



January 8, 2020

WEST GROVE 9.5, LLC
C/O NICOLE ARMSTRONG
P.O. Box 9716
Redlands, California 92375

SUBJECT: Habitat Assessment for The Standard (formerly called Westgrove) Apartment Project Located in the City of Redlands, San Bernardino County, California

Introduction

This report contains the findings of ELMT Consulting's (ELMT) habitat assessment for The Standard (formally called Westgrove) Apartments (project site or site) located in the City of Redlands, San Bernardino County, California. The habitat assessment was conducted by biologist Travis J. McGill on December 18, 2018 to document baseline conditions and assess the potential for special-status¹ plant and wildlife species to occur within the project site that could pose a constraint to implementation of the proposed project.

Project Location

The project site is generally located north of Interstate 10, east of Interstate 215, west of State Route 210, and south of State Route 66 in the City of Redlands, San Bernardino County, California. The project site is depicted on the Redlands quadrangle of the United States Geological Survey's (USGS) 7.5-minute topographic map series within Section 20, Township 1 south, Range 3 west. Specifically, the project site is located within Assessor Parcel Number (APN) 0292-053-08 approximately 660 feet west of Nevada Street, 1,300 feet east of California Street, and is bordered by Lugonia Avenue on its southern boundary. Refer to Exhibits 1 thru 4 in Attachment A.

Project Description

The Standard (project) will consist of 282 apartments (280 leasable units, 1 permanent managers unit and 1 model unit for preleasing activities) in five (5) three story buildings, two (2) two story buildings and a 'clubhouse' with multi-purpose facilities. The project incorporates design elements proven to have high market appeal and complements the diverse architecture and design of existing apartment communities nearby.

The maximum building height will not exceed 38 feet tall. Within the residential buildings there are three building types. Buildings 1 thru 4 are type 'A' and defined as three stories in height and hosts a total of 87,986 gross square feet. Building 5 is type 'B' which contains three stories and a total of 37,236 gross

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

square feet. Buildings 6 & 7 are type 'C' which is two stories in height and contains a total of 4,792 square feet. The clubhouse/pool house building will be used by the residents of the project and will be 7584 SF and 1000 SF respectfully totaling 8584 square feet in size. The total footprint area of the buildings is 138,554 SF, which covers 33% of the total "coverage area" within the site.

A parking/landscape buffer has been provided between the project and the proposed industrial use to the north and west by proposing a series of carports, garages and landscape screening with the closet residential structure over 60 feet from any common property line. Contiguous pedestrian-scale connections from any point of the project to the enhanced amenity zones will be available for the convenience and pleasure of the residents. Approximately 4500 square feet of courtyard/landscaped open space will separate apartment clusters, creating a much more engaging residential atmosphere than the typical apartment complex.

The proposed project will provide 195 parking spaces within garages (20 spaces incorporating lifters), 142 carports, 93 open tenant spaces and 38 open visitor spaces. The total parking provided is 474. The ratio is 1.70 spaces per unit. Of the 474 parking spaces provided within the development, 24 spaces will be designated handicap parking spaces. Landscaping and open area will encompass 98,845.60 sq. ft. (23%) of the "coverage area" within the site. In addition, 5% of the site shall be treated with decorative pavers for further enhancement and softening of the hardscape.

Project will include one new primary public access/drive approach per County Standards along Lugonia Ave located at the east property line. that will be gated. Additionally, the project will provide a secondary exit only drive with a Knox box along Lugonia Ave. located at the west property line for tenant use and emergency services access. Both drives will be constructed per San Bernardino County Fire Department Standards that will access 30-foot wide drive aisles throughout the project.

Methodology

A literature review and records search were conducted to determine which special-status biological resources have the potential to occur on or within the general vicinity of the project site. In addition to the literature review, a general habitat assessment or field investigation of the project site was conducted to document existing conditions and assess the potential for special-status biological resources to occur within the project site.

Literature Review

Prior to conducting the habitat assessment, a literature review and records search was conducted for special-status biological resources potentially occurring on or within the vicinity of the project site. Previously recorded occurrences of special-status plant and wildlife species and their proximity to the project site were determined through a query of the California Department of Fish and Wildlife's (CDFW's) QuickView Tool in the Biogeographic Information and Observation System (BIOS), California Natural Diversity Database (CNDDDB) Rarefind 5, the California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants of California, Calflora Database, compendia of special-status species published by CDFW, and the United States Fish and Wildlife Service (USFWS) species listings.

