

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942
619.462.1515 tel
619.462.0552 fax
www.helixepi.com



January 13, 2020

COP-04

Mr. Eduardo Sida, MPH
Community Service Department
City of Perris
135 N. D Street
Perris, CA 92570

Subject: Biological Resources Letter Report for the Enchanted Hills Park Project

Dear Mr. Sida:

This letter presents the results of a biological resources technical study completed by HELIX Environmental Planning, Inc. (HELIX) for the Enchanted Hills Park Project (project) located in the City of Perris (City), Riverside County, California. The City proposes to create a park, south of Metz Road, in the community of Enchanted Hills.

This letter report is intended to summarize the existing biological resources within the site and provide an analysis of the proposed impacts in accordance with the California Environmental Quality Act (CEQA) and applicable federal, state, and local policy, including consistency with the adopted Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

INTRODUCTION

Project Location

The approximately 22.7-acre study area is located west of the intersection of Interstate 215 and State Route 74 , in Perris, Riverside County, California (Figure 1, *Regional Location*). The study area is located within the U.S. Geological survey (USGS) 7.5-minute Steele Peak quadrangle map in Section 25, Township 4 South, Range 4 West (Figure 2, *USGS Topography*). Specifically, the study area is bound by Metz Road to the north, Watson Road to the south, residential homes that front Altura Drive to the east, and Carter Drive to the west (Figure 3, *Aerial Photograph*). The study area is surrounded by residential development on all sides, and beyond the housing undeveloped land occurs to the north and east.

The study area is located within the Mead Valley Area Plan of the MSHCP but is not within a criteria cell or group. The nearest criteria cell occurs approximately one mile to the north (Figure 4, *MSHCP Criteria Cells*). The area plan subunits each have specific planning species and biological considerations. These items do not apply to the subject study area as it is not within a subunit. The study area occurs on

Assessor's Parcel Numbers (APNs) 326-062-017, 326-071-001, -002, 326-072-002, -003, -004, -005, and 326-073-001; APN 326-072-001 is not a part of the study area.

Project Description

The Enchanted Hills area was recognized as a park-deficient community, and subsequently, the City was awarded funds through California Department of Housing and Community Development to assist in the acquisition of parcels to create a park. Currently, the City is in the process of applying for a Proposition 68 – Statewide Park Development and Community Revitalization Program grant to construct the park. Additionally, the project site is in what the City's General Plan designates as Planning Area 7, which notes that there is a need for active parkland and sports fields for use by residents in this area. Presently the site is zoned as R5 – Mobile Home Subdivision and has a General Plan land use designation of R 6,000 (Single-Family Residential 6,000, square foot lot), which allows for a park.

The proposed project consists of a neighborhood park. Currently the project site is largely undeveloped; however, there are several trails, a BMX course, signs of disturbance, and man-made features. Site topography is relatively flat with a slight downward slope from the north to the south. While many natural features of the site will be retained, park development would include the introduction of hardscape and impermeable surfaces as well as turfing and landscaped areas.

Through a series of community outreach efforts, the City prepared a conceptual plan for the project. The plan includes a combination of passive and active recreational features. The park will include a multi-use field, child play area, toddler play area, restrooms, picnic shelters, hardscape, parking lots, bridges, trails, a basketball court, BMX course improvements, art rocks, a splash pad, a skating area, and a zip line. Additionally, the project would retain and incorporate some of the existing site features, such as Owl Rock, which is a painted boulder, and an existing BMX course that has been built by neighbors. The conceptual plan also identifies a detention basin near the Weston Road project entrance. There are three entrances to the site; one at the intersection of Weston Road and Diana Street, and two entrances that form a horse-shoe drive adjacent to and accessible from Metz Road. One parcel within the larger project area is not included as a part of the project as the City has been unable to acquire it (APN 326-072-001).

METHODS

Pre-Survey Investigation

The study area for this report is based on the proposed park site. The areas outside of the empty lot consists mostly of private property. Where feasible these areas were examined using binoculars. Prior to conducting field surveys, a thorough review of relevant maps, databases, and literature pertaining to biological resources known to occur within the project vicinity was performed. Recent and historical aerial imagery (Google 2019), topographic maps (USGS Steele Peak Quadrangle), soils maps (Natural Resource Conservation Service [NRCS] 2019), and other maps of the study area and vicinity were acquired and reviewed to obtain updated information on the natural environmental setting.

In addition, a query of sensitive species and habitats databases was conducted, including the U.S. Fish and Wildlife Service (USFWS) Critical Habitat Portal (2019a), USFWS species records (USFWS 2019b), California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB; CDFW

2019), and California Native Plant Society (CNPS) Electronic Inventory (California Native Plant Society [CNPS] 2019). The USFWS' National Wetlands Inventory (NWI) was also reviewed (USFWS 2019c). Recorded locations of species, habitat types, wetlands, and other resources were mapped and overlaid onto aerial imagery using Geographic Information Systems (GIS). The MSHCP was also thoroughly reviewed for context and to identify regional conservation goals and objectives for the vicinity of the project site that might conflict with the project.

General Biological Survey

HELIX biologist Laura Moreton performed a general biological survey on November 15, 2019, which included 100 percent visual coverage of the study area and immediate vicinity. The general biological survey included a general inventory of existing conditions and focused primarily on mapping existing vegetation communities or habitat types, mapping potential jurisdictional waters and wetlands, assessing suitability for sensitive plant and animal species, and noting other sensitive biological resources that occur or have the potential to occur. Meandering pedestrian transects were conducted throughout the site in order to obtain 100 percent visual coverage. Physical parameters assessed included vegetation and soil conditions, presence of indicator plant and animal species, slope, aspect, and hydrology.

Vegetation was mapped on 1"=100' scale aerial imagery. Vegetation community classifications follow Holland (1986) with additional classification assistance from the online Manual of California Vegetation (CNPS 2019). Plant species observed or otherwise detected during biological surveys of the study area are included in Attachment A. Animal species observed or detected are included in Attachment B. Sensitive species recorded within three miles of the site were analyzed for potential to occur (Attachment C; status codes in Attachment D). A complete list was compiled and recorded, and locations were mapped and overlaid onto aerial imagery using GIS. Plant identifications were made in the field. Directed inspections of habitat were performed to locate target rare plant species known to occur on the site and/or in the region. Animal species were identified by direct observation, vocalizations, or the observance of scat, tracks, or other signs. Representative photographs of the site were taken and are included in Attachment E.

