWS protocol, the proposed project would fall under the small project survey with the purpose of the survey determining whether desert tortoises are likely to be present based primarily on sign; therefore, a pre-project survey can be conducted during at any time of the year.

If the survey is negative, no additional mitigation is required. A worker environmental awareness training shall be conducted with construction personnel to educate them on desert tortoise, protective status, and avoidance measures to be implemented by all personnel, including looking under vehicles and equipment prior to moving. The training shall include steps to be taken should Mojave desert tortoise be observed on the construction site, including ceasing construction activities and coordination with the City and resource agencies.

If the survey is positive, an incidental take permit (ITP) must be obtained from USFWS and the California Department of Fish and Wildlife prior to initiation of construction activities. Occupied habitat shall be mitigated at a minimum 1:1 ratio, or as specified in the ITP. Avoidance and minimization measures shall be implemented in accordance with provisions of the ITP and shall include, at a minimum:

- Presence of a qualified biological monitor during initial grading activities, and as needed, to document compliance with the conditions of the ITP. The biological monitor will have the authority to stop work as needed to avoid direct impact to desert tortoise.
- Should a desert tortoise be found during construction activities, activities shall cease until either the tortoise moves out of harm's way or a qualified biologist authorized under the project's ITP ("authorized biologist") relocates the tortoise.

MM-BIO-3 Mohave Ground Squirrel

A focused Mohave ground squirrel habitat assessment shall be conducted by a permitted Mohave ground squirrel biologist. If the project is determined to be suitable, the year prior to initiation of construction activities, a focused Mohave ground squirrel survey (i.e., trapping) shall be conducted in accordance with California Department of Fish and Wildlife (CDFW) protocol. If focused surveys are negative, no additional mitigation is required. If focused surveys are positive, an incidental take permit (ITP) shall be obtained from CDFW. Occupied habitat shall be mitigated at a minimum 1:1 ratio or as specified in the ITP. A biological monitor shall monitor construction activities to document compliance with conditions of the ITP.

MM-BIO-4 Burrowing Owl

Burrowing owl pre-construction surveys, consisting of two surveys, shall be conducted in accordance with California Department of Fish and Wildlife (CDFW) guidelines. One survey shall be no more than 30 days prior to initiation of construction activities (including site preparation, clearing, and grubbing, which are ground-disturbing project activities), and the second survey shall be conducted within 24 hours of the initiation of construction activities. If burrowing owls are not detected during the clearance survey, no additional mitigation is required.

If an active burrowing owl burrow is located within 500 feet from any project work area or disturbance area, a Burrowing Owl Relocation and Mitigation Plan shall be prepared and implemented following approval from the CDFW.

MM-BIO-5 Nesting Birds

To maintain compliance with the Migratory Bird Treaty Act and California Fish and Game Code, if ground-disturbing and/or vegetation clearance activities are scheduled to occur during the avian nesting season (typically February 15 through August 31), a pre-construction nesting bird survey shall be conducted by a qualified biologist within the project site and a 500-foot buffer around the project site. Surveys shall be conducted within 3 days prior to initiation of activity and shall be conducted between dawn and noon.

If an active nest is detected during the nesting bird survey, avoidance buffers shall be implemented as determined by a qualified biologist. The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird by accounting for topography, ambient conditions, species, nest location, and activity type. All nests shall be monitored as determined by the qualified biologist until nestlings have fledged and dispersed or it is confirmed that the nest has been unsuccessful or abandoned.

6 Conclusions

The proposed project has the potential to impact special-status biological resources as discussed in Sections 4.1.1 and 4.1.2 of this report; however, with implementation of the avoidance, minimization, and mitigation measures described in this report, the project would result in less-than-significant impacts to biological resources under CEQA.

Mr. Jorge Estrada

Subject: *Biological Resources Letter Report for the Desert Trails Preparatory Academy Project, City of Victorville,
San Bernardino County, California*

If you have any questions regarding this biological resources letter report, please feel free to contact me at 760.601.3416, or Veronika Archer at 951.300.2181.

Sincerely,



Britney Strittmater
Biologist

Att.: Attachment A – Figures
Attachment B – Site Photographs
Attachment C – Vascular Plant Species
Attachment D – Wildlife Species
Attachment E – Special-Status Plant Species Detected or Potentially Occurring in the Study Area
Attachment F – Special-Status Wildlife Species Detected or Potentially Occurring in the Study Area

