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MEMORANDUM

TO:	Shean Kim	**FROM:**	Michael Nieto
CC:	Sophia Kim	Heather Bleemers	
DATE:	October 3rd, 2022		
SUBJECT:	Narrative Summary of edits to Roxford Warehouse Protected Tree Report (September 2022) and Biological Resources Technical Report (September 2022) for the 15825 Roxford Street Warehouse Project (WRA 30236).		

Dear Mr. Kim,

The purpose of the following memorandum is to summarize changes and edits made to the Protected Tree Report and Biological Technical Report as a result of the incorporation of an updated site plan for the 15825 Roxford street Project (project) located in the Sylmar community Plan Area of the City of Los Angeles, California.

The updated site plan for the project includes an update to the grading plan and landscape plan associated with the project (Tree Report and Biological Technical Report Figures 3a, and 3b). The site plan changes included the replacement on a planned parking lot in the south-eastern corner of the project known as "the panhandle" with a stormwater detention basin and bio-planter to treat stormwater flows onsite before they leave the project area.

As the stormwater basin and bio-planter areas of the panhandle will require substantial grading to create, impacts to protected trees (#339 and #335) in the area will not be avoidable (Tree Report: Appendix B, page 13 of 13). As these trees were also planned on being removed as a part of the previous site plan to place a parking lot in the panhandle, there is no change to total protected tree impacts (five coast live oak [*Quercus agrifolia*]) or required mitigation (4:1 ratio, total of 20 planted coast live oak trees) as a part of the landscape plan.

The updated landscape plan has reduced the amount 24" box planters of coast live oaks to be planted as a part of the plan from 55 to 51 trees. While the updated landscape plan includes a reduction of four individual plants to be included as a part of the landscaping, the revised total (51) still substantially exceeds the required mitigation (20) for protected trees using container plants of this size (24" box planters).

Changes the Project Tree Report and Biological Technical Report include figures and descriptions of the site updated site plan including:

Tree Report:

- Updated Figure 3 – Grading Plan
- Updated Figure 4 – Landscape Plan
- Updated to Appendix B (pages 1-13)

Biological Technical Report:

- Section 3.4 -Tree Impact Assessment and Protected Tree Removal Findings. Reference to landscape plan changed from “55” to “51” 24 inch box planters of coast live oak trees to be planted.
- Section 7.5 Local Policies and Ordinances. Proposed replacement trees changed from “55” to “51”
- Updated Figure 3a -Site Plan (Xebec 2022)
- Updated Figure 3b – Landscape Plan (SPLA 2022)

Please feel free to contact me if you have any questions or comments.

Michael Nieto

Southern California Natural Resource Director, WRA Inc.

BIOLOGICAL RESOURCES TECHNICAL REPORT

15825 ROXFORD STREET PROJECT

CITY OF LOS ANGELES, LOS ANGELES COUNTY, CALIFORNIA

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WRA #30236
SEPTEMBER 2022

ENVIRONMENTAL CONSULTANTS

TABLE OF CONTENTS

1.0 INTRODUCTION 1

1.1 Overview and Purpose 1
1.2 Project Description 1
1.3 Summary of Results 1

2.0 REGULATORY BACKGROUND 5

2.1 Federal and State Regulatory Setting 5

2.1.1 Vegetation and Aquatic Communities 5
2.1.2 Special-status Species 6

2.2 Local Plans and Policies 8

3.0 ASSESSMENT METHODOLOGY 9

3.1 Vegetation Communities and Other Land Cover Types 10
3.2 Special-status Species 10
3.3 Wildlife Corridors and Native Wildlife Nursery Sites 11
3.4 Protected Trees 11

3.4.1 Tree Inventory 11
3.4.2 Tree Assessment 12
3.4.3 Tree Impact Assessment and Mitigation Requirements 12

4.0 ECOLOGICAL SETTING 13

4.1 Soils and Topography 13
4.2 Climate and Hydrology 14
4.3 Land-use 14

5.0 ASSESSMENT RESULTS 14

5.1 Vegetation Communities and Other Land Cover 14

5.1.1 Terrestrial Land Cover 15
5.1.2 Aquatic Resources 15

5.2 Special-status Species 15

5.2.1 Special-status Plants 15
5.2.2 Special-status Wildlife 16

5.3 Wildlife Corridors and Native Wildlife Nursery Sites 16
5.4 Protected Trees 17

5.4.1 Tree Inventory 17
5.4.2 Tree Assessment 17

6.0 ANALYTICAL METHODOLOGY AND SIGNIFICANCE THRESHOLD CRITERIA 18
7.0 IMPACTS AND MITIGATION EVALUATION 18

7.1 Special-status Species 18
7.2 Sensitive Natural Communities and Land Cover Types 19
7.3 Aquatic Resources 20
7.4 Wildlife Corridors and Native Wildlife Nursery Sites 20
7.5 Local Policies and Ordinances 20

7.6 Habitat Conservation Plans 21
8.0 REFERENCES 22

LIST OF TABLES

Table 1. Summary of Biological Resources Evaluation 3
Table 2. Rating Narratives for Tree Assessment 12
Table 3. Vegetation Community and Land Cover Types 14
Table 4. Tree Assessment Results Summary 17

LIST OF PHOTOS

Photo 1. Photograph of typical developed area on-site. 15
Photo 2. Photograph of typical Landscaped/Ruderal area on-site. 15

LIST OF APPENDICES

Appendix A – Figures
- Figure 1. Project Area Location
- Figure 2. Aerial Photograph of Project Area
- Figure 3. Proposed Project Plan
- Figure 4. Project Area Soils
- Figure 5. Natural Communities and Land Cover within the Project Area

Appendix B – Species Documented within and around the Project Area
Appendix C – Representative Photographs of the Project Area
Appendix D – Special-Status Species Potential Table
Appendix E – Tree Report

LIST OF PREPARERS

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Matthew Schliebe – Wildlife Biologist
Carla Angulo – Arborist
Neal Jander – GIS Analyst

LIST OF ACRONYMS

BCC	USFWS Birds of Conservation Concern
BGEPA	Bald and Golden Eagle Protection Act
BIOS	Biogeographic Information and Observation System
BRA	Biological Resources Assessment
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act

CFGC	California Fish and Game Code
CFP	California Fully Protected Species
CFR	Code of Federal Regulations
CNDDB	California Natural Diversity Database
CNPPA	California Native Plant Protection Act
CNPS	California Native Plant Society
County	County of San Benito
Corps	U.S. Army Corps of Engineers
CRLF	California Red-legged Frog
CSRL	California Soils Resources Lab
CTS	California Tiger Salamander
CWA	Clean Water Act
EFH	Essential Fish Habitat
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
ESA	Federal Endangered Species Act
Magnuson-Stevens Act	Magnuson-Stevens Fishery Conservation & Management
MBTA	Migratory Bird Treaty Act
NOAA	National Oceanic and Atmospheric Administration
NMFS	National Marine Fisheries Service
NRCS	Natural Resource Conservation Service
NWI	National Wetland Inventory
NWPL	National Wetland Plant List
OHWM	Ordinary High Water Mark
Quarry	A.R. Wilson Graniterock Quarry
Rank	California Rare Plant Ranks
RWQCB	Regional Water Quality Control Board
SSC	Species of Special Concern
SSI	Special-status Invertebrates
SWRCB	State Water Resource Control Board
TOB	Top of Bank
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WBWG	Western Bat Working Group
WRA	WRA, Inc.

1.0 INTRODUCTION

This Biological Technical Report evaluates existing biological resources, potential impacts, and mitigation measures (if required) for the 15825 Roxford Street Project (Project) located in the Sylmar Community Plan Area of the City of Los Angeles, CA (Figure 1, Appendix A). The proposed project involves the construction of two new industrial buildings with a combined warehouse use area of 589,000 square feet and a combined ancillary office use area of 15,000 square feet.

1.1 Overview and Purpose

This report provides an assessment of biological resources within the Project Area and immediate vicinity. The purpose of the assessment was to develop and gather information on sensitive biological communities and special-status plant and wildlife species to support an evaluation of the Project under the California Environmental Quality Act (CEQA). This report describes the results of the site visit, which assessed the Project Area for (1) the presence of sensitive biological communities, special-status plant species, and special-status wildlife species, (2) the potential for the site to support special-status plant and wildlife species. Based on the results of the site assessment, potential impacts to sensitive biological communities and special-status species resulting from the proposed project were evaluated. If the project has the potential to result in significant impacts to these biological resources, measures to avoid, minimize, or mitigate for those significant impacts are described.

A biological resources assessment provides general information on the presence, or potential presence, of sensitive species and habitats. This assessment is based on information available at the time of the study and on-site conditions that were observed on the dates the site was visited. Conclusions are based on currently available information used in combination with the professional judgement of the biologists completing this study.

1.2 Project Description

The Project proposes to construct two new industrial buildings containing a total of 589,600 square feet of warehouse uses and 15,000 square feet of ancillary office uses. Building 1 would consist of 430,000 square feet of warehouse space and 10,000 square feet of office space. Building 2 would consist of 159,600 square feet of warehouse space and 5,000 square feet of office space. The 27.93-acre Project site is located in the heart of an existing industrial/manufacturing district and is therefore bounded by a number of similar industrial/manufacturing uses. An eastern portion of the Project site has frontage along Telfair Avenue, and a long driveway also connects the site to Roxford Street. To the west, the Project site borders the Golden State Freeway.

The Project site is currently improved with 182,230 square feet of warehouse uses, as well as surface parking area and driveways in support of these uses. Ancillary uses include four athletic courts for tennis and basketball. Most of these uses would be demolished or extensively modified for the Project.

1.3 Summary of Results

Although no active or old bird nests were observed during the site assessment, the proposed Project has the potential to result in significant impacts to birds, eggs, and nests that are protected by the MBTA and CFGC if active nests are present within or near the Project Area during construction. Implementation of Mitigation Measure BIO-1 would reduce potential impacts to nesting birds to less-than-significant levels

by ensuring that pre-construction nesting bird surveys are conducted to determine the presence or absence of protected nesting bird species in or near the Project Area prior to the commencement of ground-disturbing activities. If active nests are discovered, this mitigation measure establishes criteria that will require avoidance of the nests until a qualified biologist determines that the nest is no longer active or that the juveniles from the occupied nest have fledged and are capable of surviving independently from the nest.

A total of five protected trees are expected to be removed with a total of 51.36 inches DBH. Implementation of Mitigation Measure LOC-1 would reduce impacts to protected trees to less than a significant level by replacing each protected tree that is approved for removal with a minimum of four trees of the same protected genus as the removed tree, each of a minimum 15-gallon container size. In addition, the 15-gallon saplings should also be 1-inch at 1 foot trunk height and replace the value of the removed trees. Therefore, removal of the five protected trees may require tree replacement of a minimum of 20 or 52 native saplings of the same protected genus. The 52 are calculated using the total inches possibly impacted and multiplying by the 1-inch minimum requirement.