Burrowing Owl Habitat Assessment

Ms. Moreton conducted a burrowing owl (*Athene cunicularia*) habitat assessment in accordance with the required protocol, on November 15, 2019 (County 2006). The habitat assessment covered the entire property. Burrows with a diameter of at least three inches and with potential to support burrowing owls were mapped (Figure 7, *Vegetation and Sensitive Species*). In addition, a 500-foot buffer zone was surveyed on foot, where accessible, with private property surveyed visually using binoculars from the edge of the subject property, where owl habitat directly bordered the property.

Survey Limitations

The lists of species identified are not necessarily comprehensive accounts of all species that occur on the site, as species that are nocturnal, secretive, or seasonally restricted may not have been observed.

Nomenclature

Nomenclature used in this report follows The Jepson Manual for plants (Baldwin et al. 2012), Taggart (2012) for reptiles, American Ornithological Society (2019) for birds, and Bradley et al. (2014) for mammals.

RESULTS

Existing Conditions

General Land Use

General land uses within the study area include vacant land, residential housing, and roads. The proposed location of the park is on vacant land. The site is bounded by Metz Road to the north, Watson Road to the south, residential homes that front Altura Drive to the east, and residences along Carter Drive to the west. Beyond the residential housing there is vacant land to the north and east of the project site. The Motte/Rimrock Reserve, which is classified as Public/Quasi-public (PQP) Conserved land owned by the University of California, is located approximately 200 feet north of the project site.

Disturbance

The study area is extremely disturbed. There are several trails and dirt paths that run through the site, some of which are wide enough to be used by cars, and tire tracks indicate that they are in fact used by vehicles. Multiple individuals were observed walking through the site and one of these people was walking dogs, off the leash. In addition, BMX bike jumps have been built in the western portion of the site. The site is frequently used for dumping, and numerous large items, such as mattresses, were observed throughout the site. Other trash items included food wrappers, toys, clothes, tires, oil containers, and furniture, among many other things. Vegetation is generally dominated by non-native and/or invasive plants throughout the site.

Topography and Soils

Elevations within the study area range from approximately 1,690 feet (515 meters) above mean sea level (AMSL) to 1,730 feet (527 meters) AMSL. The site is generally flat with undulating topography, and several rock outcrops are located throughout the study area. Two soil types, as mapped by NRCS (2019), occur within the survey area (Figure 6, *Soils*): Cieneba rocky sandy loam, 8 to 15 percent slopes, eroded and Hanford coarse sandy loam, 2 to 8 percent slopes.

Vegetation Communities/Habitat Types

Vegetation communities or land uses are classified in this report according to Holland (1986). Six vegetation communities or land use types were mapped within the study area: mule fat scrub, flat-topped buckwheat (disturbed), non-native grassland, tamarisk scrub, disturbed, and developed (Figure 7; Table 1, *Vegetation Communities and Land Uses*). A brief description of each community is provided below.

Table 1
VEGETATION COMMUNITIES AND LAND USES

Vegetation Community	Existing Acreage*
Upland	
Flat-topped buckwheat (disturbed)	1.7
Non-native grassland	2.8
Disturbed	16.0
Developed	<0.1
Subtotal	20.6
Wetland/Riparian	
Mule fat scrub	1.44
Tamarisk scrub	0.67
Subtotal	2.11
TOTAL	22.71

*Upland habitats are rounded to the nearest 0.1 acre and wetland/riparian habitats are rounded to the nearest 0.01 acre. Total reflects rounding.

Flat-topped Buckwheat (disturbed)

Flat-topped buckwheat (*Eriogonum fasciculatum*) is a monocultural community usually occurring due to disturbance and transitioning to coastal sage scrub or chaparral. It is often found in disturbed areas, as is the case at this site. One additional characteristic species is deerweed (*Acmispon glaber*). The study area supports 1.7 acres of this vegetation community, which occurs predominately within the northern portion of the site (Figure 7). This habitat type is entirely disturbed on the site. The only areas where it is present are surrounding and adjacent to large boulders and rocks where vehicular access is difficult, and/or limited, allowing this vegetation to remain. Species present include flat-topped buckwheat interspersed with non-native grasses and forbs, making it the disturbed form of the habitat type.

Non-native Grassland

Non-native grassland is composed of a dense to sparse cover of annual grasses and is often associated with numerous species of showy-flowered native annual forbs. This association occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species include oat (*Avena* spp.), red brome (*Bromus rubens*), ripgut grass (*B. diandrus*), ryegrass (*Lolium* sp.), and mustard (*Brassica* sp.). Most of the annual introduced species, that comprise the majority of species and biomass within non-native grassland, originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California. These two factors, in addition to intensive grazing and agricultural practices in conjunction with severe droughts, contributed to the successful invasion and establishment of these species and the replacement of native grasslands with annual dominated non-native grassland (Jackson 1985). The study area supports 2.8 acres of this vegetation community at the center of the site (Figure 7). Species present include oats, red brome, and ripgut grass.

Disturbed

Disturbed habitat includes unvegetated or sparsely vegetated areas, particularly where the soil has been heavily compacted by prior development or where agricultural lands have been abandoned. Disturbed

habitat is generally dominated by non-native weedy species that adapt to frequent disturbance or consists of dirt trails and roads. The study area supports 16.0 acres of this vegetation community (Figure 7). A portion of the disturbed habitat has been used to build bike jumps for the community. There are also roads crossing most of the site, and countless dump sites and trash across the site. Disturbed habitat dominates the site, and is either unvegetated or dominated by disturbance-tolerant non-native species including short-pod mustard (*Hirschfeldia incana*), wild lettuce (*Lactuca serriola*), Russian thistle (*Salsola tragus*), Mediterranean grass (*Schismus barbatus*), and red brome. Native species present included dove weed (*Croton setigerus*) and paniculate tarplant (*Deinandra paniculata*).

Developed

Developed land is where permanent structures and/or pavement have been placed, which prevents the growth of vegetation, or where landscaping is clearly tended and maintained. Developed land in the study area consists of a section of pavement in the southeast corner of the project site. The study area includes less than 0.1 acre of developed land.

Mule Fat Scrub

Mule fat scrub consists of a depauperate, tall, herbaceous riparian scrub strongly dominated by mule fat (*Baccharis salicifolia*). It is maintained by frequent flooding. Most stands succeed to cottonwood-or sycamore-dominated riparian forests or woodlands. It is also associated with willows (*Salix* spp.) and nettle (*Urtica holosericea*). It is usually present below 2,000 feet in elevation (Holland 1986). The study area supports 1.44 acres of this vegetation community in the southwest portion of the site (Figure 7). There appear to have been mature willows at the site at one time, which were killed by drought or fire, as indicated by the presence of large, dead tree trunks. Some of these are re-sprouting; however, they are small in stature and the area is generally dominated by mule fat with an understory of non-native grasses. Species present included mule fat, willows, and giant wild rye (*Elymus condensatus*).