All available reports, survey results, and literature detailing the biological resources previously observed

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

- Google Earth Pro historic aerial imagery (1994-2018);
- United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Soil Survey;
- USFWS Critical Habitat designations for Threatened and Endangered Species; and
- USFWS Endangered Species Profiles.

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

Habitat Assessment/Field Investigation

Following the literature review, biologist Travis J. McGill inventoried and evaluated the condition of the habitat within the project site on December 18, 2018. Plant communities and land cover types identified on aerial photographs during the literature review were verified by walking meandering transects throughout the project site. In addition, aerial photography was reviewed prior to the site investigation to locate potential natural corridors and linkages that may support the movement of wildlife through the area. These areas identified on aerial photography were then walked during the field investigation.

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

Soil Series Assessment

On-site and adjoining soils were researched prior to the field investigation using the USDA NRCS Soil Survey² for San Bernardino County, California. In addition, a review of the local geological conditions and historical aerial photographs was conducted to assess the ecological changes that the project site has undergone.

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

Plant Communities

Plant communities were mapped using 7.5-minute USGS topographic base maps and aerial photography. The plant communities were classified in accordance with Sawyer, Keeler-Wolf and Evens (2009), CDFW (2010) and Holland (1986), delineated on an aerial photograph, and then digitized into GIS Arcview. The Arcview application was used to compute the area of each plant community and/or land cover type in acres.

Plants

Common plant species observed during the field investigation were identified by visual characteristics and morphology in the field and recorded in a field notebook. Unusual and less familiar plants were photographed in the field and identified in the laboratory using taxonomic guides. Taxonomic nomenclature used in this study follows the 2012 Jepson Manual (Hickman 2012). In this report, scientific names are provided immediately following common names of plant species (first reference only).

Wildlife

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

Jurisdictional Drainages and Wetlands

Aerial photography was reviewed prior to conducting a field investigation in order to locate and inspect any potential natural drainage features, ponded areas, or water bodies that may fall under the jurisdiction of the United States Army Corps of Engineers (Corps), Regional Water Quality Control Board (Regional Board), or CDFW. In general, surface drainage features indicated as blue-line streams on USGS maps that are observed or expected to exhibit evidence of flow are considered potential riparian/riverine habitat and are also subject to state and federal regulatory jurisdiction.

Existing Site Condition

The proposed project site is relatively flat with no areas of significant topographic relief at an elevation of approximately 1,180 feet above mean sea level. On-site and adjoining soils were researched prior to the field visit using the USDA NRCS, Soil Survey. According to the Soil Survey, soils that have been mapped within the proposed project site consist of Hanford sandy loam, 0 to 2 percent slopes (refer to Exhibit 5, *Soils* in Attachment A). The Hanford soil series consists of very deep well drained soils that formed in moderately coarse textured alluvium dominantly from granite. These soils are on stream bottoms, floodplains and alluvial fans and have slopes of 0 to 15 percent. Soils on-site have been and heavily compacted mechanically disturbed from existing agricultural and weed abatement activities, and surrounding development.

The project site occurs in an area that has undergone a conversion from natural habitats into agricultural,

residential, industrial, and commercial land uses. The project site is bordered by an approved 360-unit apartment development to the east (expected to begin construction in 2020/21), a developed fulfillment center to the west, a 500,000 square foot industrial building to the north, and Lugonia Avenue to the south. South of Lugonia Avenue is a mix of commercial/office/employment related land uses.

Vegetation

Due to existing land uses, no native plant communities or natural communities of special concern were observed on or adjacent to the project site. The project site primarily consists of vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances. The project site has been subject to historic agricultural activities, on-going weed abatement activities, and disturbance associated with surrounding development. These disturbances have eliminated and/or greatly disturbed the natural plant communities that historically occurred within the immediate vicinity of the project site. Refer to Attachment B, *Site Photographs*, for representative site photographs. No native plant communities will be impacted from implementation of the proposed project.