TABLE 1. SUMMARY OF BIOLOGICAL RESOURCES EVALUATION

CEQA ASSESSMENT CATEGORY[1] IV. -BIOLOGICAL RESOURCES	BIOLOGICAL RESOURCES CONSIDERED	RELEVANT LAWS AND REGULATIONS	RESPONSIBLE REGULATORY AGENCY	SUMMARY OF FINDINGS & REPORT SECTION[2]
Question A. Special-status species	Special-status Plants Special-status Wildlife Designated Critical Habitat	Federal Endangered Species Act California Endangered Species Act California Native Plant Protection Act Migratory Bird Treaty Act Bald and Golden Eagle Protection Act	U.S. Fish and Wildlife Service National Marine Fisheries Service California Department of Fish and Wildlife	Potentially significant impacts were identified, and mitigation measures are included that reduce those impacts to a level that is less than significant. **See Section 7.1 for more information**
Question B. Sensitive natural communities & riparian habitat	Sensitive Natural Communities Streams, Lakes, & Riparian Habitat	California Fish and Game Code Oak Woodland Conservation Act Porter-Cologne Act Clean Water Act	California Department of Fish and Wildlife U.S. Army Corps of Engineers U.S. Environmental Protection Agency State Water Resources Control Board Regional Water Quality Control Board	No potentially significant impacts were identified, and mitigation is not required. **See Section 7.2 for more information**
Question C. State and federally protected wetlands	Wetlands Unvegetated surface waters	Clean Water Act Sections 404/401 Rivers and Harbors Act Section 10 Porter Cologne Act	U.S. Army Corps of Engineers U.S. Environmental Protection Agency State Water Resources Control Board Regional Water Quality Control Board	No potentially significant impacts were identified, and mitigation is not required. **See Section 7.3 for more information**

[1] *CEQA Questions have been summarized here; see Section 6.2 for details.*

[2] *As given in this report; see Section 7.0 subheadings*

Question D. Fish & wildlife corridors	Essential Fish Habitat Wildlife Corridors	California Fish and Game Code Magnuson-Stevens Fishery Conservation & Management Act	California Department of Fish and Wildlife National Marine Fisheries Service	No potentially significant impacts were identified, and mitigation is not required. **See Section 7.4 for more information**
Question E. Local policies	Protected Trees Coastal zone resources Other biological protections	Local Tree Ordinance General Plan (e.g., Stream & Wetland Setbacks) Local ordinances	Local and regional agencies California Coastal Commission San Francisco Bay Conservation and Development Commission	Potentially significant impacts were identified, and mitigation measures are included that reduce those impacts to a level that is less than significant. **See Section 7.5 for more information**
Question F. Local, state, federal conservation plans	Habitat Conservation Plans Natural Community Conservation Plans	Federal Endangered Species Act Natural Community Conservation Planning Act	U.S. Fish and Wildlife Service California Department of Fish and Wildlife	Potentially significant impacts were identified, and mitigation measures are included that reduce those impacts to a level that is less than significant. **See Section 7.6 for more information**

2.0 REGULATORY BACKGROUND

The following sections explain the regulatory context of the biological assessment, including applicable laws and regulations that were applied to the field investigations and analysis of potential project impacts. Table 1 shows the correlation between these regulations and each Biological Resources question in the Environmental Checklist Form (Appendix G) of the CEQA guidelines.

2.1 Federal and State Regulatory Setting

2.1.1 Vegetation and Aquatic Communities

CEQA provides protections for particular vegetation types defined as sensitive by the California Department of Fish and Game (CDFW), and aquatic communities protected by laws and regulations administered by the U.S Army Corps of Engineers (Corps), State Water Resources Control Board (SWRCB), and Regional Water Quality Control Boards (RWQCB). The laws and regulations that provide protection for these resources are summarized below.

Sensitive Natural Communities: Sensitive natural communities include habitats that fulfill special functions or have special values. Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by the CDFW. CDFW ranks sensitive communities as "threatened" or "very threatened" (CDFW 2021a) and keeps records of their occurrences in its California Natural Diversity Database (CNDDB; CDFW 2021b). Vegetation alliances are ranked 1 through 5 in the CNDDB based on NatureServe's (2020) methodology, with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified in local or regional plans, policies, or regulations or those identified by the CDFW or U.S. Fish and Wildlife Service (USFWS) must be considered and evaluated under CEQA (CCR Title 14, Div. 6, Chap. 3, Appendix G). In addition, this general class includes oak woodlands that are protected by local ordinances under the Oak Woodlands Protection Act.

Waters of the United States, Including Wetlands: The Corps regulates “Waters of the United States” under Section 404 of the Clean Water Act (CWA). Waters of the United States are defined in the Code of Federal Regulations (CFR) as including the territorial seas, and waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, such as tributaries, lakes and ponds, impoundments of waters of the U.S., and wetlands that are hydrologically connected with these navigable features (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands as defined in the *U.S. Army Corps of Engineers Wetlands Delineation Manual* (Corps Manual; Environmental Laboratory 1987), are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Unvegetated waters including lakes, rivers, and streams may also be subject to Section 404 jurisdiction and are characterized by an ordinary high water mark (OHWM) identified based on field indicators such as the lack of vegetation, sorting of sediments, and other indicators of flowing or standing water. The placement of fill material into Waters of the United States generally requires a permit from the Corps under Section 404 of the CWA.

The Corps also regulates construction in navigable waterways of the U.S. through Section 10 of the Rivers and Harbors Act (RHA) of 1899 (33 USC 403). Section 10 of the RHA requires Corps approval and a permit for excavation or fill, or alteration or modification of the course, location, condition, or capacity of, any port, roadstead, haven, harbor, canal, lake, harbor or refuge, or enclosure within the limits of any breakwater, or of the channel of any navigable water of the United States. Section 10 requirements apply

only to navigable waters themselves, and are not applicable to tributaries, adjacent wetlands, and similar aquatic features not capable of supporting interstate commerce.

Waters of the State, Including Wetlands: The term "Waters of the State" is defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The SWRCB and nine RWQCB protect waters within this broad regulatory scope through many different regulatory programs. Waters of the State in the context of a CEQA Biological Resources evaluation include wetlands and other surface waters protected by the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (SWRCB 2019). The SWRCB and RWQCB issue permits for the discharge of fill material into surface waters through the State Water Quality Certification Program, which fulfills requirements of Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. Projects that require a Clean Water Act permit are also required to obtain a Water Quality Certification. If a project does not require a federal permit but does involve discharge of dredge or fill material into surface waters of the State, the SWRCB and RWQCB may issue a permit in the form of Waste Discharge Requirements.

Sections 1600-1616 of California Fish and Game Code: Streams and lakes, as habitat for fish and wildlife species, are regulated by CDFW under Sections 1600-1616 of California Fish and Game Code (CFGC). Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term "stream," which includes creeks and rivers, is defined in the California Code of Regulations (CCR) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life [including] watercourses having a surface or subsurface flow that supports or has supported riparian vegetation" (14 CCR 1.72). The term "stream" can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife (CDFG 1994). Riparian vegetation has been defined as "vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself" (CDFG 1994). Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFW.

2.1.2 Special-status Species

Endangered and Threatened Plants, Fish, and Wildlife. Specific species of plants, fish, and wildlife species may be designated as threatened or endangered by the federal Endangered Species Act (ESA), or the California Endangered Species Act (CESA). Specific protections and permitting mechanisms for these species differ under each of these acts, and a species' designation under one law does not automatically provide protection under the other.

The ESA (16 USC 1531 et seq.) is implemented by the USFWS and the National Marine Fisheries Service (NMFS). The USFWS and NMFS maintain lists of endangered and threatened plant and animal species (referred to as "listed species"). "Proposed" or "candidate" species are those that are being considered for listing and are not protected until they are formally listed as threatened or endangered. Under the ESA, authorization must be obtained from the USFWS or NMFS prior to take of any listed species. "Take" under the ESA is defined as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Take under the ESA includes direct injury or mortality to individuals, disruptions in normal behavioral patterns resulting from factors such as noise and visual disturbance, and impacts to habitat for listed species. Actions that may result in take of an ESA-listed

species may obtain a permit under ESA Section 10, or via the interagency consultation described in ESA Section 7. Federally listed plant species are only protected when take occurs on federal land.

The ESA also provides for designation of critical habitat, which are specific geographic areas containing physical or biological features "essential to the conservation of the species." Protections afforded to designated critical habitat apply only to actions that are funded, permitted, or carried out by federal agencies. Critical habitat designations do not affect activities by private landowners if there is no other federal agency involvement.

The CESA (CFGC 2050 et seq.) prohibits the take of any plant and animal species that the CFGC determines to be an endangered or threatened species in California. CESA regulations include take protection for threatened and endangered plants on private lands, as well as extending this protection to candidate species that are proposed for listing as threatened or endangered under CESA. The definition of a "take" under CESA ("hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") only applies to direct impact to individuals, and does not extend to habitat impacts or harassment. CDFW may issue an Incidental Take Permit under CESA to authorize take if it is incidental to otherwise lawful activity and if specific criteria are met. Take of these species is also authorized if the geographic area is covered by a Natural Community Conservation Plan (NCCP), as long as the NCCP covers that activity.

Fully Protected Species and Designated Rare Plant Species. This category includes specific plant and wildlife species that are designated in the CFGC as protected even if not listed under CESA or ESA. Fully Protected Species includes specific lists of birds, mammals, reptiles, amphibians, and fish designated in CFGC. Fully protected species may not be taken or possessed at any time. No licenses or permits may be issued for take of fully protected species, except for necessary scientific research and conservation purposes. The definition of "take" is the same under the California Fish and Game Code and the CESA. By law, CDFW may not issue an Incidental Take Permit for Fully Protected Species. Under the California Native Plant Protection Act (NPPA), CDFW has listed 64 "rare" or "endangered" plant species, and prevents "take", with few exceptions, of these species. CDFW may authorize take of species protected by the NPPA through the Incidental Take Permit process, or under a NCCP.

Special Protections for Nesting Birds and Bats. The federal Bald and Golden Eagle Protection Act provides relatively broad protections to both of North America's eagle species (bald eagle [*Haliaeetus leucocephalus*] and golden eagle [*Aquila chrysaetos*)] that in some regards are similar to those provided by the ESA. In addition to regulations for special-status species, most native birds in the United States, including non-status species, have baseline legal protections under the Migratory Bird Treaty Act of 1918 and CFGC, i.e., sections 3503, 3503.5 and 3513. Under these laws/codes, the intentional harm or collection of adult birds as well as the intentional collection or destruction of active nests, eggs, and young is illegal. For bat species, the Western Bat Working Group (WBWG) designates conservation status for species of bats, and those with a high or medium-high priority are typically given special consideration under CEQA.