Tamarisk Scrub

Tamarisk scrub is typically composed of shrubs and/or small trees of exotic tamarisk species but may also contain willows, salt bushes (*Atriplex* spp.), catclaw acacia (*Acacia greggii*), and salt grass (*Distichlis spicata*). This habitat occurs along intermittent streams in areas where high evaporation rates increase the salinity level of the soil. Tamarisk is a phreatophyte, which is a plant that can obtain water from an underground water table. The study area supports 0.67 acre of this vegetation community. Tamarisk scrub occurs in the southeast corner of the project site (Figure 7). Species present include tamarisk and Mexican fan palm (*Washingtonia robusta*) with an understory of non-native grasses.

General Fauna

The study area is generally disturbed and does not provide extensive high-quality habitat for animal species, although many species commonly known to tolerate disturbance were observed, including coyotes (*Canis latrans*; scat) and California ground squirrels (*Otospermophilus beecheyi*). Other species observed or otherwise detected within the study area included common bird species such as house finch (*Haemorhous mexicanus*), American crow (*Corvus brachyrhynchos*), and mourning dove (*Zenaidura macroura*). A full list of animal species observed within the study area is included in Attachment B.

Sensitive Biological Resources

Sensitive Natural Communities

Sensitive natural communities include land that supports unique vegetation communities or the habitats of rare or endangered species or subspecies of animals or plants as defined by Section 15380 of the CEQA Guidelines.

The study area supports the following sensitive natural communities: mule fat scrub, flat-topped buckwheat (disturbed), non-native grassland, and tamarisk scrub.

Special-Status Plant Species

Special-status plant species are those listed as federally threatened or endangered by the USFWS; State listed as threatened or endangered or considered sensitive by the CDFW; and/or are CNPS California Rare Plant Rank (CRPR) List 1A, 1B, or 2 species, as recognized in the CNPS' Inventory of Rare and Endangered Vascular Plants of California and consistent with the CEQA Guidelines. Special-status plant species also include those identified in the MSHCP. A complete list of special-status plants known to occur in the area or listed for this area by the MSHCP, along with their potential to occur within the study area, is included as Attachment C.

Six special-status plant species are known to occur within three miles of the project site, three of which are listed at the federal and/or state level. None of the federally or state listed species are expected to occur on the site. The project is not located within an MSHCP Narrow Endemic Plant Species Survey Area (NEPSSA).

Paniculate tarplant was the only sensitive species observed during the general biology survey conducted on November 15, 2019. Except for paniculate tarplant, no rare plant species have potential to occur within the project impact footprint due to the lack of appropriate habitat and/or soils (Attachment C). A brief description of paniculate tarplant, the only sensitive plant species observed within the study area, during the general biological survey is provided below.

Paniculate tarplant (*Deinandra paniculata*)

Listing: --/--; CRPR List 4.2

Distribution: San Diego, Orange, Riverside, Los Angeles, Santa Barbra, and San Luis Obispo counties below approximately 4,330 feet in elevation

Habitat: Valley grassland

Status within the study area: Approximately 2,000 individuals of paniculate tarplant were observed within the study area, with the large majority occurring within the southern portion of the project site, toward the center of the site within disturbed habitat and non-native grassland.

Special-Status Animal Species

Special-status animal species are those listed as threatened or endangered, proposed for listing, or candidates for listing by the USFWS and considered sensitive animals by the CDFW. Special-status animal species also include those identified in the MSHCP. Special-status animal species with potential to occur in the study area are included in Attachment C.

Fourteen listed or sensitive animal species are known to occur within three miles of the project site, 14 of which are listed at the federal and/or state level. Three listed species are not expected to occur within the study area: western pond turtle (*Clemmys marmorata pallida*), southern grasshopper mouse (*Onychomys torridus ramona*), and coastal California gnatcatcher (*Polioptila californica californica*). Four listed species have low potential to occur within the study area: California glossy snake (*Arizona elegans occidentalis*), burrowing owl (*Athene cunicularia*), crotch bumblebee (*Bombus crotchii*), and western spadefoot (*Scaphiopus hammondi*). Six listed species have moderate potential to occur within the study area: southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), orange-throated whiptail (*Cnemidophorus hyperthrus*), coastal western whiptail (*Cnemidophorus tigris stenjnegeri*), red-diamond rattlesnake (*Crotalus ruber*), Stephen's kangaroo rat (*Dipodomys stephensi*), and coast horned lizard (*Phrynosoma coronatum blainvillei*).

Prior to construction, protocol burrowing owl surveys will be completed to determine whether the site is occupied by the burrowing owl, although no owls or signs were observed during the habitat assessment. The on-site population of ground squirrels was small, with only five potential burrows observed within the study area. Most of the burrows were observed in rocky areas with limited lines of sight that would discourage burrowing owls, and most of the open areas of the site are either subject to human disturbance and trash, or thick non-native grasses, both of which would discourage burrowing owl usage. Based on the size and quality of the site and the known home ranges of burrowing owls, a minimum of 280 acres, it is estimated that the project site by itself could sustain less than one pair of burrowing owls (CDFW 2012).

There was one special-status animal species observed within the study area: Cooper's hawk (*Accipiter cooperii*), a CDFW Watch List species; Figure 7). A brief description of the sensitive animal species observed during the general biological survey is provided below. An explanation of status codes can be found in Attachment D.

Cooper's hawk (*Accipiter cooperii*)

Status: --/WL

Distribution: The Cooper's hawk is widely distributed throughout the MSHCP Plan Area within suitable habitat. It occurs within all Bioregions of the Plan Area.

Habitat(s): Oak groves, mature riparian woodlands, and eucalyptus stands or other mature forests.

Status within the study area: Observed enjoying a meal in a tree on the north side of the project site.

Nesting Birds and Raptors

The study area contains suitable nesting habitat (e.g., trees, shrubs) for several common bird species, including raptors, protected under the Migratory Bird Treaty Act (MBTA) and CFG Code.

Jurisdictional Waters and Wetlands

In the context of this assessment, jurisdictional waters and wetlands include waters of the U.S. regulated by the USACE pursuant to CWA Section 404; waters of the State regulated by the RWQCB pursuant to Section 401 of the CWA and State Porter-Cologne Water Quality Control Act; and/or streambed and riparian habitat regulated by the CDFW pursuant to Sections 1600 *et seq.* of CFG Code.