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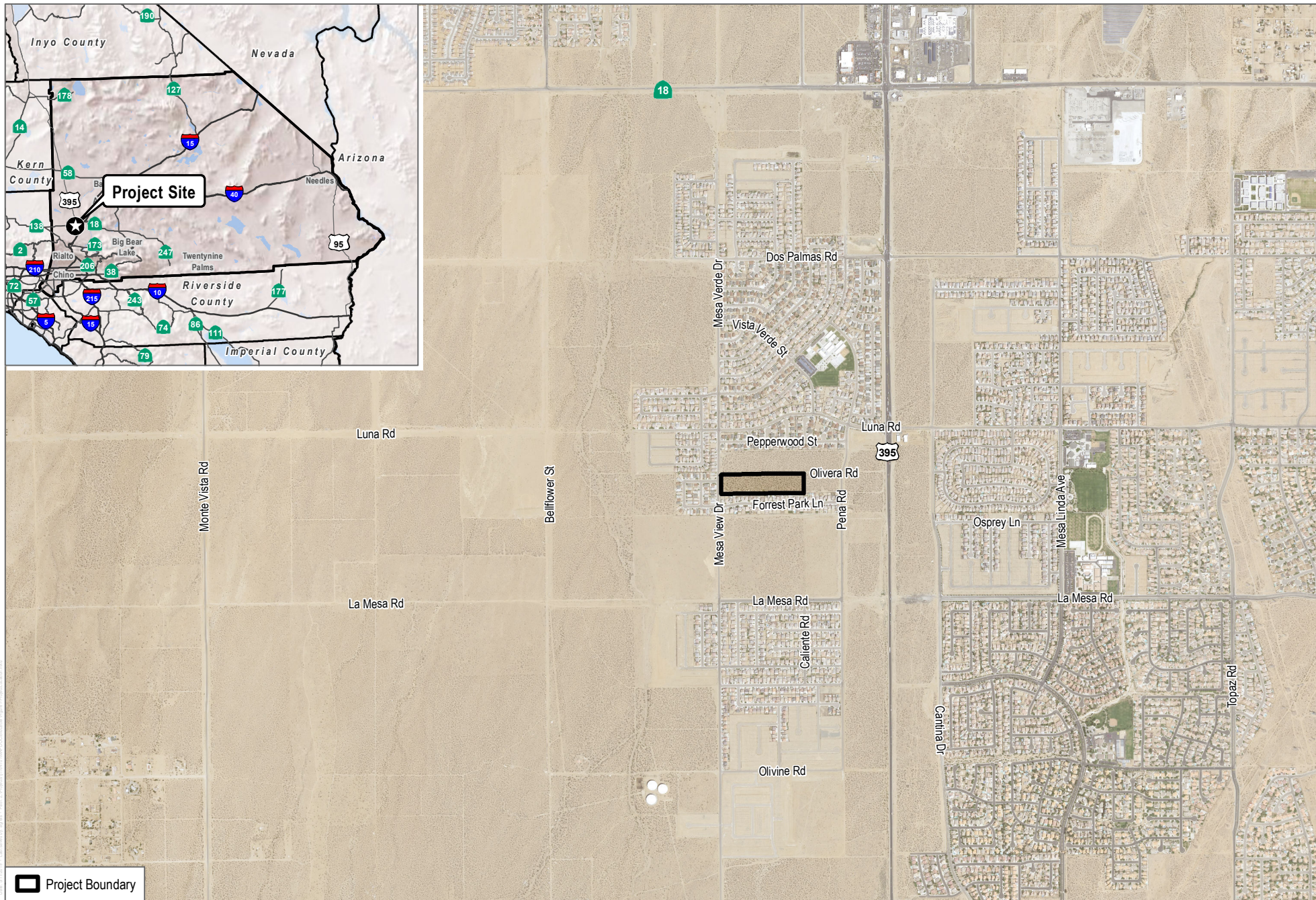
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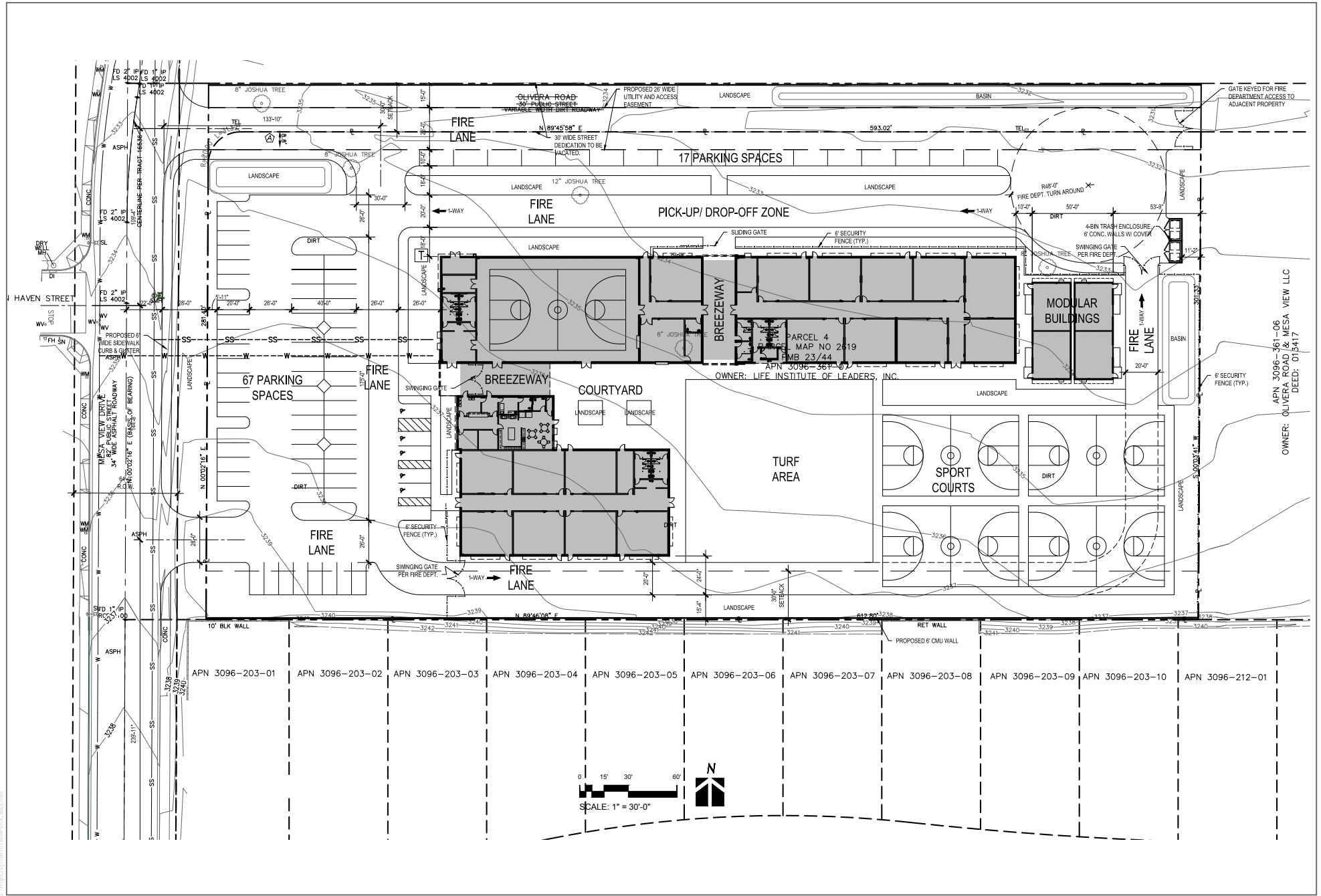