Essential Fish Habitat. The Magnuson-Stevens Fishery Conservation and Management Act provides for conservation and management of fishery resources in the U.S., administered by NMFS. This Act establishes a national program intended to prevent overfishing, rebuild overfished stocks, ensure conservation, and facilitate long-term protection through the establishment of Essential Fish Habitat (EFH). EFH consists of aquatic areas that contain habitat essential to the long-term survival and health of fisheries, which may include the water column, certain bottom types, vegetation (e.g., eelgrass (*Zostera* spp.)), or complex structures such as oyster beds. Any federal agency that authorizes, funds, or undertakes action that may adversely affect EFH is required to consult with NMFS.

Species of Special Concern, Movement Corridors, and Other Special-status Species under CEQA. To address additional species protections afforded under CEQA, CDFW has developed a list of special species as "a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status." This list includes lists developed by other organizations, including for example, the Audubon Watch List Species, the Bureau of Land Management Sensitive Species, and USFWS Birds of Special Concern. Plant species on the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants (Inventory) with California Rare Plant Ranks (Rank) of 1 and 2, as well as some with a Rank of 3, are also considered special-status plant species and must be considered under CEQA. Some Rank 3 species and all Rank 4 species are typically only afforded protection under CEQA when such species are particularly unique to the locale (e.g., range limit, low abundance/low frequency, limited habitat) or are otherwise considered locally rare. Movement and migratory corridors for native wildlife (including aquatic corridors) as well as wildlife nursery sites are given special consideration under CEQA.

2.2 Local Plans and Policies

City of Los Angeles General Plan Conservation Element. As detailed in the Conservation Element of the City of Los Angeles General Plan, the element surveys laws, requirements and procedures which have been established for protection of natural resources. It primarily is an informational document which is designed to help readers understand the context, history and opportunities for protection and improvement of the city's natural resources. (City of Los Angeles Department of City Planning, 2018a, p. viii)

City of Los Angeles Preservation of Protected Trees. The City of Los Angeles recognizes the aesthetic, environmental, and economic benefits mature trees provide to the citizens of the City. Article 6 Section 46.01, "Preservation of Protected Trees" of the City of Los Angeles Municipal Code (Tree Ordinance) regulates the protection of certain trees on public and private properties within the City limits. The ordinance defines a "protected tree" as any "of the following Southern California indigenous tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub" (Los Angeles Municipal Code 2021):

- Protected Trees: (a) Oak tree including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus berberidifolia), (b) Southern California Black Walnut (Juglans californica), (c) Western Sycamore (Platanus racemosa) and (d) California Bay (Umellularia californica).
- Protected Shrubs: (a) Mexican Elderberry (Sambucus mexicana) and (b) Toyon (Heteromeles arbutifolia).
- This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

Article 7 Section 17.02 and 17.05 are the "Division of Land Regulations" and have stipulations when tree removals are possible in a land development site and it states that the replacing protected trees may be required depending on the Advisory Agency and joint consultation from the City's Chief Forester as described in the following excerpt from Article 7 Section 17.05:

"The Advisory Agency may require relocation elsewhere on the same property where a protected tree or shrub has been approved for removal, and where the relocation is economically reasonable and favorable to the survival of the tree or shrub. Relocation to a site other than upon the same property may be permitted where there is no available or appropriate location on the property and the owner of the proposed off-site relocation site consents to the placement of a tree or shrub. In the event of relocation, the Advisory Agency may designate measures to be taken to mitigate adverse effects on the tree or shrub. (a) Permit protected trees or shrubs of a lesser size, or trees or shrubs of a different protected species, to be planted as replacement trees or shrubs for protected trees or shrubs permitted by this Code to be removed or relocated, if replacement trees or shrubs required pursuant to this Code are not available. In that event, the Advisory Agency may require a greater number of replacement trees or shrubs." Los Angeles Municipal Code 2021

3.0 ASSESSMENT METHODOLOGY

On February 15, 2022, a WRA, Inc. (WRA) biologist visited the Project Area to map vegetation, aquatic communities, unvegetated land cover types, document plant and wildlife species present, and evaluate on-site habitat for the potential to support special-status species as defined by CEQA. Prior to the site visit, WRA biologists reviewed literature resources and performed database searches to assess the potential for sensitive biological communities (e.g., wetlands) and special-status species (e.g., endangered plants), including:

- Soil Survey of Los Angeles County, California, West San Fernando Valley Area (USDA 2021)
- San Fernando 7.5-minute U.S. Geological Survey (USGS) quadrangle (USGS 2022)
- Contemporary aerial photographs (Google Earth 2022)
- Historical aerial photographs (NETR 2020)
- National Wetlands Inventory (USFWS 2020a)
- California Aquatic Resources Inventory (SFEI 2017)
- CNDDB (CDFW 2021b)
- CNPS Inventory (CNPS 2020)
- Consortium of California Herbaria (CCH1 2021, CCH2 2021)
- USFWS List of Federal Endangered and Threatened Species (USFWS 2020b)
- eBird Online Database (eBird 2018)
- CDFW Publication, California Bird Species of Special Concern in California (Shuford and Gardali 2008)
- CDFW and University of California Press publication California Amphibian and Reptile Species of Special Concern (Thomson et al. 2016)
- A Field Guide to Western Reptiles and Amphibians (Stebbins 2003)
- A Manual of California Vegetation, Online Edition (CNPS 2020)
- Preliminary Descriptions of the Terrestrial Natural Communities (Holland 1986)
- California Natural Community List (CDFW 2021a)
- Database searches (i.e., CNDDB, CNPS) for special-status species focused on the XYZA USGS 7.5-minute quadrangles.

Following the remote assessment, WRA biologists completed a field review over the course of one days to document: (1) land cover types (e.g., terrestrial communities, aquatic resources), (2) existing conditions and to determine if such provide suitable habitat for any special-status plant or wildlife species, (3) if and

what type of aquatic natural communities (e.g., wetlands) are present, and (4) if special-status species are present[3].

3.1 Vegetation Communities and Other Land Cover Types

During the site visit, WRA evaluated the species composition and area occupied by distinct vegetation communities, aquatic communities, and other land cover types. Mapping of these classifications utilized a combination of aerial imagery and ground surveys. In most instances, communities are characterized and mapped based on distinct shifts in plant assemblage (vegetation) and follow the California Natural Community List (CDFW 2021a) and A Manual of California Vegetation, Online Edition (CNPS 2020). These resources cannot anticipate every component of every potential vegetation assemblage in California, and so in some cases, it is necessary to identify other appropriate vegetative classifications based on best professional judgment of WRA biologists. When undescribed variants are used, it is noted in the description. Vegetation alliances (natural communities) with a CDFW Rank of 1 through 3 (globally critically imperiled [S1/G1], imperiled [S2/G2], or vulnerable [S3/G3]) (CDFW 2021a), were evaluated as sensitive as part of this evaluation.

The site was reviewed for the presence of wetlands and other aquatic resources according to the methods described in the Corps Manual (Environmental Laboratory 1987), the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West* (Arid West; Corps 2008), and A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States (Lichvar and McColley 2008). Areas meeting these indicators were mapped as aquatic resources and categorized using the vegetation community classification methods described above. Aquatic communities which are mapped in the NMFS EFH Mapper (NMFS 2020) or otherwise meet criteria for designation as EFH are indicated as such in the community description below in Section 5.1. The presence of riparian habitat was evaluated based on woody plant species meeting the definition of riparian provided in *A Field Guide to Lake and Streambed Alteration Agreements, Section 1600-1607, California Fish and Game Code* (CDFG 1994) and based on best professional judgement of biologists completing the field surveys.

3.2 Special-status Species

Potential occurrence of special-status species in the Project Area was evaluated by first determining which special-status species occur in the vicinity of the Project Area through a literature and database review as described above. Presence of suitable habitat for special-status species was evaluated during the site visit based on physical and biological conditions of the site as well as the professional expertise of the investigating biologists. The potential for each special-status species to occur in the Project Area was then determined according to the following criteria:

- **No Potential.** Habitat on and adjacent to the site is clearly unsuitable for the species requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).

[3] *Due to the timing of the assessment, it may or may not constitute protocol-level species surveys; see Section 5.1 if the site assessment would constitute a formal or protocol-level species survey.*

- **Unlikely.** Few of the habitat components meeting the species requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to be found on the site.

- **Moderate Potential.** Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of being found on the site.

- **High Potential.** All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of being found on the site.

- **Present.** Species is observed on the site or has been recorded (i.e., CNDDB, other reports) on the site in the recent past.

If a more thorough assessment was deemed necessary, a targeted or protocol-level assessment or survey was conducted or recommended as a future study. If a special-status species was observed during the site visit, its presence was recorded and discussed below in Section 5.2. If designated critical habitat is present for a species, the extent of critical habitat present and an evaluation of critical habitat elements is provided as part of the species discussions below.

3.3 Wildlife Corridors and Native Wildlife Nursery Sites

To account for potential impacts to wildlife movement/migratory corridors, biologists reviewed maps from the California Essential Connectivity Project (CalTrans 2010), and habitat connectivity data available through the CDFW Biogeographic Information and Observation System (BIOS; CDFW 2020). Additionally, aerial imagery (Google 2020) for the local area was referenced to assess if local core habitat areas were present within, or connected to the Project Area. This assessment was refined based on observations of on-site physical and/or biological conditions, including topographic and vegetative factors that can facilitate wildlife movement, as well as on-site and off-site barriers to connectivity.

The potential presence of native wildlife nursery sites is evaluated as part of the site visit and discussion of individual wildlife species below. Examples of native wildlife nursery sites include nesting sites for native bird species (particularly colonial nesting sites), marine mammal pupping sites, and colonial roosting sites for other species (such as for monarch butterfly [*Danaus plexippus*]).

3.4 Protected Trees

On October 21, 2021, the Project Area was traversed on foot to inventory all trees as defined per the City of Los Angeles Tree Ordinance. WRA's ISA-Certified Arborist surveyed the area and recorded relevant tree information for each surveyed tree including species, DBH, estimated crown radius, estimated height, and health, condition, and structure ratings. The full tree survey report is included as Appendix E.

3.4.1 Tree Inventory

Locations of trees within the Project Area were recorded using a handheld GPS unit with sub-meter accuracy. Each tree was given an aluminum tree tag with unique identification number, unless the tree was not safely within reach or in a restricted section of the Project Area.

DBH was calculated for surveyed trees by measuring the trunk diameter at 4.5 ft. above grade. DBH for multi-trunked trees was calculated by measuring each individual trunk and calculating the sum total of trunk diameters. In cases where multi-trunked trees had more than five main trunks, only the five largest trunks were measured. In cases where an irregular buttress or bulge occurred at two feet above ground or DBH, measurements were taken above or below the irregular feature in order to best represent the size of the tree.

3.4.2 Tree Assessment

General notes on the condition of trees were taken, including health, structure, and overall condition. Assessment of the health, structure, and overall condition of each tree was conducted according to the narratives listed in Table 1.