For the purpose of this report any habitat type generally associated with wetlands has been mapped as a potentially jurisdictional area (Figure 8, *Potentially Jurisdictional Areas*; Table 2, *Potentially Jurisdictional Wetlands*). Wetlands, potentially under the jurisdiction of USACE, RWQCB, CDFW, and/or Riparian/Riverine Areas under the MSHCP, within the study area are associated with an unnamed drainage in the southeastern portion of the project site. No project activities are planned in these areas (Figure 9, *Impacts*).

Table 2
POTENTIALLY JURISDICTIONAL WETLANDS

Jurisdictional Resource	Existing (acres) †
Mule fat scrub	1.44
Tamarisk scrub	0.67
TOTAL	2.11

†Acreage rounded to the nearest hundredth.

Wildlife Corridors and Linkages

Important corridors and linkages have been identified on a local and regional scale throughout the MSHCP planning area. The study area is isolated, surrounded by residential development and surface streets, and is not located within a designated core or linkage. Therefore, it does not currently provide a wildlife corridor or linkage to the surrounding area. Secondly, as the proposed development is a park, it will continue to provide open space for urban wildlife, of similar quality as is provided in its current state. In summary, although the site does not provide a corridor or linkage, it will continue to provide an island of marginal habitat as a park.

APPLICABLE REGULATIONS

Based on the findings of this report, activities affecting the biological resources determined to exist or having the potential to exist within the study area could be subject to the federal, state, and local regulations discussed below.

Federal

Federal Endangered Species Act

Administered by the USFWS, the federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species that are identified as being endangered or threatened with extinction. Actions that jeopardize such species and their habitats are considered a “take” under the federal ESA.

Sections 7 and 10(a) of the federal ESA regulate actions that could harm or harass endangered or threatened species. Section 10(a) allows issuance of permits for “incidental” take of endangered or threatened species. The term “incidental” applies if the taking of the listed species is secondary to, and not the purpose of, an otherwise lawful activity. A conservation plan demonstrating how the take would be minimized and what steps taken would ensure the listed species’ survival must be submitted for the

issuance of Section 10(a) permits. Section 7 describes a process of federal interagency consultation for use when federal actions may adversely affect listed species. A biological assessment is required for any major activity if it may affect listed species. The MSHCP was prepared pursuant to Section 10(a) of the ESA and the Permittees were issued an umbrella Section 10(a) Incidental Take Permit (ITP) from the USFWS authorizing take of multiple federally listed species.

Migratory Bird Treaty Act

All migratory bird species that are native to the United States or its territories are protected under the federal MBTA as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required. In common practice, USFWS places restrictions on disturbances allowed near active raptor nests.

Clean Water Act

Federal wetland regulation (non-marine issues) is guided by the Rivers and Harbors Act of 1899 and the CWA. The Rivers and Harbors Act deals primarily with discharges into navigable waters, while the purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the U.S. Permitting for projects filling waters of the U.S. (including wetlands and vernal pools) is overseen by the USACE under Section 404 of the CWA. Projects may be permitted on an individual basis or may be covered under one of several approved Nationwide Permits. Individual Permits are assessed individually based on the type of action, amount of fill, etc. A CWA Section 401 Water Quality Certification, which is administered by the RWQCB, must be issued prior to any 404 permit. Impacts to waters of the U.S. would result in a need for both a USACE 404 permit and a RWQCB 401 certification.

State

California Endangered Species Act

The California Endangered Species Act (CESA) declares that deserving plant or animal species will be given protection by the state because they are of ecological, educational, historical, recreational, aesthetic, economic, and scientific value to the people of the state. The CESA establishes that it is state policy to conserve, protect, restore, and enhance endangered species and their habitats. Under state law, plant and animal species may be formally designated as rare, threatened, or endangered through official listing by the California Fish and Game Commission. Listed species are given greater attention during the land use planning process by local governments, public agencies, and landowners than are species that have not been listed.

The CESA allows the take of listed endangered, threatened, or candidate species pursuant to a federally-issued Incidental Take Statement (ITS) under Section 7 of the FESA or ITP under Section 10 of the FESA, if the CDFW certifies that the ITS or ITP is consistent with CESA (Fish and Game Code Section 2080.1(a)). Section 2081(b) and (c) of the CESA allows CDFW to issue an ITP for a state-listed threatened and endangered species only if specific criteria are met. These criteria can be found in Title 14 CCR, Sections 783.4(a) and (b). No Section 2081(b) permit may authorize the take of “fully protected” species and “specified birds.” If a project is planned in an area where a fully protected species or specified bird occurs, an applicant must design the project to avoid all take; the CDFW cannot provide take

authorization under CESA. On private property, endangered plants may also be protected by the Native Plant Protection Act (NPPA) of 1977. In addition, CEQA requires disclosure of any potential impacts on listed species and alternatives or mitigation that would reduce those impacts. The MSHCP was prepared pursuant to Section 2081 of the CESA and the Permittees were issued an umbrella Section 2081 ITP from the CDFW authorizing take of multiple state listed species.

California Fish and Game Code Section 1600

The CFG Code provides specific protection and listing for several types of biological resources. Section 1600 of CFG Code requires a Streambed Alteration Agreement (SAA) for any activity that would alter the flow, change, or use any material from the bed, channel, or bank of any perennial, intermittent, or ephemeral river, stream, and/or lake. Typical activities that require an SAA include excavation or fill placed within a channel, vegetation clearing, structures for diversion of water, installation of culverts and bridge supports, cofferdams for construction dewatering, and bank reinforcement. Notification is required prior to any such activities.

California Fish and Game Code Sections 3503, 3503.5, and 3800

These sections of the CFG Code prohibit the take or possession of birds, their nests, or eggs. Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a take. Such a take would also violate federal law protecting migratory birds. ITPs are required from the CDFW for projects that may result in the incidental take of species listed by the state as endangered, threatened, or candidate species. The wildlife agencies require that impacts to protected species be minimized to the extent possible and mitigated to a less-than-significant level.

California Natural Community Conservation Planning Act of 1991

The NCCP Act is designed to conserve habitat-based natural communities at the ecosystem scale while accommodating compatible land uses in coordination with CESA. The CDFW is the principal state agency implementing the NCCP Program. The Act established a process to allow for comprehensive, long-term, regional, multi-species, and habitat-based planning in a manner that satisfies the requirements of the state and federal ESAs (through a companion regional habitat conservation plan). The NCCP program has provided the framework for innovative efforts by the state, local governments, and private interests, to plan for the protection of regional biodiversity and the ecosystems upon which they depend. NCCPs seek to ensure the long-term conservation of multiple species, while allowing for compatible and appropriate economic activity to proceed. The MSHCP was prepared pursuant to the NCCP Act.