Attachment A

Figures



SOURCE: Riverside County 2019; USDA



SOURCE: MMA Architects, 2019

DUDEK

FIGURE 2
Site Plan

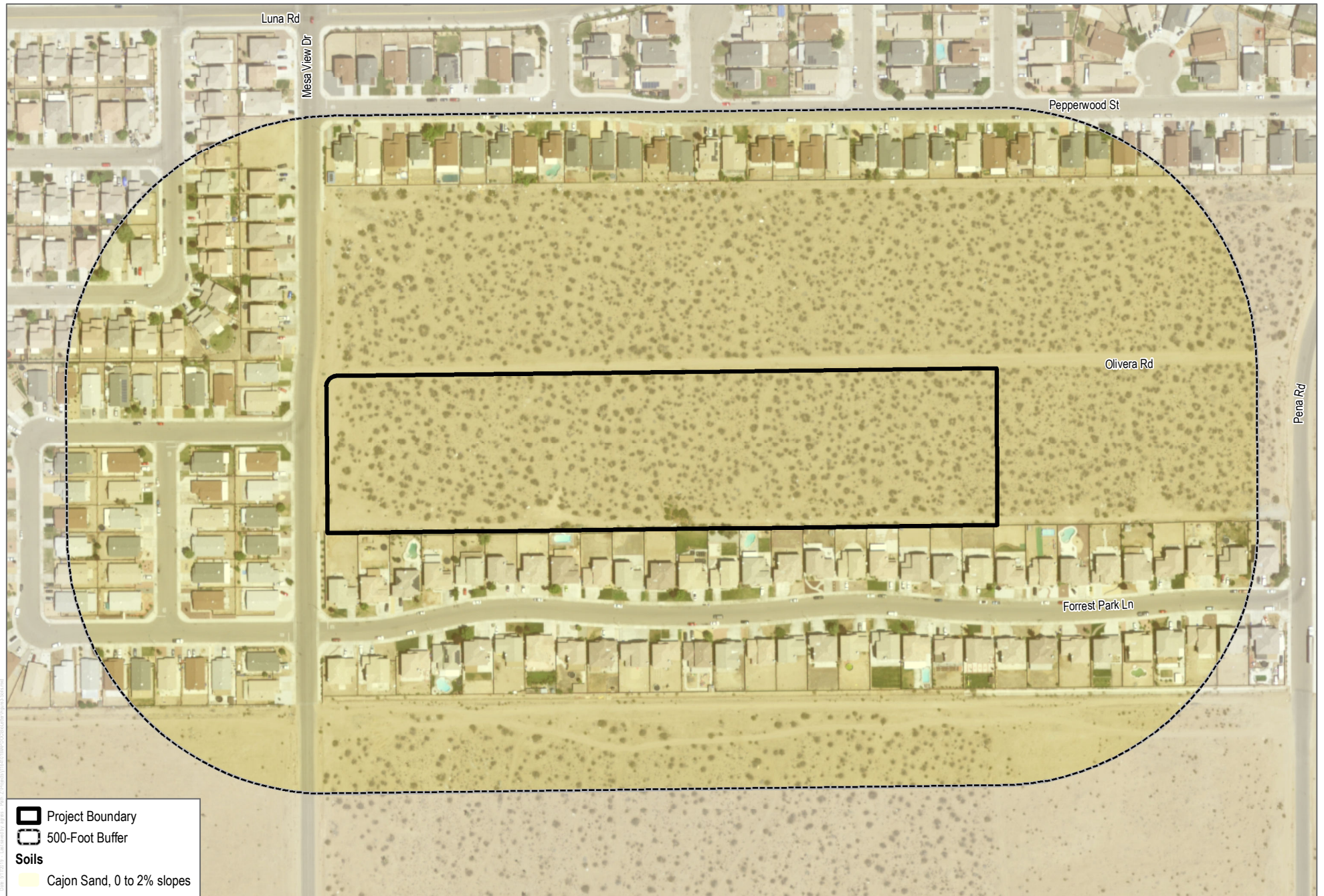
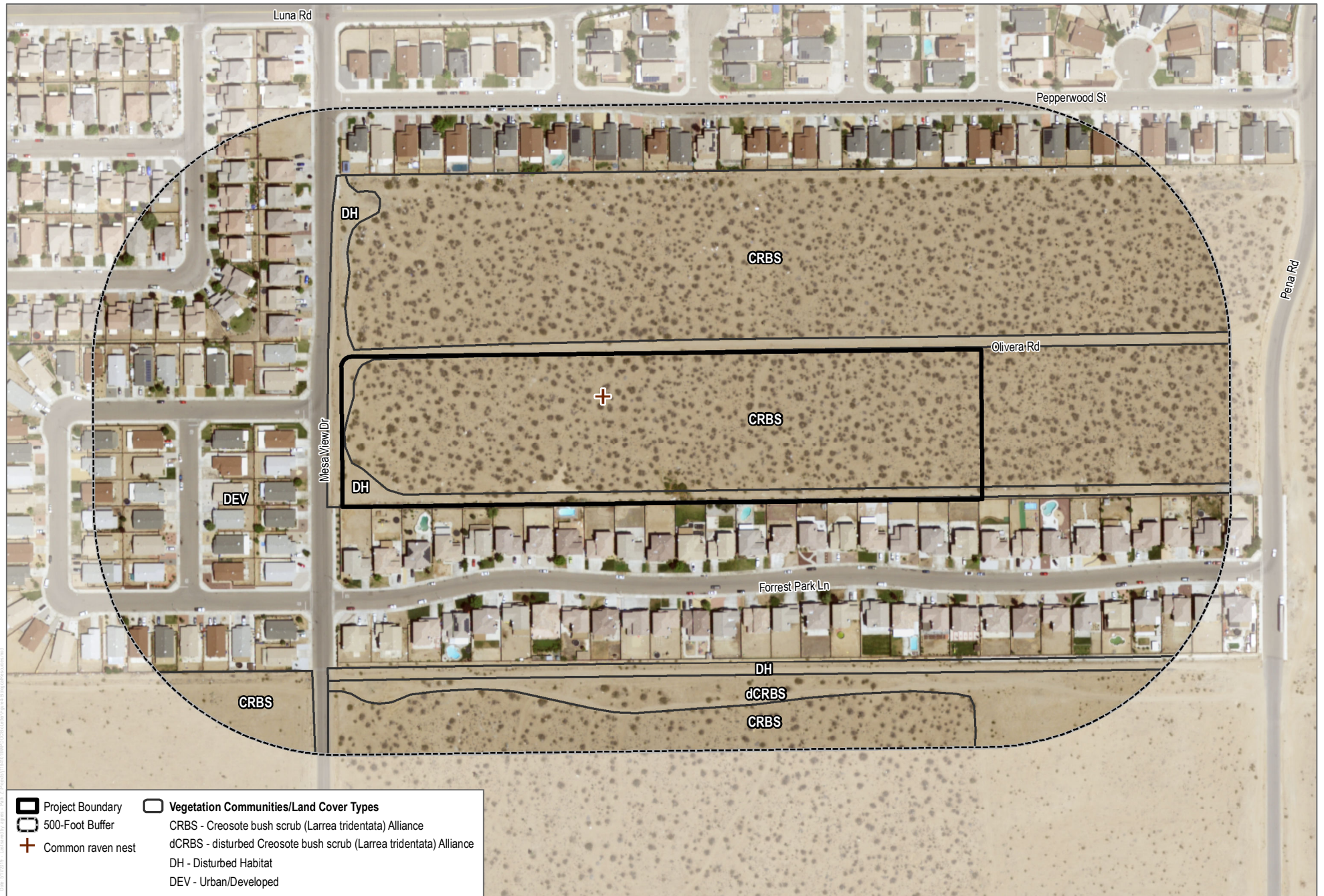