TABLE 2. RATING NARRATIVES FOR TREE ASSESSMENT

HEALTH	
Good	Tree is free from symptoms of disease and stress.
Fair	Tree shows some symptoms of disease or stress including twig and small branch dieback, evidence of fungal / parasitic infection, thinning of crown, or poor leaf color.
Poor	Tree shows symptoms of severe decline.
STRUCTURE	
Good	Tree is free from major structural defects.
Fair	Tree shows some structural defects in branches but overall structure is stable.
Poor	Tree shows structural failure of a major branch or co-dominant trunk.
GENERAL CONDITION	
Good	Tree shows condition of foliage, bark, and overall structure characteristic of the species and lacking obvious defect, or disease.
Fair	Tree shows condition of foliage, bark, and overall structure characteristic of the species with some evidence of stress, defect, or disease.
Poor	Tree shows condition of foliage, bark, and overall structure uncharacteristic of the species with obvious evidence of stress, defect, or disease.

3.4.3 Tree Impact Assessment and Mitigation Requirements

Potential impacts to all trees were analyzed by comparing tree survey data with the Project's conceptual site plan (XEBEC 2022). The conceptual design and plan is "based on a preliminary review of entitlement requirements and is intended merely to assist in exploring how the project might be developed" (XEBEX 2022). Potential tree impacts that may require a permit from the City of Los Angeles include removal or encroachment into the dripline of any tree. The results of the impacts assessment are provided below and shown in Appendix A.

As described above, tree relocation or replacement may be required by the City for tree removals associated with development projects. If the Advising Agency along with the City's Chief Forester decide to have the trees relocated or replaced the excerpt of Article 7 Section 17.05 below explains the conditions:

1. The protected tree or shrub be replaced within the property by at least four specimens of a protected variety included within the definition set forth in Section 17.02 of this article, except

where the protected species is relocated pursuant to Subdivision 2(a) above. A protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works (Board), or a licensed or certified arborist. When replacement concerns more than two protected trees or shrubs, the permit at issue shall be considered at a full public hearing at the Board. The size of each replacement tree shall be a 15-gallon or larger specimen, measuring one inch or more in diameter at a point one foot above the base, and not less than 7 feet in height, measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced.

2. The subdivider record those covenants and agreements approved by the Advisory Agency to assure compliance with conditions imposed by the Advisory Agency and to assure protected tree and shrub preservation.
3. The subdivider provide protected tree and shrub maintenance information to purchasers of lots within the proposed subdivision.
4. The subdivider post a bond or other assurance acceptable to the City Engineer to guarantee the survival of trees and shrubs required to be replaced or permitted or required to be relocated, in a manner to assure the existence of continuously living trees and shrubs at the approved replacement or relocation site for three years from the date that the trees or shrubs are replaced or relocated. The City Engineer shall use the provisions of Section 17.08 G as its procedural guide in satisfaction of the bond requirements and processing. Any bond required shall be in a sum estimated by the City Engineer to be equal to the dollar value of the replacement tree or shrub or of the tree or shrub that is to be relocated. In determining value for these purposes, the City Engineer shall consult with the Advisory Agency, the City's Chief Forester, the evaluation of trees guidelines approved and adopted for professional plantsmen by the International Society of Arboriculture, the American Society of Consulting Arborists, the National Arborists Association and the American Association of Nurserymen, and other available local information or guidelines.

4.0 ECOLOGICAL SETTING

The approximately 28-acre Project Area is located west of Tefair Avenue and north of Roxford Street, and it is addressed at 15825 Roxford Street within the Sylmar neighborhood in the City of Los Angeles. The Project Area is located south of the Saddletree Open Space and the Foothill Highway and east of the Yarnell Debris Basin and the Golden State Highway. Additional details of the local setting are below.

4.1 Soils and Topography

The overall topography of the Project Area is flat with elevations ranging from approximately 1,200 to 1,275 feet above sea level. According to the *Soil Survey of Los Angeles County, California, West San Fernando Valley Area* (USDA 2021), the Project Area is underlain by two soil mapping units: Chualar-Urban land complex, 2 to 9 percent slopes and Soper gravelly sandy loam, 15 to 30 percent slopes. Soils within the Project Area are shown in Appendix A – Figure 4. The parent soil series of all the Project Area's mapping units are summarized below.

<u>Chualar Series</u>: This series consist of very deep, well drained soils formed in alluvial material from mixed rock sources, and are on terraces and fans of the coastal areas with slopes of 0 to 9 percent (USDA 2021).

These soils are not considered hydric, and are well drained with low runoff, and moderately high permeability (USDA 2021).

Soper Series: This series consists of moderately deep, well drained soils that formed in material weathered from conglomerate and sandstone, and are on hills and uplands with slopes of 15 to 50 percent (USDA 2021). These soils are not considered hydric, and are well drained with very high runoff, and very low to moderately low permeability (USDA 2021).

4.2 Climate and Hydrology

The Project Area is located in San Fernando Valley Groundwater Basin. The average monthly maximum temperature in the area is 77.5 degrees Fahrenheit, while the average monthly minimum temperature is 52.1 degrees Fahrenheit. Predominantly, precipitation falls as rainfall between October and May with an annual average precipitation of 17.6 inches.

The local watershed is Bull Creek (HUC 12: 180701050204) and the regional watershed is Los Angeles (HUC 8: 18070105). The Project Area is located in the central portion of the Bull Creek watershed. There are no blue-line streams in the Project Area (USGS 2018). The Project Area contains no mapped resources in the NWI (USFWS 2020a) and California Aquatic Resources Inventory (CARI; SFEI 2017).

4.3 Land-use

The majority of the Project Area is developed. Undeveloped areas consist of ruderal vegetation and landscaping. Developed areas include industrial buildings, roads, and parking lots. Detailed plant community descriptions are included in Section 5.1 below, and all observed plant species are included in Appendix B. The Project Area is adjacent to the Golden State Highway on its southwest border, and it is surrounded by industrial buildings on its other borders (Google Earth 2022). Historically, the Project Area was used for agriculture (NETR 2022).

5.0 ASSESSMENT RESULTS

5.1 Vegetation Communities and Other Land Cover

WRA observed two land cover types within the Project Area: developed and ruderal/landscaped. Land cover types within the Project Area are illustrated in Figure A-4 (Appendix A). Both land cover types found within the Project Area are non-sensitive land cover types.

TABLE 3. VEGETATION COMMUNITY AND LAND COVER TYPES

COMMUNITY/LAND COVERS	SENSITIVE STATUS	RARITY RANKING	ACRES WITHIN PROJECT AREA
Terrestrial Community/Land Cover			
Developed	None	None	18.98
Landscaped/Ruderal	None	None	8.89

5.1.1 Terrestrial Land Cover

Developed Area (no vegetation alliance). CDFW Rank: None. Approximately two thirds of the Project Area is developed industrial buildings, roads, and parking lots. The developed areas total 18.98 acres in the Project Area (68.1 percent) of the total land cover type in the property). In the developed areas, the vegetation is minimal or non-existant. This community is not considered sensitive by the City of Los Angeles, CDFW, or any other regulatory entity.

PHOTO 1. PHOTOGRAPH OF TYPICAL DEVELOPED AREA ON-SITE.

Landscaped/Ruderal (no vegetation alliance). CDFW Rank: None. Approximately one third of the Project Area is landscaped/ruderal and consists primarily of ornamental and invasive, non-native species. The landscaped/ruderal areas total 8.89 acres in the Project Area (31.9 percent of the total land cover type in the property). In the landscaped/ruderal areas the vegetation is mainly composed of Eucalyptus (*Eucalyptus* spp.) and common weeds such foxtail barley (*Hordeum murinum*), and fountaingrass (*Pennisetum setaceum*). This community is not considered sensitive by the City of Los Angeles, CDFW, or any other regulatory entity.

PHOTO 2. PHOTOGRAPH OF TYPICAL LANDSCAPED/RUDERAL AREA ON-SITE.

5.1.2 Aquatic Resources

Aquatic resources were not observed within the Project Area.

5.2 Special-status Species

5.2.1 Special-status Plants

Based upon a review of the resource databases listed in Section 3.0, 11 special-status plant species have been documented in the vicinity of the Project Area. All 11 of these species documented from the greater vicinity are unlikely or have no potential to occur for one or more of the following:

- Hydrologic conditions (e.g., tidal, riverine) necessary to support the special-status plant species are not present in the Project Area;
- Edaphic (soil) conditions (e.g., volcanic tuff, serpentine) necessary to support the special-status plant species are not present in the Project Area;
- Topographic conditions (e.g., north-facing slope, montane) necessary to support the special-status plant species are not present in the Project Area;
- Unique pH conditions (e.g., alkali scalds, acidic bogs) necessary to support the special-status plant species are not present in the Project Area;
- Associated natural communities (e.g., interior chaparral, tidal marsh) necessary to support the special-status plant species are not present in the Project Area;

- The Project Area is geographically isolated (e.g. below elevation, coastal environ) from the documented range of the special-status plant species;
- The historical landscape and/or habitat(s) of the Project Area were not suitable habitat prior to land/type conversion (e.g., reclaimed shoreline) to support the special-status plant species;
- Land use history and contemporary management (e.g., grading, intensive grazing) has degraded the localized habitat necessary to support the special-status plant species.

5.2.2 Special-status Wildlife

Based upon a review of the resource databases listed in Section 3.0, 30 special-status wildlife species have been documented in the vicinity of the Project Area. All of these are excluded from the Project Area based on a lack of habitat features. Features not found within the Project Area that are required to support special-status wildlife species include:

- Vernal pools
- Perennial aquatic habitat (e.g. streams, rivers or ponds)
- Tidal marsh areas
- Old growth redwood or fir forest
- Serpentine soils to support host plants
- Sandy beaches or alkaline flats
- Presence of specific host plants
- Caves, mine shafts, or abandoned buildings

The absence of such habitat features eliminates components critical to the survival or movement of most special-status species found in the vicinity. For instance, least Bell's vireo (*Vireo bellii pusillus*) is known to occur in the open spaces in the vicinity. However, suitable riparian forest habitat and movement corridors connecting the Project Area to source populations are absent, precluding this species from existing on the Project Area. Given the Project Area's relative proximity to sensitive habitats in the San Gabriel mountains, many species documented nearby are additionally obligates to habitats which are not present on or in the immediate vicinity of the Project Area.

5.3 Wildlife Corridors and Native Wildlife Nursery Sites

No native wildlife nursery sites are present in the Project Area.

Wildlife movement between suitable habitat areas can occur via open space areas lacking substantial barriers. The terms "landscape linkage" and "wildlife corridor" are often used when referring to these areas. The key to a functioning corridor or linkage is that it connects two larger habitat blocks, also referred to as core habitat areas (Beier and Loe 1992; Soulé and Terbough 1999). It is useful to think of a "landscape linkage" as being valuable in a regional planning context, a broad scale mapping of natural habitat that functions to join two larger habitat blocks. The term "wildlife corridor" is useful in the context of smaller, local area planning, where wildlife movement may be facilitated by specific local biological habitats or passages and/or may be restricted by barriers to movement. Above all, wildlife corridors must link two areas of core habitat and should not direct wildlife to developed areas or areas that are otherwise void of core habitat (Hilty et al. 2019).