The project site contains a land cover type that would be classified as disturbed. Refer to Exhibit 6, *Vegetation* in Attachment A. Disturbed areas are generally areas that have been subject to a high level of human disturbances and no longer comprise a native plant community. These areas are unpaved and are primarily or entirely devoid of vegetation, or support ruderal/weedy plant species. Early successional and non-native weedy plant species compose a majority of the project site as a result of the on-going weed abatement activities. Plant species observed on-site include Russian thistle (*Salsola tragus*), telegraph weed (*Heterotheca grandiflora*), short-podded mustard (*Hirschfeldia incana*), cheeseweed (*Malva parviflora*), bromus species (*Bromus ssp*), pigweed (*Amaranthus albus*), wild oat (*Avena fatua*), and ripgut brome (*Bromus diandrus*).

Wildlife

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

Fish

No fish or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for fish were observed on or within the vicinity of the project site. Therefore, no fish are expected to occur and are presumed absent from the project site.

Amphibians

No amphibians or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable habitat for amphibian species were observed on or within the vicinity of the project site. Therefore, no amphibians are expected to occur on the project site and are presumed absent.

Reptiles

During the field investigation Great Basin fence lizard (*Sceloporus occidentalis longipes*) was the only reptilian species observed on-site. Common reptilian species adapted to a high degree of anthropogenic disturbances that have the potential to occur on-site include western side-blotched lizard (*Uta stansburiana elegans*), alligator lizard (*Elgaria multicarinata*), and gopher snake (*Pituophis catenifer annectens*). Due to the high level of anthropogenic disturbances on-site, and surrounding development, no special-status reptilian species are expected to occur within project-site.

Birds

The project site provides minimal foraging habitat for bird species adapted to a high degree of human disturbance. Bird species detected during the field investigation included American kestrel (*Falco sparverius*), lesser goldfinch (*Spinus psaltria*), northern mockingbird (*Mimus polyglottos*), mourning dove (*Zenaidura macroura*), house finch (*Haemorhous mexicanus*), American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), and Say's phoebe (*Sayornis saya*).

Mammals

During the field investigation no mammalian species were observed on-site. Common mammalian species adapted to a high degree of anthropogenic disturbances that have the potential to occur within the project site include cottontail (*Sylvilagus audubonii*), Botta's pocket gopher (*Thomomys bottae*), opossum (*Didelphis virginiana*), and raccoon (*Procyon lotor*).

Nesting Birds

No active nests or birds displaying nesting behavior were observed during the December 18, 2018 field investigation, which was conducted outside of the avian nesting season. The project site provides limited nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area, due to the routine anthropogenic disturbances found onsite.

Migratory Corridors and Linkages

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

The proposed project will be confined to existing disturbed areas and is surrounded by development, which has removed natural plant communities from the surrounding area. The project site is isolated from regional wildlife corridors and linkages, and there are no riparian corridors, creeks, or useful patches of stepping stone habitat (natural areas) within or connecting the project site to any identified wildlife corridors or

linkages. The closest regional wildlife corridor is located approximately 1.5 miles north of the project site along the Santa Ana River, which is separated from the project site by existing industrial developments. As a result, implementation of the proposed project will not disrupt or have any adverse effects on any migratory corridors or linkages in the surrounding area.

Jurisdictional Areas

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

No jurisdictional drainage and/or wetland features were observed on the project site during the habitat assessment that would be considered jurisdictional by the Corps, Regional Board, or CDFW. Therefore, regulatory approvals from the Corps, Regional Board, and/or CDFW will not be required for implementation of the project.

Special-Status Biological Resources

The CNDDDB and CNPS was queried for reported locations of special-status plant and wildlife species as well as special-status natural plant communities in the Redlands USGS 7.5-minute quadrangle. The record search focused on the Redlands USGS 7.5-minute quadrangle since the proposed project footprint will be confined to existing disturbed areas, and is isolated from undisturbed native habitats. A search of published records of these species was conducted within this quadrangle using the CNDDDB Rarefind 5 online software and CNDDDB Quickview Tool in BIOS, and CNPS Inventory of Rare, Threatened, and Endangered Plants of California. The habitat assessment evaluated the conditions of the habitat(s) within the boundaries of the project site to determine if the existing plant communities have the potential to provide suitable habitat(s) for special-status plant and wildlife species previously documented in the general vicinity of the proposed project site.

The literature search identified eighteen (18) special-status plant species and forty-eight (48) special-status, and three (3) special-status plant communities as having potential to occur within the Redlands USGS 7.5-minute quadrangle. Special-status plant and wildlife species were evaluated for their potential to occur within the project site based on habitat requirements, availability and quality of suitable habitat, and known distributions. Species determined to have the potential to occur within the general vicinity of the project site are presented in *Table C-1: Potentially Occurring Special-Status Biological Resources*, provided in Attachment C.