FIGURE 3
Soils



SOURCE: Riverside County 2019; USDA 2016

DUDEK



0 130 260 Feet

FIGURE 4

Biological Resources

Biological Resources Letter Report for the Desert Trails Preparatory Academy Project

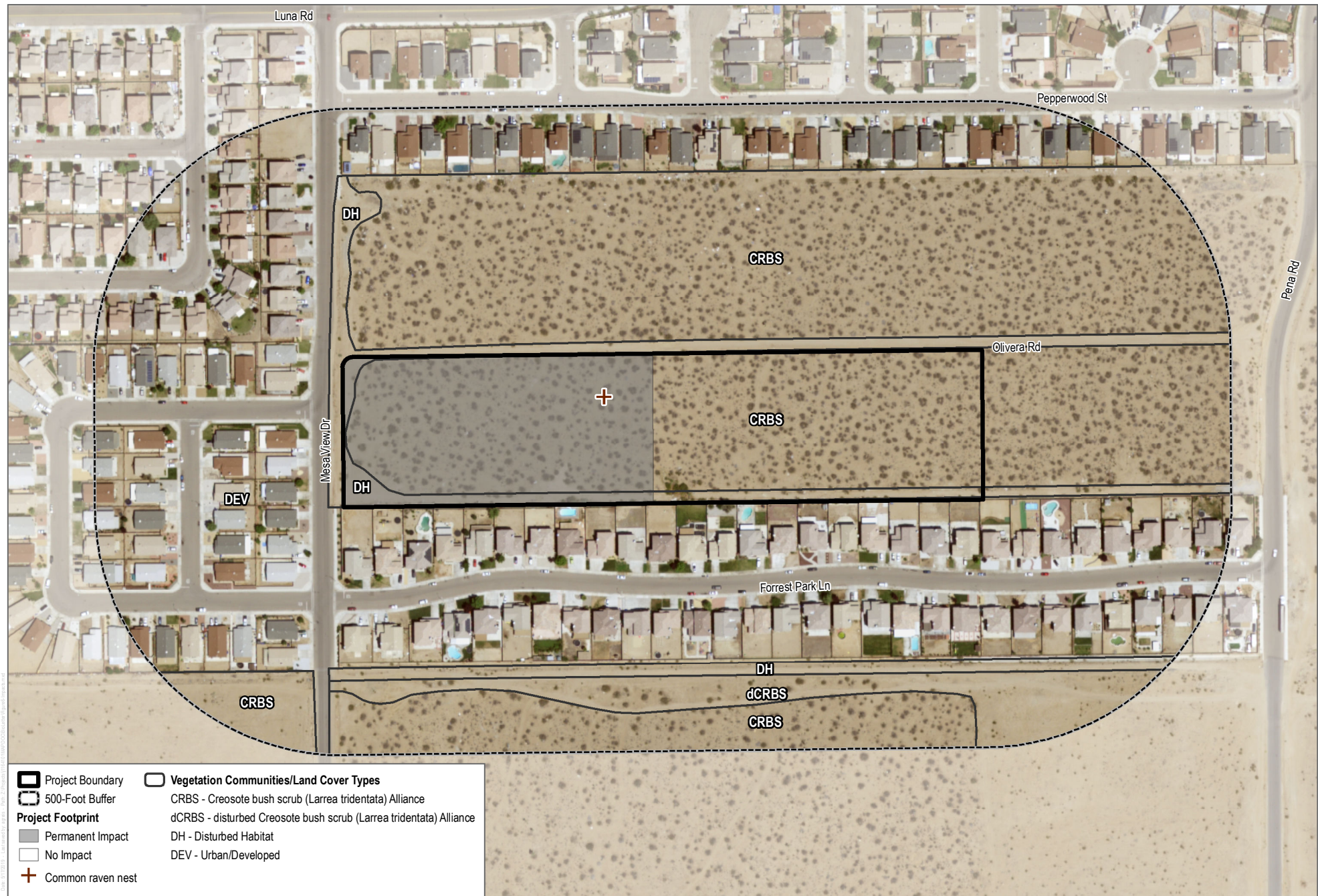


FIGURE 5

Impacts



Attachment B

Site Photographs



Photo 1: View of creosote bush scrub within western portion of project site. Facing east.



Photo 2: View of creosote bush scrub within central portion of project site. Facing south.



Photo 3: View of common raven nest located in Joshua tree within the central portion of the project site. Facing northeast.



Photo 4: View of ground squirrel burrow within project site.



Photo 5: View of disturbed habitat (i.e., Olivera Road) within central portion of study area. Facing east.



Photo 6: View of disturbed habitat (i.e., Olivera Road) and creosote bush scrub within the central portion of study area. Facing north.



Photo 7: View of creosote bush scrub within southwestern corner of the study area, west of Mesa View Drive. Facing west.



Photo 8: View of disturbed habitat and creosote bush scrub within southwestern corner of the study area, east of Mesa View Drive. Facing east.