The Project Area is not within a designated wildlife corridor (CalTrans 2010). The site is located within a much larger tract of residential, industrial, and commercial development within an urban portion of Los

Angeles County. While common wildlife species presumably utilize the site to some degree for movement at a local scale, the Project Area itself does not provide corridor functions beyond connecting similar agricultural/viticultural land parcels in surrounding areas.

5.4 Protected Trees

5.4.1 Tree Inventory

Five protected trees and 177 non-protected trees were identified within the Project Area. A complete list of all surveyed trees is presented in Appendix A. The GPS locations of surveyed trees and the status are shown in Appendix B. Protected trees present within the Project Area are coast live oak (*Quercus agrifolia*) ranging in size from 5.39 inches to 24.30 inches. Non-protected trees present included River red gum (*Eucalyptus camaldulensis*), Blue gum Eucalyptus (*Eucalyptus globulus*), Chinese elm (*Ulmus parvifolia*), Carob tree (*Ceratonia siliqua*), Canary island pine (*Pinus canariensis*), Italian stone pine (*Pinus pinea*), Aleppo pine (*Pinus halepensis*), Hollywood Juniper (*Juniperus chinensis*), Weeping bottlebrush (*Melaleuca viminalis*), White mulberry, (*Morus alba*), African weeping wattle (*Peltophorum africanum*), Italian cypress (*Cupressus sempervirens*), Modesto ash (*Fraxinus velutina*), sweetgum (*Liquidambar styraiflua*), Laurel Sumac (*Malosma laurina*), Brazilian pepper tree (*Schinus terebonthifolia*), Gold medallion tree (*Cassia leptophylla*), Jacaranda (*Jacaranda mimosifolia*), olive (*Olea europaea*), glossy privet (*Ligustrum lucidum*), sugar bush (*Rhus ovata*), and Mexican fan palm (*Washingtonia robusta*). Non protected trees range in size from 4 inches to 88.29 inches in diameter (measured at 4.5 feet above ground). The largest tree surveyed was an 88.29-inch multi-trunk canary island pine (tree #336).

5.4.2 Tree Assessment

The condition, health, and structure of trees inventoried during this assessment ranged from poor to good, with most trees ranking fair in health, structure, and general condition. Most of the coast live oaks ranked fair in condition, good in health, and fair in structure. Most trees surveyed within the Project Area ranked good in general condition (51%), health (71%), and structure (47.5%) with most trees displaying only minimal signs of maladies or decline in vigor. Five percent ranked poor in health, including one dead Chinese elm. General maladies observed that lead to the health and condition rankings given below included leaning codominant trunks, minor to significant decay/dieback, major decay/dieback, suppressed and leaning growth forms, and poorly pruned trees leading to failures or dead branches. Tree rated poor for structure had large failures due to either structural damage due to mechanical injury while pruning or vehicle striking the trunk. Table 2 below summarizes the assessment results for all protected trees surveyed.

TABLE 4. TREE ASSESSMENT RESULTS SUMMARY

CRITERIA ASSESSED/RATING	CONDITION	HEALTH	STRUCTURE
Good	91 (51%)	126 (71%)	84 (47.5%)
Fair	43 (24%)	43 (24%)	84 (47.5%)
Poor	5 (3%)	8 (5%)	9 (5%)

6.0 ANALYTICAL METHODOLOGY AND SIGNIFICANCE THRESHOLD CRITERIA

Pursuant to Appendix G, Section IV of the State CEQA Guidelines, a project would have a significant impact on biological resources if it would:

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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;

3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means

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;

5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or,

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.

These thresholds were utilized in completing the analysis of potential project impacts for CEQA purposes. For the purposes of this analysis, a "substantial adverse effect" is generally interpreted to mean that a potential impact could directly or indirectly affect the resiliency or presence of a local biological community or species population. Potential impacts to natural processes that support biological communities and special-status species populations that can produce similar effects are also considered potentially significant. Impacts to individuals of a species or small areas of existing biological communities may be considered less than significant if those impacts are speculative, beneficial, de minimis, and/or would not affect the resiliency of a local population.

7.0 IMPACTS AND MITIGATION EVALUATION

Using the CEQA analysis methodology outlined in Section 6.2 above, the following section describes potential significant impacts to sensitive resources within the Project Area as well as suggested mitigation measures which are expected to reduce impacts to less than significant.

7.1 Special-status Species

This section analyzes the Project's potential impacts and mitigation for special-status species in reference to the significance threshold outlined in CEQA Appendix G, Part IV (a):

Does the project have the potential to 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 California Department of Fish and Game or U.S. Fish and Wildlife Service?

The Project Area consists of warehouse buildings, paved parking lots, and landscaped/ruderal areas, and does not have the potential to support special-status plant or wildlife species. The Project Area is highly disturbed. The site and immediately surrounding areas are urbanized and lack suitable habitat and refugia for special-status plant and wildlife species. In addition, the project site is associated with other urbanized land uses, which generate substantial noise and visual disturbance, limiting the suitability of the habitat for special-status species. No special status-species were documented or have the potential to occur in the Project Area; therefore, **no impacts** or mitigation are warranted for the proposed project.

Nesting Birds:

Although no active or old bird nests were observed during the site assessment, the proposed Project has the potential to result in significant impacts to birds, eggs, and nests that are protected by the MBTA and CFGC if active nests are present within or near the Project Area during construction. Implementation of Mitigation Measure BIO-2 would reduce potential impacts to nesting birds to less-than-significant levels by ensuring that pre-construction nesting bird surveys are conducted to determine the presence or absence of protected nesting bird species in or near the Project Area prior to the commencement of ground-disturbing activities. If active nests are discovered, this mitigation measure establishes criteria that will require avoidance of the nests until a qualified biologist determines that the nest is no longer active or that the juveniles from the occupied nest have fledged and are capable of surviving independently from the nest.

Mitigation Measure BIO-1: The following measures shall be implemented prior to construction to avoid or minimize impacts to nesting birds:

1. To the extent feasible, vegetation removal and initial ground disturbance shall occur from September 1 through January 31 so that initial ground disturbing work occurs outside of the general nesting bird season.

2. For vegetation removal and ground disturbance within the Proposed Project footprint that is conducted within the general nesting bird season (February 1 through August 31), pre-construction nesting bird surveys shall be conducted within an appropriate radius of vegetation removal or ground disturbance within 14 days of the initiation of these activities to avoid disturbance to active nests, eggs, and/or young.

3. All active nests of native birds found during the survey shall be protected by a no-disturbance buffer until all young from each nest fledge or the nest otherwise becomes inactive. The size of each buffer shall be determined by a qualified biologist dependent upon extant conditions and may require consultation with the CDFW. Buffers are typically a minimum of 50 feet for non-special-status birds and may be larger for special-status or raptor species.

7.2 Sensitive Natural Communities and Land Cover Types

This section addresses the question:

b) Does the Project 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 California Department of Fish and Game or U.S. Fish and Wildlife Service;

No sensitive biological communities were identified within the Project Area. The entirety of the Project Area is comprised of landscaping and non-native annual grasses and forbs and is not considered a sensitive biological community. The Project Area contains no potential wetlands or other waters potentially within the jurisdiction of the Corps under Section 404 of the Clean Water Act or RWQCB under the Porter Cologne Act and Section 401 of the Clean Water Act. No sensitive biological communities exist in the Project Area; therefore, **no impacts** or mitigation are warranted for the proposed project.

7.3 Aquatic Resources

This section analyzes the Project's potential impacts and mitigation for wetlands and other areas presumed or determined to be within the jurisdiction of the Corps or BCDC in reference to the significance threshold outlined in CEQA Appendix G, Part IV (c):

c) Does the Project have the potential to have a substantial adverse effect on state or 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;

The Project Area contains no potential wetlands or other waters potentially within the jurisdiction of the Corps under Section 404 of the Clean Water Act or RWQCB under the Porter Cologne Act and Section 401 of the Clean Water Act. No aquatic resources exist within the Project Area; therefore, **no impacts** or mitigation are warranted for the proposed project.

7.4 Wildlife Corridors and Native Wildlife Nursery Sites

This section analyzes the Project's potential impacts and mitigation for habitat corridors and linkages in reference to the significance threshold outlined in CEQA Appendix G, Part IV (d):

d) Does the Project have the potential to 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;

No wildlife corridors or native wildlife nursery sites exist within the Project Area; therefore, **no impacts** or mitigation are warranted for the proposed project.

7.5 Local Policies and Ordinances

This section analyzes the Project's potential impacts and mitigation based on conflicts with local policies and ordinances in reference to the significance threshold outlined in CEQA Appendix G, Part IV (e):

e) Does the Project have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;

Local plans and policies related to biological resources examined in this analysis are:

- City of Los Angeles Preservation of Protected Trees

City of Los Angeles Preservation of Protected Trees: A total of five protected trees and have been identified as possibly being impacted to accommodate the Project based on review of Project plans (Figure 3, Appendix A) and tree survey data collected during the surveys (Appendix E). Trees expected to be removed are coast live oaks ranging in size from 5.39 inches to 24.30 inches DBH and are 4 multi trunk (Tree #231, #232, #233, #339) and one single trunk (Tree #335), with a total of 51.36 inches. As per the possible tree replacement requirements, for each protected tree that is approved for removal, a minimum of four trees of the same protected *Quercus* genus as the removed tree, each of a minimum 15-gallon container size, shall be planted on the Project site. However, the 15-gallon saplings also should be 1-inch at 1 foot trunk height and replace the value of the removed trees. Therefore, removal of the five protected trees may require tree replacement of a minimum of 20 or 52 native *Quercus* species saplings. The 52 are calculated using the total inches possibly impacted and multiplying by the 1-inch minimum requirement.

Additional trees requiring removal include all non-protected trees listed above. Additional details, including a comprehensive list of trees surveyed and representative photographs are provided in the Tree Report (Appendix E)

Mitigation Measure LOC-1: The following measures shall be implemented in order to avoid or minimize impacts protected trees:

1. A total of 51, 24-inch box sized coast live oaks will be incorporated into the landscaping plan.

7.6 Habitat Conservation Plans

This section analyzes the Project's potential impacts and mitigation based on conflicts with any adopted local, regional, and state habitat conservation plans in reference to the significance threshold outlined in CEQA Appendix G, Part IV (f):

> *f) Does the Project have the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.*

The Project Area does not fall within any local, regional, or state habitat conservation plans; therefore, there are **no impacts** to the function of the Habitat Plan.