Porter-Cologne Water Quality Control Act

The State Water Resources Control Board (SWRCB) and the RWQCB regulate the discharge of waste to waters of the State via the 1969 Porter-Cologne Water Quality Control Act as described in the California Water Code. The California Water Code is the State's version of the federal CWA. Waste, according to the California Water Code, includes sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for purposes of, disposal.

State waters that are not federal waters may be regulated under the Porter-Cologne Water Quality Control Act. A Report of Waste Discharge must be filed with the RWQCB for projects that result in discharge of waste into waters of the State. The RWQCB will issue Waste Discharge Requirements (WDRs) or a waiver. The WDRs are the Porter-Cologne Water Quality Control Act version of a CWA Section 401 Water Quality Certification.

Local

Multiple Species Habitat Conservation Plan

The MSHCP is a comprehensive multi-jurisdictional effort that includes Riverside County and multiple cities in western Riverside County, including the City. Rather than address sensitive species on an individual basis, the MSHCP focuses on the conservation of 146 species, proposing a reserve system of approximately 500,000 acres and a mechanism to fund and implement the reserve system (Dudek and Associates 2003). Most importantly, the MSHCP allows participating entities to issue take permits for listed species so that individual applicants need not seek their own permits from the USFWS and/or CDFW. The MSHCP was adopted on June 17, 2003, by the Riverside County Board of Supervisors. The ITP was issued by both the USFWS and CDFW on June 22, 2004.

SIGNIFICANCE OF PROJECT IMPACTS AND PROPOSED MITIGATION

This section provides a project-level biological resources impact analysis for the proposed project in support of environmental review. The issues addressed in this section are derived from Appendix G of the CEQA Guidelines. Mitigation, monitoring, and reporting requirements to eliminate or reduce project impacts to a less-than-significant level are also provided in this section. Figure 9 depicts the project impacts to vegetation communities and sensitive resources.

ISSUE 1: Special-Status Species

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Issue 1 Impact Analysis

Less than Significant with Mitigation. Paniculate tarplant, a CRPR List 4.2 species, is the only special status plant species observed within the project impact area or determined to have a high potential to occur. The study area supports approximately 2,000 individuals of paniculate tarplant, of which 1,750 (approximately 88 percent) would be impacted by project construction. The 1,750 paniculate tarplant to be impacted are isolated from surrounding populations, and therefore offer no long-term conservation value. Additionally, this species is locally abundant within the County of Riverside, including a population north of the project area within the PQP, which will be preserved (Calflora 2019). The proposed paniculate tarplant impacts cannot be avoided because the tarplant occurs across much of the site and total avoidance of paniculate tarplant in addition to the on-site riparian area would mean the project could not be completed. Paniculate tarplant is locally abundant in Riverside County; therefore, the impacts are not considered a threat to the continued existence of the species and are considered less

than significant. Therefore, no mitigation is proposed for impacts to paniculate tarplant from the proposed project.

One special status wildlife species, Cooper's hawk, was observed in the project impact area and could use the impact area. Cooper's hawk is a covered species under the MSHCP. Additional species listed in Attachment C have low or moderate potential to occur within the study area. However, the project has been designed to impact non-sensitive habitats, while preserving higher quality habitat. The PQP land 200 feet north of the study area provide ample higher quality habitat for the special status wildlife species with potential to use the impact area. Therefore, the project would not have a substantial adverse effect on special status species.

If certain avoidance measures were not incorporated during construction, the project could have an adverse effect on nesting birds protected by the MBTA and CFG Code, as discussed below.

Nesting Birds

The study area contains some trees, shrubs, and other vegetation that provide potential nesting habitat for common birds, including birds and raptors protected under the MBTA and CFG Code. Construction of the proposed project could occur during the general bird nesting season (January 15 through September 15) and, therefore, could result in impacts to nesting birds and violation of the MBTA and CFG Code. Direct impacts could occur as a result of removal of vegetation or soil supporting an active nest. Indirect impacts could occur as a result of construction noise impacting nearby trees or rocky beach areas, if they supported an active nest. Impacts would be considered significant if construction occurred within 300 feet of an active passerine nest or within 500 feet of an active raptor nest. Implementation of mitigation measure BIO-1 below would reduce potentially significant impacts on nesting birds and raptors to less-than-significant levels. In addition, the study area supports potential burrowing owl habitat, and therefore a pre-construction survey is required in order to avoid impacts on burrowing owls, as detailed in mitigation measure BIO-2 below.

Issue 1 Mitigation Measures

BIO-1 Nesting Bird and Raptor Avoidance. If initial grading and vegetation removal activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird breeding season for migratory birds and raptors (January 15 through September 15), the project applicant shall retain a qualified biologist to perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and CFG Code. The pre-construction survey shall be performed no more than seven days prior to the commencement of the activities. If the qualified biologist determines that no active migratory bird or raptor nests occur within 300 feet of the impact site (500 feet for raptors), the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no impacts shall occur within the 300 to 500 foot avoidance buffer which will be established based on the species observed to be nesting, until the young have fledged the nest and the nest is confirmed to no longer be active, or until noise barriers have been installed that adequately protect the nest, as determined by the qualified biologist.

BIO-2 Burrowing Owl Pre-construction Survey. A pre-construction burrowing owl survey shall be conducted. The burrowing owl pre-construction survey shall be conducted in accordance with the protocol described in the Burrowing Owl Survey Instruction for the Western Riverside Multiple Species Habitat Conservation Plan Area (County 2006). The initial take avoidance survey shall occur within 30 days prior to initiating ground disturbing activities. The project shall avoid disturbing active burrowing owl burrows (active nests), and a buffer shall be established between construction activities and occupied burrows, at the discretion of the biologist. If an adequate avoidance buffer cannot be provided between an occupied burrow and required ground-disturbing activities, then passive relocation activities during the non-breeding season (September 1 through February 29) may be authorized in consultation with CDFW, which would include preparation, approval, and implementation of a Burrowing Owl Exclusion Plan in accordance with protocol described in the CDFW Staff Report on Burrowing Owl Mitigation. No impacts shall occur to active burrowing owl nests.

ISSUE 2: Sensitive Natural Communities

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS?