Attachment C

Vascular Plant Species

EUDICOTS

VASCULAR SPECIES

ASTERACEAE—SUNFLOWER FAMILY

- Ambrosia acanthicarpa*—flatspine bur ragweed
- Ambrosia dumosa*—white bursage
- Ericameria nauseosa*—rubber rabbitbrush
- Lasthenia gracilis*—needle goldfields
- Malacothrix glabrata*—smooth desertdandelion

BORAGINACEAE—BORAGE FAMILY

- Amsinckia tessellata*—bristly fiddleneck
- Pectocarya peninsularis*—peninsular pectocarya

BRASSICACEAE—MUSTARD FAMILY

- Descurainia pinnata*—western tansymustard
- * *Sisymbrium altissimum*—tall tumbledmustard

GERANIACEAE—GERANIUM FAMILY

- * *Erodium cicutarium*—redstem stork's bill

LOASACEAE—LOASA FAMILY

- Mentzelia albicaulis*—whitestem blazingstar

MONTIACEAE—MONTIA FAMILY

- Calyptidium monandrum*—common pussypaws

POLEMONIACEAE—PHLOX FAMILY

- Linanthus parryae*—sandblossoms

POLYGONACEAE—BUCKWHEAT FAMILY

- * *Rumex crispus*—curly dock

ZYGOPHYLLACEAE—CALTROP FAMILY

- Larrea tridentata*—creosote bush

GYMNOSPERMS AND GNETOPHYTES

VASCULAR SPECIES

EPHEDRACEAE—EPHEDRA FAMILY

- Ephedra nevadensis*—Nevada joint fir

MONOCOTS
VASCULAR SPECIES

AGAVACEAE—AGAVE FAMILY

Yucca brevifolia—Joshua tree

POACEAE—GRASS FAMILY

- * *Bromus diandrus*—ripgut brome
- * *Bromus madritensis*—compact brome
- * *Bromus tectorum*—cheatgrass
- * *Hordeum murinum*—mouse barley
- * *Schismus barbatus*—common Mediterranean grass

* signifies introduced (non-native) species



Attachment D

Wildlife Species

BIRD

FINCHES

FRINGILLIDAE—FRINGILLINE & CARDUELINE FINCHES & ALLIES

Haemorhous mexicanus—house finch

HAWKS

ACCIPITRIDAE—HAWKS, KITES, EAGLES, & ALLIES

Buteo jamaicensis—red-tailed hawk

JAYS, MAGPIES & CROWS

CORVIDAE—CROWS & JAYS

Corvus brachyrhynchos—American crow

Corvus corax—common raven

MOCKINGBIRDS & THRASHERS

MIMIDAE—MOCKINGBIRDS & THRASHERS

Mimus polyglottos—northern mockingbird

OLD WORLD SPARROWS

PASSERIDAE—OLD WORLD SPARROWS

* *Passer domesticus*—house sparrow

PIGEONS & DOVES

COLUMBIDAE—PIGEONS & DOVES

Zenaida macroura—mourning dove

* *Columba livia*—rock pigeon (rock dove)

STARLINGS & ALLIES

STURNIDAE—STARLINGS

* *Sturnus vulgaris*—European starling*

INVERTEBRATE

BUTTERFLIES

NYMPHALIDAE—BRUSH-FOOTED BUTTERFLIES

Vanessa cardui—painted lady

MAMMAL

DOMESTIC

CANIDAE—WOLVES & FOXES

* Canis lupus familiaris—domestic dog

HARES & RABBITS

LEPORIDAE—HARES & RABBITS

Lepus californicus—black-tailed jackrabbit

SQUIRRELS

SCIURIDAE—SQUIRRELS

Spermophilus (Otospermophilus) beecheyi—California ground squirrel

REPTILE

LIZARDS

PHRYNOSOMATIDAE—IGUANID LIZARDS

Uta stansburiana—common side-blotched lizard



Attachment E

Special-Status Plant Species Detected or Potentially
Occurring in the Study Area

ATTACHMENT E

SPECIAL-STATUS PLANT SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Asclepias nyctaginifolia</i>	Mojave milkweed	None/None/2B.1	Mojavean desert scrub, Pinyon and juniper woodland/perennial herb/May–June/2,870–5,575	Moderate potential to occur. The site is located within the species' known elevation range and there is suitable desert scrub vegetation present. The nearest CNDDDB occurrence is approximately 10 miles south of the site (CDFW 2019).
<i>Astragalus lentiginosus</i> <i>var. antonius</i>	San Antonio milk-vetch	None/None/1B.3	Lower montane coniferous forest, Upper montane coniferous forest/perennial herb/Apr–July/4,920–8,530	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Astragalus leucolobus</i>	Big Bear Valley woollypod	None/None/1B.2	Lower montane coniferous forest, Pebble (Pavement) plain, Pinyon and juniper woodland, Upper montane coniferous forest; rocky/perennial herb/May–July/3,605–9,465	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Botrychium ascendens</i>	upswept moonwort	None/None/2B.3	Lower montane coniferous forest, Meadows and seeps; mesic/perennial rhizomatous herb/(June)July–Aug/3,655–9,990	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Botrychium crenulatum</i>	scalloped moonwort	None/None/2B.2	Bogs and fens, Lower montane coniferous forest, Meadows and seeps, Marshes and swamps (freshwater), Upper montane coniferous forest/perennial rhizomatous herb/June–Sep/4,160–10,760	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Calochortus palmeri</i> <i>var. palmeri</i>	Palmer's mariposa lily	None/None/1B.2	Chaparral, Lower montane coniferous forest, Meadows and seeps; mesic/perennial bulbiferous herb/Apr–July/2,325–7,840	Not expected to occur. No suitable vegetation present.
<i>Castilleja lasiorhyncha</i>	San Bernardino Mountains owl's-clover	None/None/1B.2	Chaparral, Meadows and seeps, Pebble (Pavement) plain, Riparian woodland, Upper montane coniferous forest; mesic/annual herb (hemiparasitic)/May–Aug/4,265–7,840	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.