8.0 REFERENCES

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APPENDIX A – FIGURES

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Sources: National Geographic, WRA | Prepared By: njander, 4/11/2022

Figure 1. Study Area Regional Location Map

15825 Roxford St.
Commercial Development Project
Los Angeles, California

0 0.25 0.5 Miles

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Sources: USDA NAIP Imagery 2020, WRA | Prepared By: njander, 4/11/2022

Figure 2. Aerial Photograph of Study Area

Commercial Development Project
15825 Roxford St.
Los Angeles, California

0 100 200 US Feet

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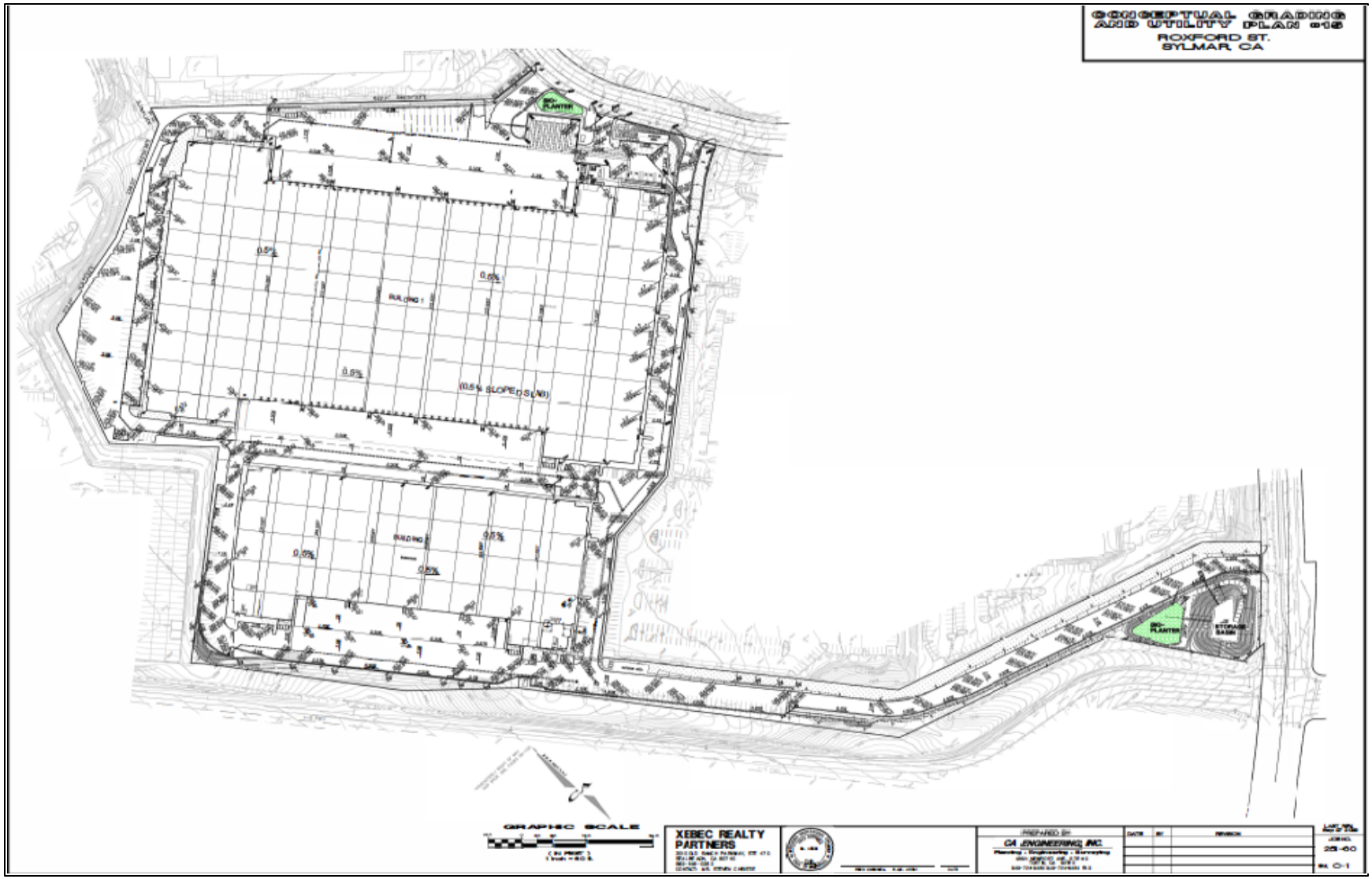

Figure 3a. Site Plan (XEBEC 2022)

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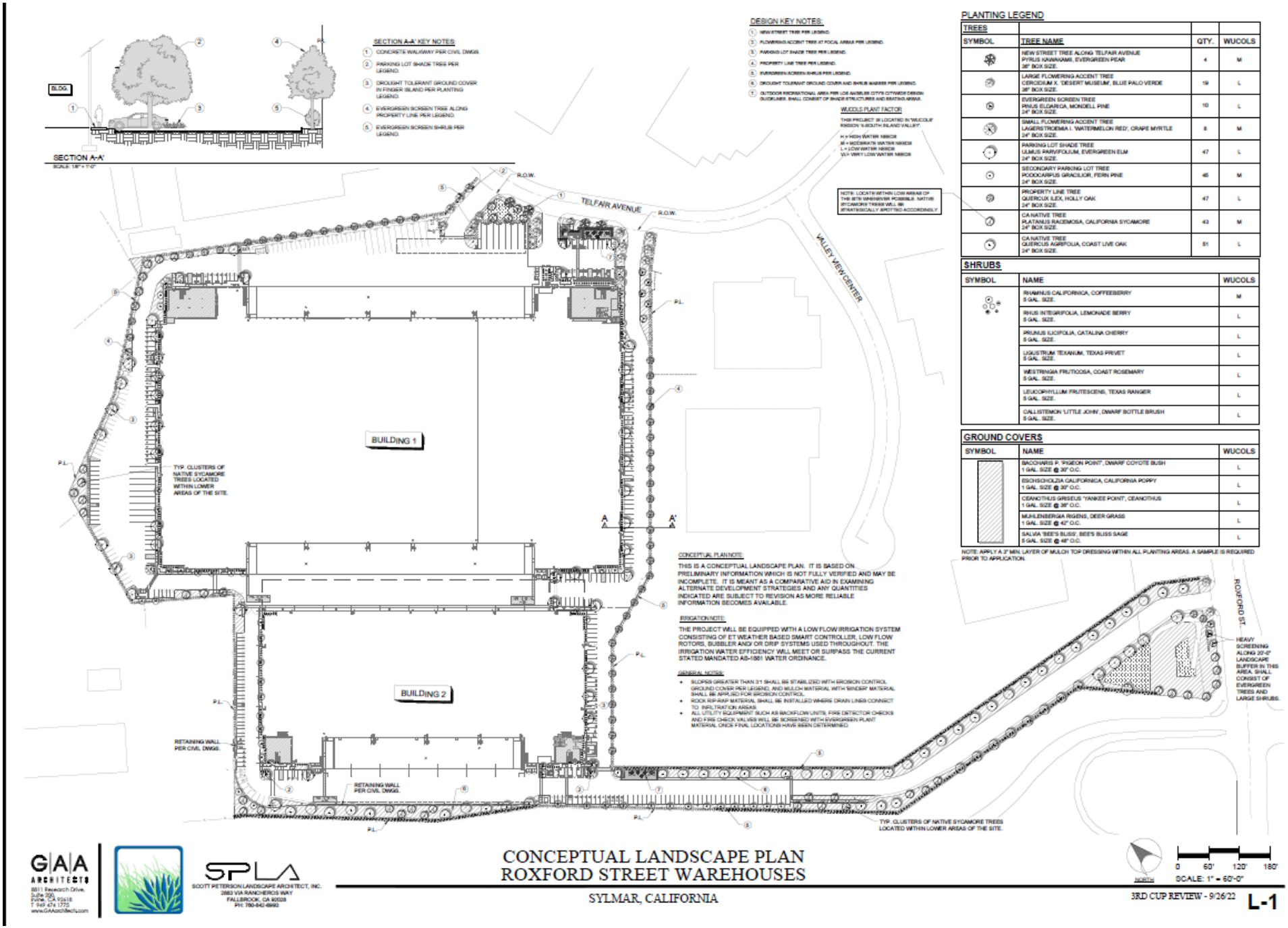

Figure 3b. Landscape Plan (SPLA 2022)

Sources: USDA NAIP Imagery 2020, USDA SURRGO, WRA | Prepared By: njander, 4/11/2022

Figure 4. Soils

15825 Roxford St.
Commercial Development Project
Los Angeles, California

0 100 200 US Feet

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Sources: USDA NAIP Imagery 2020, WRA | Prepared By: njander, 4/11/2022

Figure 5. Biological Communities in the Study Area

15825 Roxford St.
Commercial Development Project
Los Angeles, California

0 100 200 Feet

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APPENDIX B – SPECIES OBSERVED IN AND AROUND THE PROJECT AREA

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Appendix B-1. Plant species observed within Study Area during February 15, 2022, site visit

Scientific Name	Common Name	Origin	Form	Rarity Status	CAL-IPC Status	Wetland Status (AW 2018)
Acacia melanoxylon	Blackwood acacia	non-native (invasive)	tree	-	Limited	-
Artemisia californica	Coastal sage brush	native	shrub	-	-	-
Asclepias fascicularis	Milkweed	native	perennial herb	-	-	FAC
Avena barbata	Slim oat	non-native (invasive)	annual, perennial grass	-	Moderate	-
Baccharis salicifolia ssp. salicifolia	Mule fat	native	shrub	-	-	FAC
Brickellia californica	California brickellia	native	perennial herb	-	-	FACU
Bromus diandrus	Ripgut brome	non-native (invasive)	annual grass	-	Moderate	-
Bromus rubens	Red brome	non-native (invasive)	annual grass	-	High	UPL
Capsella bursa-pastoris	Shepherd's purse	non-native	annual herb	-	-	FACU
Carpobrotus edulis	Iceplant	non-native (invasive)	perennial herb	-	High	-
Centaurea melitensis	Tocalote	non-native (invasive)	annual herb	-	Moderate	-
Chasmanthe floribunda	Chasmanthe	non-native	perennial herb	-	Watch	-
Chenopodium album	Lambs quarters	non-native	annual herb	-	-	FACU
Convolvulus arvensis	Field bindweed	non-native	perennial herb, vine	-	-	-
Cynodon dactylon	Bermuda grass	non-native (invasive)	perennial grass	-	Moderate	FACU
Dimorphotheca sinuata	African daisy	non-native	annual herb	-	-	-
Encelia farinosa	Brittlebush	native	shrub	-	-	-
Erodium cicutarium	Red stemmed filaree	non-native (invasive)	annual herb	-	Limited	-
Erodium moschatum	Whitestem filaree	non-native	annual herb	-	-	-