Issue 2 Impact Analysis

Less than Significant with Mitigation. Temporary and permanent impacts would occur within two sensitive habitats: flat-topped buckwheat (disturbed) and non-native grassland (Table 3, *Impacts to Vegetation Communities*; Figure 9). There would be no direct impacts to sensitive riparian habitat.

**Table 3
IMPACTS TO VEGETATION COMMUNITIES**

Vegetation Community	Existing Acreage ¹	Permanent Impact ²
Upland		
Flat-topped buckwheat (disturbed)	1.7	0.7
Non-native grassland	2.8	1.8
Disturbed	16.1	7.0
Developed	<0.1	0.0
Subtotal	20.7	9.5
Wetland/Riparian		
Mule fat scrub	1.44	0.00
Tamarisk scrub	0.67	0.00
Subtotal	2.11	0.00
TOTAL	22.81	9.5

¹Upland habitats are rounded to the nearest 0.1 acre and wetland/riparian habitats are rounded to the nearest 0.01 acre. Total reflects rounding.

²Additional temporary impacts to upland habitat may result due to grading, access, and staging during construction.

The temporary impact area consists of the temporary construction area, which would be used for construction access and stockpiling during construction. The permanent impact area consists of the park

and associated infrastructure such as parking lots, restrooms, and play equipment. There would be no impacts to potential wetlands as the project has been designed to avoid these areas. The impact footprint shown on Figure 9 includes the minor grading and laydown areas required for construction; thus, there would be no additional impacts beyond the footprint shown. Impacts to flat-topped buckwheat (disturbed) and non-native grassland are covered by the MSHCP and no mitigation is required for those habitats because the project site is located outside of a Criteria Cell.

Potential significant indirect impacts could occur if storm water runoff is not controlled at the construction site, and sediment, toxics, and/or other material are inadvertently carried into sensitive habitat within the mule fat scrub or tamarisk scrub east of the impact area. Further, if the construction work areas are not properly fenced, inadvertent encroachment into adjacent sensitive riparian habitat could occur. Compliance with existing regulations for water quality, storm water management, and implementation of mitigation measure BIO-3 below would reduce potentially significant impacts on sensitive natural communities to less-than-significant levels.

Issue 2 Mitigation Measures

BIO-3 Construction Fencing. Temporary construction fencing (with silt barriers as needed according to the stormwater pollution prevention plan [SWPPP]) shall be installed at the limits of project impacts (including construction staging areas and access routes) adjacent to sensitive habitat to prevent sensitive habitat impacts and to prevent the spread of silt from the construction zone into adjacent habitats. Temporary fencing shall be located on the eastern boundary of the impact area west of the mule fat and tamarisk scrub (Figure 7). Fencing shall be installed in a manner that does not impact habitats to be avoided.

Construction crews shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint. Equipment maintenance, staging, and dispensing of fuel, oil, coolant, or other such activities shall occur in designated areas within the fenced project impact limits. These designated areas shall be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent runoff from entering adjacent habitat and shall be shown on the construction plans. Contractor equipment shall be checked for leaks prior to operation and repair, as necessary. "No-fueling zones" shall be designated on construction plans.

If work occurs beyond the fenced or demarcated limits of impact, work shall cease until the problem has been remedied to the satisfaction of the City. Impacts that occur to sensitive riparian areas beyond the approved fence shall be mitigated as determined by the City in coordination with the USFWS, USACE, RWQCB, and/or CDFW. Temporary construction fencing shall be removed upon project completion.

ISSUE 3: Wetlands

Would the project have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means?

Issue 3 Impact Analysis

No significant Impact. The proposed project is designed to avoid all potentially jurisdictional wetlands within the study area.

Issue 3 Mitigation Measures

Implementation of mitigation measure BIO-3 would reduce potential indirect impacts to potential wetlands to less than significant.

ISSUE 4: Wildlife Movement and Nursery Sites

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites?

Issue 4 Impact Analysis

Less than Significant. The project site encompasses undeveloped land within the Mead Valley Area Plan of the MSHCP. The project site is currently surrounded by residential development and roads. Though the project site may provide movement through the neighborhood for wildlife adapted to urban environments, this will not change with the planned development. The park will be built primarily on the west side of the site (Figure 5, *Conceptual Site Plan*). The east side of the site will remain in its current state. No known wildlife nursery sites occur on the project site.

Project construction would be restricted to daytime hours and would not be expected to result in adverse indirect impacts on off-site habitat adjacent to the site. Construction work limits would be contained within temporary construction fencing in accordance with mitigation measure BIO-3. Therefore, potential impacts on wildlife movement and nursery sites within the project area would be less than significant.

Issue 4 Mitigation Measures

Mitigation is not required.

ISSUE 5: Local Policies and Ordinances

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Issue 5 Impact Analysis

No Impact. The project would not conflict with local policies or ordinances protecting biological resources, as further detailed below.

Consistency with City of Perris Municipal Code

There are no City ordinances that protect biological resources on the site.

Issue 5 Mitigation Measures

Mitigation is not required.

ISSUE 6: Adopted Conservation Plans

Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?

Issue 6 Impact Analysis

Less than Significant. The project occurs within the boundaries of the adopted MSHCP, within the Mead Valley Area Plan. The project would be consistent with the MSHCP, as detailed below.

MSHCP Consistency Analysis

The purpose of this section is to provide an analysis of the project with respect to consistency with biological resources aspects of the MSHCP.

The project was evaluated for consistency with the following MSHCP issue areas:

- MSHCP Reserve Assembly requirements;
- Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools);
- Section 6.1.3 (Protection of Narrow Endemic Plant Species);
- Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface);
- Section 6.3.2 (Additional Survey Needs and Procedures); and,
- Section 6.4 (Fuels Management).

The sections below provide a summary demonstrating how the project is consistent with MSHCP requirements for each of the above-listed issue areas.

Project Relationship to the Reserve Assembly

The study area is located in the Mead Valley Area Plan of the MSHCP, outside of a Criteria Cell (Figure 4). Based on the limited size and nature of the project, composition of the habitats proposed for impacts, location of the impacts adjacent to development, and location outside of a Criteria Cell, implementation of the project would not conflict with the conservation goals of the MSHCP. The project is consistent with MSHCP Reserve Assembly requirements.

Consistency with Multiple Species Habitat Conservation Plan Section 6.1.2

The project is consistent with the policies of Section 6.1.2 that protect species associated with Riparian/Riverine Areas and Vernal Pools. The project was redesigned to minimize impacts by locating the project footprint entirely outside of Riparian/Riverine Areas. No vernal pools, ephemeral ponds, or similar habitat exist within the study area and no associated species are expected to occur. The project

would completely avoid direct impacts to Riparian Areas within the southeast corner of the project and implement mitigation measure BIO-3 to avoid indirect impacts to Riparian/Riverine Areas to the maximum extent possible.