ATTACHMENT E

SPECIAL-STATUS PLANT SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Chorizanthe xanti</i> var. <i>leucotheca</i>	white-bracted spineflower	None/None/1B.2	Coastal scrub (alluvial fans), Mojavean desert scrub, Pinyon and juniper woodland; sandy or gravelly/annual herb/Apr–June/980–3,935	Moderate potential to occur. The site is located within the species' known elevation range and there is suitable desert scrub vegetation and sandy/gravelly soils present. The nearest CNDDDB occurrence is approximately 10.4 miles south of the site (CDFW 2019).
<i>Deinandra mohavensis</i>	Mojave tarplant	None/SE/1B.3	Chaparral, Coastal scrub, Riparian scrub; mesic/annual herb/(May)June–Oct(Jan)/2,095–5,250	Not expected to occur. No suitable vegetation present.
<i>Diplacus mohavensis</i>	Mojave monkeyflower	None/None/1B.2	Joshua tree woodland, Mojavean desert scrub; sandy or gravelly, often in washes/annual herb/Apr–June/1,965–3,935	Low potential to occur. The site is located within the species' known elevation range and suitable desert scrub and sandy/gravelly soils are present; however, there are no washes present. The nearest CNDDDB occurrence is approximately 8.6 miles northeast of the site (CDFW 2019).
<i>Dodecahema leptoceras</i>	slender-horned spineflower	FE/SE/1B.1	Chaparral, Cismontane woodland, Coastal scrub (alluvial fan); sandy/annual herb/Apr–June/655–2,495	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Eremothera boothii</i> ssp. <i>boothii</i>	Booth's evening- primrose	None/None/2B.3	Joshua tree woodland, Pinyon and juniper woodland/annual herb/Apr–Sep/2,670–7,875	Not expected to occur. No suitable vegetation present.
<i>Helianthus nuttallii</i> ssp. <i>parishii</i>	Los Angeles sunflower	None/None/1A	Marshes and swamps (coastal salt and freshwater)/perennial rhizomatous herb/Aug–Oct/30–5,005	Not expected to occur. No suitable vegetation present.

ATTACHMENT E

SPECIAL-STATUS PLANT SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Heuchera parishii</i>	Parish's alumroot	None/None/1B.3	Alpine boulder and rock field, Lower montane coniferous forest, Subalpine coniferous forest, Upper montane coniferous forest; rocky, sometimes carbonate/perennial rhizomatous herb/June–Aug/4,920–12,465	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Lilium parryi</i>	lemon lily	None/None/1B.2	Lower montane coniferous forest, Meadows and seeps, Riparian forest, Upper montane coniferous forest; mesic/perennial bulbiferous herb/July–Aug/4,000–9,005	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Linanthus concinnus</i>	San Gabriel linanthus	None/None/1B.2	Chaparral, Lower montane coniferous forest, Upper montane coniferous forest; rocky, openings/annual herb/Apr–July/4,985–9,185	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Loeflingia squarrosa</i>	sagebrush loeflingia	None/None/2B.2	Desert dunes, Great Basin scrub, Sonoran desert scrub; sandy/annual herb/Apr–May/2,295–5,300	Moderate potential to occur. The site is located within the species' known elevation range and there is suitable desert scrub vegetation and sandy/gravelly soils present. The nearest CNDDDB occurrence is approximately 1 mile south of the site (CDFW 2019).
<i>Lycium parishii</i>	Parish's desert-thorn	None/None/2B.3	Coastal scrub, Sonoran desert scrub/perennial shrub/Mar–Apr/440–3,280	Low potential to occur. The site is located within the species' known elevation range and suitable desert scrub is present; however, this conspicuous perennial shrub would have likely been detected during the April 2019 site visit. The nearest CNDDDB occurrence is approximately 16.5 miles south of the site (CDFW 2019).

ATTACHMENT E

SPECIAL-STATUS PLANT SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Monardella australis</i> <i>ssp. jokerstii</i>	Jokerst's monardella	None/None/1B.1	Chaparral, Lower montane coniferous forest; Steep scree or talus slopes between breccia, secondary alluvial benches along drainages and washes./perennial rhizomatous herb/July–Sep/4,425–5,740	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Opuntia basilaris</i> var. <i>brachyclada</i>	short-joint beavertail	None/None/1B.2	Chaparral, Joshua tree woodland, Mojavean desert scrub, Pinyon and juniper woodland/perennial stem succulent/Apr– June(Aug)/1,390–5,905	Low potential to occur. The site is located within the species' known elevation range and suitable desert scrub is present; however, this conspicuous stem succulent would have likely been detected during the April 2019 site visit. The nearest CNDDDB occurrence is approximately 5.6 miles south of the site (CDFW 2019).
<i>Oreonana vestita</i>	woolly mountain- parsley	None/None/1B.3	Lower montane coniferous forest, Subalpine coniferous forest, Upper montane coniferous forest; gravel or talus/perennial herb/Mar– Sep/5,295–11,485	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Orobanche valida</i> ssp. <i>valida</i>	Rock Creek broomrape	None/None/1B.2	Chaparral, Pinyon and juniper woodland; granitic/perennial herb (parasitic)/May– Sep/4,100–6,560	Not expected to occur. The site is outside of the species' known elevation range and there is no suitable vegetation present.
<i>Pedimelum castoreum</i>	Beaver Dam breadroot	None/None/1B.2	Joshua tree woodland, Mojavean desert scrub; Sandy, washes and roadcuts/perennial herb/Apr–May/2,000–5,005	Low potential to occur. The site is located within the species' known elevation range and suitable desert scrub is present; however, the site lacks washes and road cuts. The nearest CNDDDB occurrence is approximately 5.7 miles northeast of the site (CDFW 2019).
<i>Schoenus nigricans</i>	black bog-rush	None/None/2B.2	Marshes and swamps (often alkaline)/perennial herb/Aug–Sep/490–6,560	Not expected to occur. No suitable vegetation present.

ATTACHMENT E

SPECIAL-STATUS PLANT SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Scientific Name	Common Name	Status (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Scutellaria bolanderi</i> <i>ssp. austromontana</i>	southern mountains skullcap	None/None/1B.2	Chaparral, Cismontane woodland, Lower montane coniferous forest; mesic/perennial rhizomatous herb/June–Aug/1,390–6,560	Not expected to occur. No suitable vegetation present.
<i>Symphyotrichum</i> <i>defoliatum</i>	San Bernardino aster	None/None/1B.2	Cismontane woodland, Coastal scrub, Lower montane coniferous forest, Meadows and seeps, Marshes and swamps, Valley and foothill grassland (vernally mesic); near ditches, streams, springs/perennial rhizomatous herb/July–Nov(Dec)/5–6,695	Not expected to occur. No suitable vegetation present.
<i>Symphyotrichum</i> <i>greatae</i>	Greata's aster	None/None/1B.3	Broadleafed upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest, Riparian woodland; mesic/perennial rhizomatous herb/June– Oct/980–6,595	Not expected to occur. No suitable vegetation present.
<i>Viola purpurea ssp.</i> <i>aurea</i>	golden violet	None/None/2B.2	Great Basin scrub, Pinyon and juniper woodland; sandy/perennial herb/Apr– June/3,280–8,200	Not expected to occur. No suitable vegetation present.