Scientific Name	Common Name	Origin	Form	Rarity Status	CAL-IPC Status	Wetland Status (AW 2018)
Eucalyptus camaldulensis	Red gum	non-native (invasive)	tree	-	Limited	FAC
Eucalyptus globulus	Blue gum	non-native (invasive)	tree	-	Limited	-
Festuca myuros	Rattail sixweeks grass	non-native (invasive)	annual grass	-	Moderate	FACU
Ficus carica	Common fig	non-native (invasive)	tree	-	Moderate	FACU
Frangula californica	California coffeeberry	native	shrub	-	-	-
Fraxinus velutina	Arizona ash	native	tree	-	-	FAC
Heteromeles arbutifolia	Toyon	native	shrub	-	-	-
Heterotheca grandiflora	Telegraph weed	native	annual, perennial herb	-	-	-
Hirschfeldia incana	Short-podded mustard	non-native (invasive)	perennial herb	-	Moderate	-
Hordeum murinum ssp. leporinum	Farmer's foxtail	non-native (invasive)	annual grass	-	Moderate	FACU
Hypochaeris glabra	Smooth cats ear	non-native (invasive)	annual herb	-	Limited	-
Isocoma menziesii var. menziesii	Menzies' goldenbush	native	shrub	-	-	FAC
Jacaranda mimosifolia	Black poui	non-native	tree	-	-	-
Lactuca serriola	Prickly lettuce	non-native	annual herb	-	-	FACU
Liquidambar styraciflua	Sweetgum	non-native	tree	-	-	FAC
Malacothrix saxatilis var. tenuifolia	Short leaved cliff aster	native	perennial herb	-	-	-
Malosma laurina	Laurel sumac	native	tree, shrub	-	-	-
Malva parviflora	Cheeseweed	non-native	annual herb	-	-	-
Medicago polymorpha	Bur clover	non-native (invasive)	annual herb	-	Limited	FACU
Melaleuca viminalis	-	non-native	tree	-	-	-
Morus alba	Mulberry	non-native	tree	-	-	FACU

Scientific Name	Common Name	Origin	Form	Rarity Status	CAL-IPC Status	Wetland Status (AW 2018)
Nicotiana glauca	Tree tobacco	non-native (invasive)	tree, shrub	-	Moderate	FAC
Olea europaea	Olive	non-native (invasive)	tree, shrub	-	Limited	-
Pennisetum setaceum	Fountaingrass	non-native (invasive)	perennial grass	-	Moderate	-
Pinus halepensis	Aleppo pine	non-native	tree	-	-	-
Plantago lanceolata	Ribwort	non-native (invasive)	perennial herb	-	Limited	FAC
Portulaca oleracea	Common purslane	non-native	annual herb	-	-	FAC
Prunus cerasifera	Cherry plum	non-native (invasive)	tree	-	Limited	-
Pyrus calleryana	Callery pear	non-native	tree	-	Watch	-
Quercus agrifolia	Coast live oak	native	tree	-	-	-
Rhus ovata	Sugar bush	native	shrub	-	-	-
Rosmarinus officinalis	Rosemary	non-native	shrub	-	-	-
Salsola tragus	Russian thistle	non-native (invasive)	annual herb	-	Limited	FACU
Salvia leucophylla	Purple sage	native	shrub	-	-	-
Sambucus nigra ssp. caerulea	Blue elderberry	native	shrub	-	-	FACU
Schinus terebinthifolius	Brazilian pepper tree	non-native (invasive)	tree, shrub	-	Limited	FAC
Schismus barbatus	Old han schismus	non-native (invasive)	annual grass	-	Limited	-
Senecio vulgaris	Common groundsel	non-native	annual herb	-	-	FACU
Sisymbrium altissimum	Tumble mustard	non-native	annual herb	-	-	FACU
Solanum sp.	-	-	-	-	-	-
Sonchus asper ssp. asper	Prickly sow thistle	non-native	annual herb	-	-	FAC
Stipa miliacea var. miliacea	Smilo grass	non-native (invasive)	perennial grass	-	Limited	-

Scientific Name	Common Name	Origin	Form	Rarity Status	CAL-IPC Status	Wetland Status (AW 2018)
Taraxacum officinale	Red seeded dandelion	non-native	perennial herb	-	-	FACU
Trifolium fragiferum	Strawberry clover	non-native	perennial herb	-	-	FAC
Ulmus parvifolia	Siberian elm	non-native	tree	-	-	UPL
Urtica urens	Annual stinging nettle	non-native	annual herb	-	-	-
Washingtonia robusta	Washington fan palm	non-native (invasive)	tree	-	Moderate	FACW

- All species identified using the *Jepson eFlora* [Jepson Flora Project (eds.) 2020]; nomenclature follows *Jepson eFlora* [Jepson Flora Project (eds.) 2022]

[1] **California Native Plant Society. 2020. Inventory of Rare and Endangered Plants (online edition, v9-01 1.5). Sacramento, California. Online at: http://rareplants.cnps.org/; most recently accessed: April 2022**

FE:	Federal Endangered
FT:	Federal Threatened
SE:	State Endangered
ST:	State Threatened
SR:	State Rare
Rank 1A:	Plants presumed extinct in California
Rank 1B:	Plants rare, threatened, or endangered in California and elsewhere
Rank 2:	Plants rare, threatened, or endangered in California, but more common elsewhere
Rank 3:	Plants about which we need more information – a review list
Rank 4:	Plants of limited distribution – a watch list

[2] **California Invasive Plant Council. 2019. California Invasive Plant Inventory Database. California Invasive Plant Council, Berkeley, CA. Online at: http://www.cal-ipc.org/paf/; most recently accessed: September 2019**

High:	Severe ecological impacts; high rates of dispersal and establishment; most are widely distributed ecologically.
Moderate:	Substantial and apparent ecological impacts; moderate-high rates of dispersal, establishment dependent on disturbance; limited-moderate distribution ecologically
Limited:	Minor or not well documented ecological impacts; low-moderate rate of invasiveness; limited distribution ecologically
Assessed:	Assessed by Cal-IPC and determined to not be an existing current threat

[3] **U.S. Army Corps of Engineers. 2020. National Wetland Plant List, version 3.5. Engineer Research and Development Center. Cold Regions Research and Engineering Laboratory, Hanover, NH. Online at: http://wetland-plants.usace.army.mil/; most recently accessed: August 2020.**

OBL:	Almost always found in wetlands
FACW:	Usually found in wetlands
FAC:	Equally found in wetlands and uplands
FACU:	Usually not found in wetlands
UPL:	Almost never found in wetlands
NL:	Not listed, assumed almost never found in wetlands
NI:	No information; not factored during wetland delineation

Appendix B-2. Wildlife species observed within Study Area during February 15, 2022, site visit

Common Name	Scientific Name
Turkey vulture	*Cathartes aura*
Northern flicker	*Colaptes auratus*
Common raven	*Corvus corax*
House finch	*Haemorhous mexicanus*
California towhee	*Melozone crissalis*
Northern mockingbird	*Mimus polyglottos*
Rufous hummingbird	*Selasphorus rufus*

APPENDIX C – REPRESENTATIVE PHOTOGRAPHS OF THE PROJECT AREA

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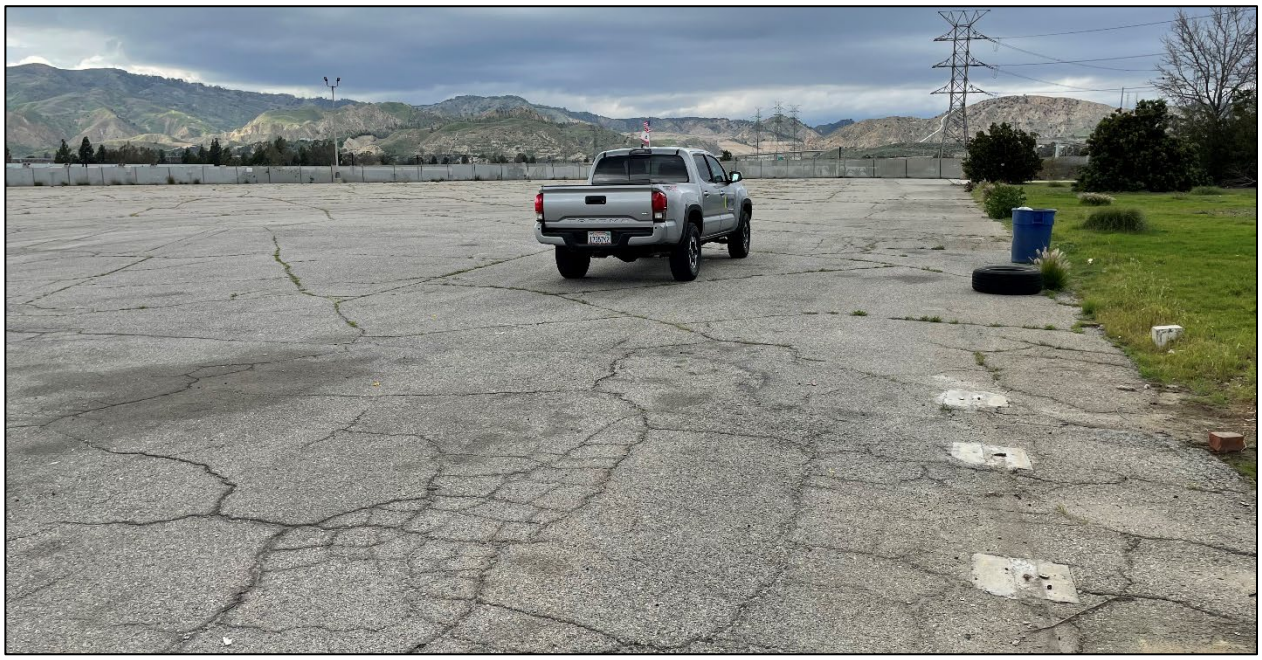
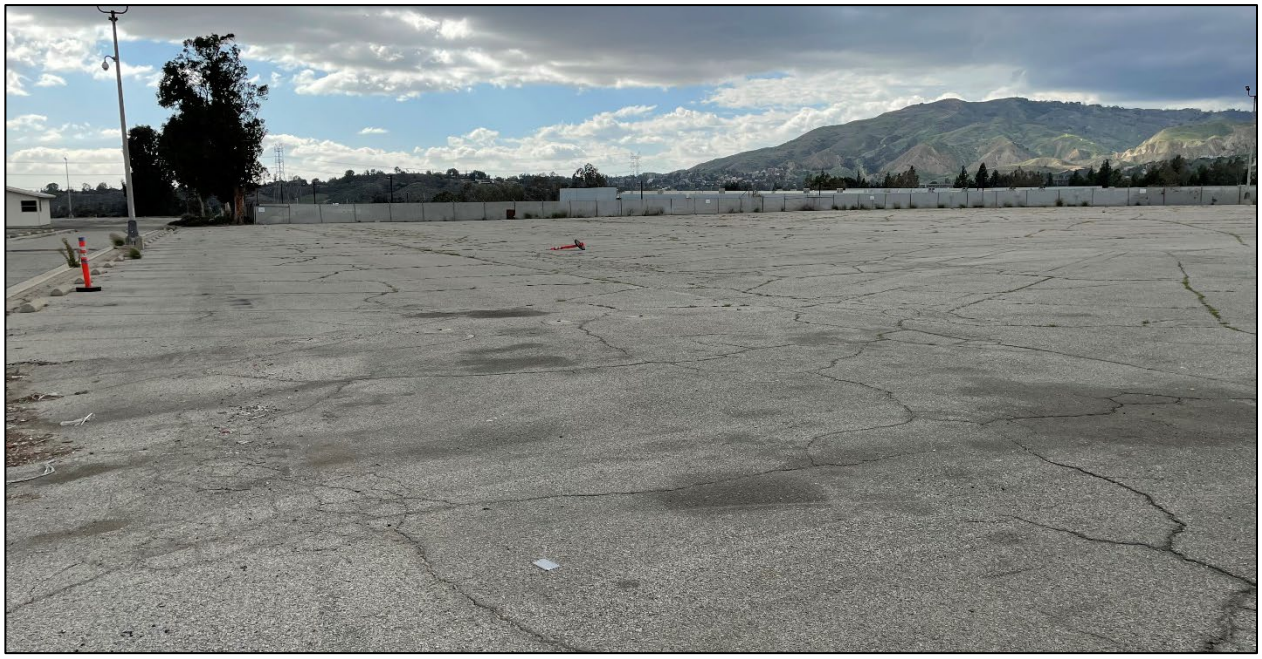