No plant or animal species listed in Section 6.1.2 was observed within the study area. Therefore, impacts to Riparian/Riverine Species are less than significant.

Consistency with Multiple Species Habitat Conservation Plan Section 6.1.3

As discussed above, the project site is not within a NEPSSA, no NEPSSA plant species were observed during the general biological survey, and none are expected to occur within the project impact footprint; therefore, no impacts to NEPSSA species are proposed. The project is consistent with Section 6.1.3 of the MSHCP.

Consistency with Multiple Species Habitat Conservation Plan Section 6.1.4

The project area is located 200 feet south of PQP land. The Urban/Wildland Interface Guidelines (UWIG) of MSHCP Section 6.1.4 apply to projects that occur within or adjacent to the conservation area under the MSHCP. This project is separated from MSHCP conservation areas by a road and a residential development; therefore, the project is not adjacent to the PQP land and will be consistent with this requirement.

Consistency with Multiple Species Habitat Conservation Plan Policy Section 6.3.2

The project is not within CASSA; therefore, a focused rare plant survey was not conducted.

A burrowing owl habitat assessment was conducted consistent with MSHCP Section 6.3.2. There were no burrowing owls detected inside or within 100 feet of the impact area during the general biology survey; however, because burrows with potential to support burrowing owls were observed, a pre-construction burrowing owl survey will be conducted prior to project initiation. The habitat assessment determined that the site does not have the potential to support three pairs of burrowing owls, nor does it support 35 acres of suitable burrowing owl habitat; therefore, on-site conservation of burrowing owl habitat is not required according to MSHCP table 9-2, and a pre-construction survey and passive relocation outside of the breeding season would ensure consistency with the MSHCP. A pre-construction survey will be conducted per mitigation measure BIO-2.

Fuels Management (Multiple Species Habitat Conservation Plan Section 6.4)

There are no fuel management restrictions for this project because the project is not adjacent to MSHCP Conservation Area; therefore, Section 6.4 does not apply to this project.

Multiple Species Habitat Conservation Plan Development Fee

The project is not a residential or commercial development project and would not be subject to the associated per acre fee.

Stephens' Kangaroo Rat Fee

The project is not a residential or commercial development project and would not be subject to the associated per acre fee.

ISSUE 6 Mitigation Measures

Mitigation is not required for the project.

CLOSING

The proposed biological mitigation measures for the project are summarized in Table 4, *Summary of Biological Mitigation Measures*.

**Table 4
SUMMARY OF BIOLOGICAL MITIGATION MEASURES**

Impact	Proposed Mitigation	Level of Significance After Mitigation
Issue 1 Nesting Birds	BIO-1 Nesting Bird and Raptor Avoidance. If initial grading and vegetation removal activities (i.e., earthwork, clearing, and grubbing) must occur during the general bird breeding season for migratory birds and raptors (January 15 through September 15), the project applicant shall retain a qualified biologist to perform a pre-construction survey of potential nesting habitat to confirm the absence of active nests belonging to migratory birds and raptors afforded protection under the MBTA and CFG Code. The pre-construction survey shall be performed no more than seven days prior to the commencement of the activities. If the qualified biologist determines that no active migratory bird or raptor nests occur within 300 feet of the impact site (500 feet for raptors), the activities shall be allowed to proceed without any further requirements. If the qualified biologist determines that an active migratory bird or raptor nest is present, no impacts shall occur until the young have fledged the nest and the nest is confirmed to no longer be active, or until noise barriers have been installed that adequately protect the nest, as determined by the qualified biologist.	Less than significant
Issue 1 Burrowing Owls	BIO-2 Burrowing Owl Pre-construction Survey. A pre-construction burrowing owl survey shall be conducted. The burrowing owl pre-construction survey shall be conducted in accordance with the protocol described in the Burrowing Owl Survey Instruction for the Western Riverside Multiple Species Habitat Conservation Plan Area (County 2006). The initial take avoidance survey shall occur within 30 days prior to initiating ground disturbing activities. The project shall avoid disturbing active burrowing owl burrows (active nests), and a buffer shall be established between construction activities and occupied burrows, at the discretion of the biologist. If an adequate avoidance buffer cannot be provided between an occupied burrow and required ground-disturbing activities, then passive relocation activities during the non-breeding	Less than significant

Table 4
SUMMARY OF BIOLOGICAL MITIGATION MEASURES

Impact	Proposed Mitigation	Level of Significance After Mitigation
	season (September 1 through February 29) may be authorized in consultation with CDFW, which would include preparation, approval, and implementation of a Burrowing Owl Exclusion Plan in accordance with protocol described in the CDFW Staff Report on Burrowing Owl Mitigation. No impacts shall occur to active burrowing owl nests. .	
Issue 2 Riparian Habitat and Sensitive Natural Communities	BIO-3 Construction Fencing. Temporary construction fencing (with silt barriers as needed according to the stormwater pollution prevention plan [SWPPP]) shall be installed at the limits of project impacts (including construction staging areas and access routes) adjacent to sensitive habitat to prevent sensitive habitat impacts and to prevent the spread of silt from the construction zone into adjacent habitats. Temporary fencing shall be located on the eastern boundary of the impact area west of the mule fat and tamarisk scrub (Figure 7). Fencing shall be installed in a manner that does not impact habitats to be avoided.	Less than significant

We appreciate the opportunity to provide you with this letter report. Please do not hesitate to contact me or Karl Osmundson at (619) 462-1515 if you have any questions or require further assistance.