Status Legend:

FE: Federally listed as endangered

SE: State listed as endangered

CRPR: California Rare Plant Rank

CRPR 1A: Plants presumed extirpated in California and either rare or extinct elsewhere

CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere

CRPR 2A: Plants presumed extirpated in California but common elsewhere

CRPR 2B: Plants rare, threatened, or endangered in California but more common elsewhere

Threat Rank

0.1 – Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)

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

0.3 – Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat)

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Attachment F

Special-Status Wildlife Species Detected or Potentially
Occurring in the Study Area

ATTACHMENT F

SPECIAL-STATUS WILDLIFE SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Row Labels	Common Name	Status (Federal/State)	Habitat	Potential to Occur
Amphibians				
<i>Anaxyrus californicus</i>	arroyo toad	FE/SSC	Semi-arid areas near washes, sandy riverbanks, riparian areas, palm oasis, Joshua tree, mixed chaparral and sagebrush; stream channels for breeding (typically third order); adjacent stream terraces and uplands for foraging and wintering.	Not expected to occur. While there are a few scattered Joshua trees present, the study area does not contain any stream channels to support this species.
<i>Rana draytonii</i>	California red-legged frog	FT/SSC	Lowland streams, wetlands, riparian woodlands, livestock ponds; dense, shrubby or emergent vegetation associated with deep, still, or slow-moving water; uses adjacent uplands.	Not expected to occur. The study area does not contain any aquatic features or riparian vegetation to support this species.
<i>Rana muscosa</i>	mountain yellow-legged frog	FE/SE	Lakes, ponds, meadow streams, isolated pools, and open riverbanks; rocky canyons in narrow canyons and in chaparral.	Not expected to occur. The study area does not contain any aquatic features or rocky canyons to support this species.
Reptiles				
<i>Actinemys marmorata</i>	western pond turtle	None/SSC	Slow-moving permanent or intermittent streams, ponds, small lakes, and reservoirs with emergent basking sites; adjacent uplands used for nesting and during winter.	Not expected to occur. The study area does not contain any aquatic features to support this species.
<i>Aspidozelis tigris stejnegeri</i>	San Diegan tiger whiptail	None/SSC	Hot and dry areas with sparse foliage, including chaparral, woodland, and riparian areas.	Not expected to occur. The study area is outside of the known geographic range for this species.
<i>Gopherus agassizii</i>	Mojave desert tortoise	FT/ST	Arid and semi-arid habitats in Mojave and Sonoran Deserts, including sandy or gravelly locations along riverbanks, washes, sandy dunes, canyon bottoms, desert oases, rocky hillsides, creosote flats, and hillsides.	Moderate potential to occur. Suitable desert scrub (i.e., creosote flats) habitat is present within the study area. The nearest CNDDDB record is approximately 3 miles northeast of the project site (CDFW 2019).
<i>Phrynosoma blainvillii</i>	Blainville's horned lizard	None/SSC	Open areas of sandy soil in valleys, foothills, and semi-arid mountains including coastal scrub, chaparral, valley-foothill hardwood, conifer, riparian, pine-cypress, juniper, and annual grassland habitats.	Low potential to occur. The site does contain open sandy soils; however, does not contain suitable habitat to support this species.

ATTACHMENT F

SPECIAL-STATUS WILDLIFE SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Row Labels	Common Name	Status (Federal/State)	Habitat	Potential to Occur
<i>Thamnophis hammondi</i>	two-striped gartersnake	None/SSC	Streams, creeks, pools, streams with rocky beds, ponds, lakes, vernal pools.	Not expected to occur. The study area does not contain aquatic features to support this species.
Birds				
<i>Agelaius tricolor</i> (nesting colony)	tricolored blackbird	BCC/SSC, SCE	Nests near freshwater, emergent wetland with cattails or tules, but also in Himalayan blackberry; forages in grasslands, woodland, and agriculture.	Not expected to occur. The site does not contain suitable freshwater or emergent wetlands to support this species.
<i>Aquila chrysaetos</i> (nesting & wintering)	golden eagle	BCC/FP, WL	Nests and winters in hilly, open/semi-open areas, including shrublands, grasslands, pastures, riparian areas, mountainous canyon land, open desert rimrock terrain; nests in large trees and on cliffs in open areas and forages in open habitats.	Not expected to nest; low potential to forage. The study area does not contain cliffs or large trees to support the nesting or wintering of this species; however, there is open shrubland habitat that could provide foraging habitat.
<i>Asio otus</i> (nesting)	long-eared owl	None/SSC	Nests in riparian habitat, live oak thickets, other dense stands of trees, edges of coniferous forest; forages in nearby open habitats.	Not expected to occur. The study area does not contain riparian vegetation that could support this species.
<i>Athene cunicularia</i> (burrow sites and some wintering sites)	burrowing owl	BCC/SSC	Nests and forages in grassland, open scrub, and agriculture, particularly with ground squirrel burrows.	High potential to occur. Suitable open vegetation is present, and ground squirrel burrows are present. There are numerous CNDDDB records within the vicinity of the study area (CDFW 2019).
<i>Buteo swainsoni</i> (nesting)	Swainson's hawk	BCC/ST	Nests in open woodland and savanna, riparian, and in isolated large trees; forages in nearby grasslands and agricultural areas such as wheat and alfalfa fields and pasture.	Not expected to nest or forage. The study area does not contain cliffs or large trees to support the nesting or wintering of this species; nor does it contain agricultural or grassland areas suitable for foraging.
<i>Coccyzus americanus occidentalis</i> (nesting)	western yellow-billed cuckoo	FT, BCC/SE	Nests in dense, wide riparian woodlands and forest with well-developed understories.	Not expected to occur. The study area does not contain riparian vegetation that could support this species.
<i>Empidonax traillii eximius</i> (nesting)	southwestern willow flycatcher	FE/SE	Nests in dense riparian habitats along streams, reservoirs, or wetlands; uses variety of riparian and shrubland habitats during migration.	Not expected to occur. The study area does not contain riparian vegetation that could support this species.