Representative photo of parking lot within the Project Area.



Representative photo of parking lot within the Project Area.

Representative photo of landscaped/ruderal area within the Project Area.

Representative photo of landscaped/ruderal area within the Project Area.

Representative photo of warehouse within the Project Area.

Representative photo of road within the Project Area.

APPENDIX D – SPECIAL-STATUS SPECIES POTENTIAL TABLE

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Species	Status	Habitat Requirements	Potential to Occur in the Project Area	Results and Recommendations
Plants				
Slender mariposa-lily *Calochortus clavatus* var. *gracilis*	CRPR 1B.2 USFS Sensitive	Chaparral, coastal scrub, valley and foothill grassland. Shaded foothill canyons; often on grassy slopes within other habitat. 210-1815 m.	**Unlikely.** Some of the habitat components are present within the Project Area; however, the habitat is of very poor quality.	
Plummer's mariposa-lily *Calochortus plummerae*	CRPR 4.2	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest. Occurs on rocky and sandy sites, usually of granitic or alluvial material. Can be very common after fire. 60-2500 m.	**Unlikely.** Some of the habitat components are present within the Project Area; however, the habitat is of very poor quality.	
California Orcutt grass *Orcuttia californica*	Federal Endangered California Endangered CRPR 1B.1	Vernal pools. 10-660 m.	**No Potential.** Required habitat components are not present within the Project Area.	
Nevin's barberry *Berberis nevinii*	Federal Endangered California Endangered CRPR 1B.1	Chaparral, cismontane woodland, coastal scrub, riparian scrub. On steep, N-facing slopes or in low grade sandy washes. 90-1590 m.	**No Potential.** Required habitat components are not present within the Project Area.	
San Fernando Valley spineflower *Chorizanthe parryi* var. *fernandina*	California Endangered CRPR 1B.1 USFS Sensitive	Coastal scrub, valley and foothill grassland. Sandy soils. 15-1015 m.	**Unlikely.** Some of the habitat components are present within the Project Area; however, the habitat is of very poor quality.	

Species	Status	Habitat Requirements	Potential to Occur in the Project Area	Results and Recommendations
Slender-horned spineflower *Dodecahema leptoceras*	Federal Endangered California Endangered CRPR 1B.1	Chaparral, cismontane woodland, coastal scrub (alluvial fan sage scrub). Flood deposited terraces and washes; associates include Encelia, Dalea, Lepidospartum, etc. Sandy soils. 200-765 m.	**Unlikely.** Some of the habitat components are present within the Project Area; however, the habitat is of very poor quality.	
Palmer's grapplinghook *Harpagonella palmeri*	CRPR 4.2	Chaparral, coastal scrub, valley and foothill grassland. Clay soils; open grassy areas within shrubland. 20-955 m.	**No Potential.** Required habitat components are not present within the Project Area.	
Mesa horkelia *Horkelia cuneata var. puberula*	CRPR 1B.1 USFS Sensitive	Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. 15-1645 m.	**Unlikely.** Some of the habitat components are present within the Project Area; however, the habitat is of very poor quality.	
Robinson's pepper-grass *Lepidium virginicum* var. *robinsonii*	CRPR 4.3	Chaparral, coastal scrub. Dry soils, shrubland. 4-1435 m.	**Unlikely.** Some of the habitat components are present within the Project Area; however, the habitat is of very poor quality.	
Davidson's bush-mallow *Malacothamnus davidsonii*	CRPR 1B.2	Coastal scrub, riparian woodland, chaparral, cismontane woodland. Sandy washes. 150-1525 m.	**Unlikely.** Some of the habitat components are present within the Project Area; however, the habitat is of very poor quality.	
Greata's aster Symphyotrichum greatae	CRPR 1B.3	Chaparral, cismontane woodland, Broad-leafed upland forest, lower montane coniferous forest, riparian woodland. Mesic canyons. 335-2015 m.	**No Potential.** Required habitat components are not present within the Project Area.	

Species	Status	Habitat Requirements	Potential to Occur in the Project Area	Results and Recommendations
Mammals				
Townsend's big-eared bat *Corynorhinus townsendii*	CDFW Species of Special Concern BLM Sensitive USFS Sensitive WBWG High Priority	Associated with a wide variety of habitats from deserts to higher-elevation mixed and coniferous forests. Females form maternity colonies in buildings, caves and mines, and males roost singly or in small groups. Foraging typically occurs at edge habitats	**Unlikely.** Any occurrences on site are likely to be during foraging. No roosting habitat on-site due to the sensitivity of the species to disturbance.	
Hoary bat *Lasiurus cinereus*	WBWG Medium Priority	Prefers open forested habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths.	**Unlikely.** Any occurrences on site are likely to be during foraging. Open forest and woodland roosting habitat is not present on-site.	
Birds				
Swainson's hawk *Buteo swainsoni*	California Threatened BLM Sensitive USFWS Birds of Conservation Concern	Summer resident in California's Central Valley and limited portions of the southern California interior. Nests in tree groves and isolated trees in riparian and agricultural areas, including near buildings. Forages in grasslands and scrub habitats as well	**No Potential.** Grassland and scrub foraging habitat is not present within the Project Area	
Western yellow-billed cuckoo *Coccyzus americanus occidentalis*	Federal Threatened California Endangered BLM Sensitive USFS Sensitive USFWS Birds of Conservation Concern	Summer resident, breeding in dense riparian forests and jungles, typically with early successional vegetation present. Utilizes densely-foliaged deciduous trees and shrubs. Eats mostly caterpillars. Current breeding distribution within California very res	**No Potential.** Riparian forest habitat is not present within the Project Area.	

Species	Status	Habitat Requirements	Potential to Occur in the Project Area	Results and Recommendations
Coastal California gnatcatcher *Polioptila californica californica*	Federal Threatened CDFW Species of Special Concern	Year-round, obligate resident of sage scrub below 2,500 feet in coastal southern California. Favors scrub dominated by California sagebrush (Artemisia).	**No Potential.** Sage scrub habitat is not present within the Project Area.	
Least Bell's vireo *Vireo bellii pusillus*	Federal Endangered California Endangered	Summer resident. Breeds in riparian habitat along perennial or intermittent rivers and creeks; prefers a multi-tiered canopy with dense early successional vegetation in the understory. Willows, mulefat and other understory species are typically used for n	**No Potential.** Riparian habitat is not present within the Project Area.	
Reptiles and Amphibians				
California legless lizard *Anniella spp.*	CDFW Species of Special Concern	coastal sand dunes and sandy washes and alluvial fans	**No Potential.** Sandy dune or wash habitats are not present within the Project Area.	
Coastal whiptail *Aspidoscelis tigris stejnegeri*	CDFW Species of Special Concern	Semiarid habitats with open, sparsely vegetated areas, scrub, chaparral, grassland, and woodlands	**No Potential.** Semiarid sparsely vegetated habitat is not present within the Project Area.	
Coast horned lizard *Phrynosoma blainvillii*	CDFW Species of Special Concern BLM Sensitive	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Prefers friable, rocky, or shallow sandy soils for burial; open areas for sunning; bushes for cover; and an abundant supply of ants and other insec	**No Potential.** Semiarid sparsely vegetated habitat is not present within the Project Area.	
Two-striped gartersnake *Thamnophis hammondii*	CDFW Species of Special Concern BLM Sensitive USFS Sensitive	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 feet elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	**No Potential.** Riparian habitat is not present within the Project Area.	

Species	Status	Habitat Requirements	Potential to Occur in the Project Area	Results and Recommendations
Southern mountain yellow-legged frog *Rana muscosa*	Federal Endangered California Endangered CDFW Watch List USFS Sensitive	Federal listing refers to populations in the San Gabriel, San Jacinto, and San Bernardino Mountains only. Always encountered within a few feet of water. Tadpoles may require up to 2 years to complete their aquatic development.	**No Potential.** Aquatic habitat is not present within the Project Area.	
Western spadefoot *Spea hammondii*	CDFW Species of Special Concern BLM Sensitive	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands. Shallow temporary pools formed by winter rains are essential for breeding and egg-laying.	**Unlikely.** Grassy habitat components are present within the Project Area; however, the habitat is of very poor quality.	
Fish				
Santa Ana sucker *Catostomus santaanae*	Federal Threatened AFS Threatened	Endemic to Los Angeles Basin southern coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water, and algae.	**No Potential.** Aquatic habitat is not present within the Project Area.	
Arroyo chub *Gila orcuttii*	CDFW Species of Special Concern USFS Sensitive AFS Vulnerable	Los Angeles Basin south coastal streams. Slow water stream sections with mud or sand bottoms. Feed heavily on aquatic vegetation and associated invertebrates.	**No Potential.** Aquatic habitat is not present within the Project Area.	
Santa Ana speckled dace *Rhinichthys osculus ssp. 8*	CDFW Species of Special Concern USFS Sensitive AFS Threatened		**No Potential.** Aquatic habitat is not present within the Project Area.	

Species	Status	Habitat Requirements	Potential to Occur in the Project Area	Results and Recommendations
Invertebrates				
Crotch bumble bee *Bombus crotchii*	California Candidate Endangered	Range largely restricted to California, favoring grassland and scrub habitats. Typical of bumble bees, nests are usually constructed underground.	**Unlikely.** Grassy habitat components are present within the Project Area; however, the habitat is of very poor quality.	