Special-Status Plants

According to the CNDDDB and CNPS, eighteen (18) special-status plant species have been recorded in the Redlands quadrangle (refer to Attachment C). No special-status plant species were observed on-site during the habitat assessment. The project site primarily consists of vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances including on-going weed abatement activities. These

disturbances have eliminated the natural plant communities that once occurred on-site which has removed suitable habitat for special-status plant species known to occur in the general vicinity of the project site. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, it was determined that the project site does not provide suitable habitat for any of the special-status plant species known to occur in the area and are presumed to be absent from the project site. No focused surveys are recommended.

Special-Status Wildlife

According to the CNDDDB, forty-eight (48) special-status wildlife species have been reported in the Redlands quadrangle (refer to Attachment C). No special-status wildlife species were observed on-site during the habitat assessment. The project site primarily consists of vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances including on-going weed abatement activities and historic agricultural uses. These disturbances have eliminated the natural plant communities that once occurred on-site which has greatly reduced the potential for special-status species to occur on-site. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the project site has a low potential to support low quality foraging habitat for Cooper's hawk (*Accipiter cooperii*) and California horned lark (*Eremophila alpestris actia*). All remaining special-status wildlife species known to occur in the area were presumed to be absent from the project site.

In order to ensure impacts to Cooper's hawk and California horned lark do not occur from implementation of the proposed project, a pre-construction clearance nesting bird survey shall be conducted prior to ground disturbance. With implementation of the pre-construction nesting bird clearance survey, impacts to the Cooper's hawk and California horned lark will be less than significant and no mitigation will be required.

Special-Status Plant Communities

According to the CNDDDB, three (3) special-status plant communities have been reported in the Redlands USGS 7.5-minute quadrangle: Riversidean Alluvial Fan Sage Scrub, Southern Coast Live Oak Riparian Forest, and Southern Sycamore Alder Riparian Woodland. Based on the results of the field investigation, no special-status plant communities were observed on-site.

Critical Habitat

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

federal agency that is responsible for providing the funding or permit would consult with the USFWS. The project site is not located with federally designated Critical Habitat. Refer to Exhibit 7, *Critical Habitat* in Attachment A. The nearest designated Critical Habitat is located approximately 1.5 miles north of the project site for San Bernardino kangaroo rat (*Dipodomys merriami parvus*) and Santa Ana sucker (*Catostomus santaanae*). Implementation of the proposed project will not impact Critical Habitat. Therefore, the loss or adverse modification of Critical Habitat from site development will not occur and consultation with the USFWS for impacts to Critical Habitat will not be required for implementation of the proposed project.

Recommendations

Migratory Bird Treaty Act and Fish and Game Code

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey shall be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season.

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer (generally 300 feet for migratory and non-migratory song birds and 500 feet raptors and special-status species) will be determined by the wildlife biologist, in coordination with the CDFW, and will depend on the level of noise and/or surrounding disturbances, line of sight between the nest and the construction activity, ambient noise, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Conclusion

The entire project site consists of vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances (i.e. agricultural activities, weed abatement activities, and surrounding development). On-site and surrounding land uses have eliminated naturally occurring habitats around the project footprint, reducing the ability of the project site to support special-status plant and wildlife species. As a result, and based on the results of the habitat assessment, it was determined that the project site has a low potential to provide suitable foraging habitat for Cooper's hawk and California horned lark. All remaining special-status plant and wildlife species are presumed absent from the project site.

Based on the proposed project footprint and existing site conditions discussed in this report, none of the special-status plant or wildlife species known to occur in the general vicinity of the project site are expected to be directly or indirectly impacted from implementation of the proposed project. With completion of the recommendations provided above, no impacts to year-round and seasonal avian residents will occur from implementation of the proposed project. Therefore, it was determined that implementation of the project will have “no effect” on federally or State listed species known to occur in the general vicinity of the project site. Additionally, the project will not impact designated Critical Habitats or regional wildlife movement corridors/linkages.

Please do not hesitate to contact Tom McGill at (951) 285-6014 or tmcgill@elmtconsulting.com or Travis McGill at (909) 816-1646 or travismcgill@elmtconsulting.com should you have any questions regarding this proposal.

Sincerely,



Thomas J. McGill, Ph.D.
Managing Director



Travis J. McGill
Director

Attachments:

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