ATTACHMENT F

SPECIAL-STATUS WILDLIFE SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Row Labels	Common Name	Status (Federal/State)	Habitat	Potential to Occur
<i>Haliaeetus leucocephalus</i> (nesting and wintering)	bald eagle	BCC/FP, SE	Nests in forested areas adjacent to large bodies of water, including seacoasts, rivers, swamps, large lakes; winters near large bodies of water in lowlands and mountains.	Not expected to occur. The study area does not contain large bodies of water that could support the nesting or wintering of this species.
<i>Icteria virens</i> (nesting)	yellow-breasted chat	None/SSC	Nests and forages in dense, relatively wide riparian woodlands and thickets of willows, vine tangles, and dense brush.	Not expected to occur. The study area does not contain riparian vegetation that could support this species.
<i>Lanius ludovicianus</i> (nesting)	loggerhead shrike	BCC/SSC	Nests and forages in open habitats with scattered shrubs, trees, or other perches.	Moderate potential to occur. The study area does contain suitable open nesting habitat with scattered shrubs and trees.
<i>Piranga rubra</i> (nesting)	summer tanager	None/SSC	Nests and forages in mature desert riparian habitats dominated by cottonwoods and willows.	Not expected to occur. The study area does not contain riparian vegetation that could support this species.
<i>Setophaga petechia</i> (nesting)	yellow warbler	BCC/SSC	Nests and forages in riparian and oak woodlands, montane chaparral, open ponderosa pine, and mixed-conifer habitats.	Not expected to occur. The study area does not contain riparian vegetation that could support this species.
<i>Toxostoma lecontei</i>	LeConte's thrasher	BCC/SSC	Nests and forages in desert wash, desert scrub, alkali desert scrub, desert succulent, and Joshua tree habitats; nests in spiny shrubs or cactus.	Moderate potential to occur within the study area. The study area contains individual Joshua trees and desert scrub habitat that could support the nesting and foraging of this species.
<i>Vireo bellii pusillus</i> (nesting)	least Bell's vireo	FE/SE	Nests and forages in low, dense riparian thickets along water or along dry parts of intermittent streams; forages in riparian and adjacent shrubland late in nesting season.	Not expected to occur. The study area does not contain riparian vegetation that could support this species.
<i>Vireo vicinior</i> (nesting)	gray vireo	BCC/SSC	Nests and forages in pinyon-juniper woodland, oak, and chamise and redshank chaparral.	Not expected to occur. The study area does not contain suitable nesting habitat for this species.
Fishes				
<i>Rhinichthys osculus</i> ssp. 3	Santa Ana speckled dace	None/SSC	Headwaters of the Santa Ana and San Gabriel Rivers; may be extirpated from the Los Angeles River system.	Not expected to occur. The study area does not contain mesic or aquatic habitat that could support this species.

ATTACHMENT F

SPECIAL-STATUS WILDLIFE SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Row Labels	Common Name	Status (Federal/State)	Habitat	Potential to Occur
<i>Siphateles bicolor mohavensis</i>	Mohave tui chub	FE/SE, FP	Lacustrine ponds or pools; 4 feet minimum water depth; freshwater flow; mineralized and alkaline environment; habitat for aquatic invertebrate prey and egg attachment substrate; <i>Ruppia maritima</i> preferred for egg attachment and thermal refuge in summer months.	Not expected to occur. The study area does not contain mesic or aquatic habitat that could support this species.
Mammals				
<i>Antrozous pallidus</i>	pallid bat	None/SSC	Grasslands, shrublands, woodlands, forests; most common in open, dry habitats with rocky outcrops for roosting, but also roosts in man-made structures and trees.	Low potential to roost and forage within the project site. The surrounding study area contains shrublands and open habitat that could support the foraging of this species and Joshua trees that could support roosting.
<i>Chaetodipus fallax pallidus</i>	pallid San Diego pocket mouse	None/SSC	Desert wash, desert scrub, desert succulent scrub, and pinyon-juniper woodland.	Moderate potential to occur. The study area contains suitable desert scrub to support this species.
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	None/SSC	Mesic habitats characterized by coniferous and deciduous forests and riparian habitat, but also xeric areas; roosts in limestone caves and lava tubes, man-made structures, and tunnels.	Not expected to occur. The study area does not contain forest or riparian habitat that could support the roosting or foraging of this species.
<i>Eumops perotis californicus</i>	western mastiff bat	None/SSC	Chaparral, coastal and desert scrub, coniferous and deciduous forest and woodland; roosts in crevices in rocky canyons and cliffs where the canyon or cliff is vertical or nearly vertical, trees, and tunnels	Not expected to roost due to lack of suitable canyons and cliffs; low potential to forage. The study area does not contain desert scrub habitat that could support the foraging of this species.
<i>Glaucomys oregonensis californicus</i>	San Bernardino flying squirrel	None/SSC	Coniferous and deciduous forests, including riparian forests	Not expected to occur. No suitable vegetation present.
<i>Microtus californicus mohavensis</i>	Mojave river vole	None/SSC	Wet, weedy, herbaceous areas along the Mojave River.	Not expected to occur. The study area is not adjacent to the Mojave River.
<i>Ovis canadensis nelsoni</i>	Nelson's bighorn sheep	None/FP	Steep slopes and cliffs, rough and rocky topography, sparse vegetation; also canyons, washes, and alluvial fans.	Not expected to occur. The study area does not contain steep slopes or wash habitat that could support this species.

ATTACHMENT F

SPECIAL-STATUS WILDLIFE SPECIES DETECTED OR POTENTIALLY OCCURRING IN THE STUDY AREA

Row Labels	Common Name	Status (Federal/State)	Habitat	Potential to Occur
<i>Spermophilus</i> (<i>Xerospermophilus</i>) <i>mohavensis</i>	Mohave ground squirrel	None/ST	Desert scrub habitats including those dominated by creosote bush and burrobush, desert sink scrub, and desert saltbush scrub.	Moderate potential to occur within the study area. Suitable desert scrub habitat dominated by creosote bush scrub is present, and the nearest CNDDB occurrence is approximately 2.6 miles south of the study area (CDFW 2019).
<i>Taxidea taxus</i>	American badger	None/SSC	Dry, open, treeless areas; grasslands, coastal scrub, agriculture, and pastures, especially with friable soils.	Low potential to occur. The study area contains open, scrub habitat that could support this species.

Status Abbreviations

FE: Federally listed as endangered

FT: Federally listed as threatened

BCC: USFWS—Birds of Conservation Concern

SSC: California Species of Special Concern

FP: CDFW Fully Protected Species

SE: State listed as endangered

ST: State listed as threatened

SCE: State candidate for listing as endangered

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