Sincerely,



Beth Ehsan
Biology Project Manager

Attachments

- Figure 1: Regional Location
- Figure 2: USGS Topography
- Figure 3: Aerial Photograph
- Figure 4: MSHCP Criteria Cells
- Figure 5: Conceptual Site Plan
- Figure 6: Soils
- Figure 7: Vegetation and Sensitive Species
- Figure 8: Potentially Jurisdictional Areas
- Figure 9: Impacts

- Attachment A Plant Species Observed
- Attachment B Animal Species Observed or Detected
- Attachment C Special-Status Species with Potential to Occur
- Attachment D Explanation of Status Codes for Plant and Animal Species
- Attachment E Representative Site Photographs

REFERENCES

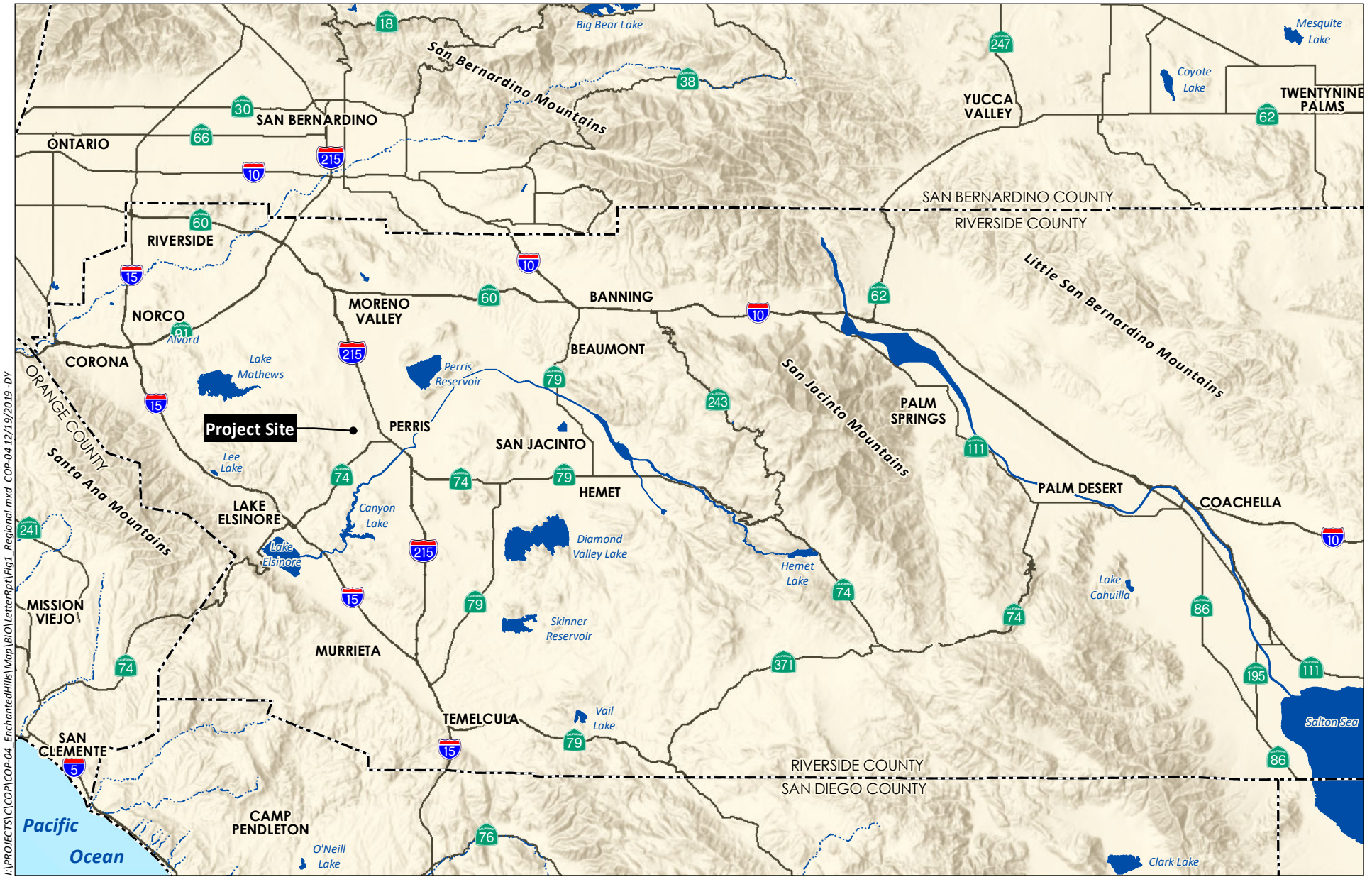
- American Ornithological Society. 2019. Checklist of North and Middle American Birds (online checklist). Retrieved from: <http://checklist.aou.org/taxa/>.
- Bradley, R.D., Ammerman, L.K., Baker, R.J., Bradley, L.C., Cook, J.A., Dowler, R.D. Jones, C., Schmidly, D.J, Stangi, F.B., Van De Bussche, R.A., Wursig, B. (2014). Revised checklist of North American mammals north of Mexico. Museum of Texas Tech University Occasional Papers. 327:1-27.
- Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken, editors. 2012. The Jepson Manual: Vascular plants of California. 2nd edition. University of California Press, Berkeley.
- Calflora. 2019. <https://www.calflora.org/> Accessed December 20.
- California Department of Fish and Wildlife (CDFW). 2019. California Natural Diversity Database (CNDDDB). RareFind 5. Retrieved from: <https://apps.wildlife.ca.gov/myaccount/login?ReturnUrl=%2frarefind%2fview%2fRareFind.aspx>. California Department of Fish and Wildlife Data accessed November 20.
2012. Staff Report on Burrowing Owl Mitigation. March 7.
- California Native Plant Society (CNPS). 2019. Inventory of rare and endangered plants. Rare Plant Program. Online edition, v8-02. Retrieved from: <http://cnps.site.aplus.net/cgi-bin/inv/inventory.cgi>. Updated quarterly. Accessed November 20.
- Dudek and Associates. 2003. Western Riverside County multiple species habitat conservation plan (MSHCP). Final MSHCP, Volume I. Prepared for the County of Riverside Transportation and Land Management Agency. Approved June 17.
- Google Earth. 2019. Google Earth 5.0. Available for download online at: <https://www.google.com/earth/>.
- Holland R.F. 1986. Preliminary descriptions of the terrestrial natural communities of California. Nongame-Heritage Program: State of California, Department of Fish and Game, Sacramento. 156 pp.
- Jackson, L. 1985. Ecological origins of California's Mediterranean grasses. Journal of Biogeography 12: 349-361.
- Natural Resource Conservation Service (NRCS). 2019. National Resource Conservation Service web soil survey. Retrieved from: <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>.
- Riverside, County of. 2006. Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area. Environmental Programs Department. Retrieved from: https://www.wrc-rca.org/archivecdn/Monitoring/Burrowing_Owl_Survey_Instructions.pdf. March 29.

Taggart, T.W. 2012. The Center for North American Herpetology (CNAH): The Academic Portal to North American Herpetology. Retrieved from: <http://www.cnah.org/>.

U.S. Fish and Wildlife Service (USFWS). 2019a. Critical Habitat Portal. Retrieved from: <http://ecos.fws.gov/crithab>.

2019b. IPaC Information for Planning and Conservation. Retrieved from: <https://ecos.fws.gov/ipac/>.

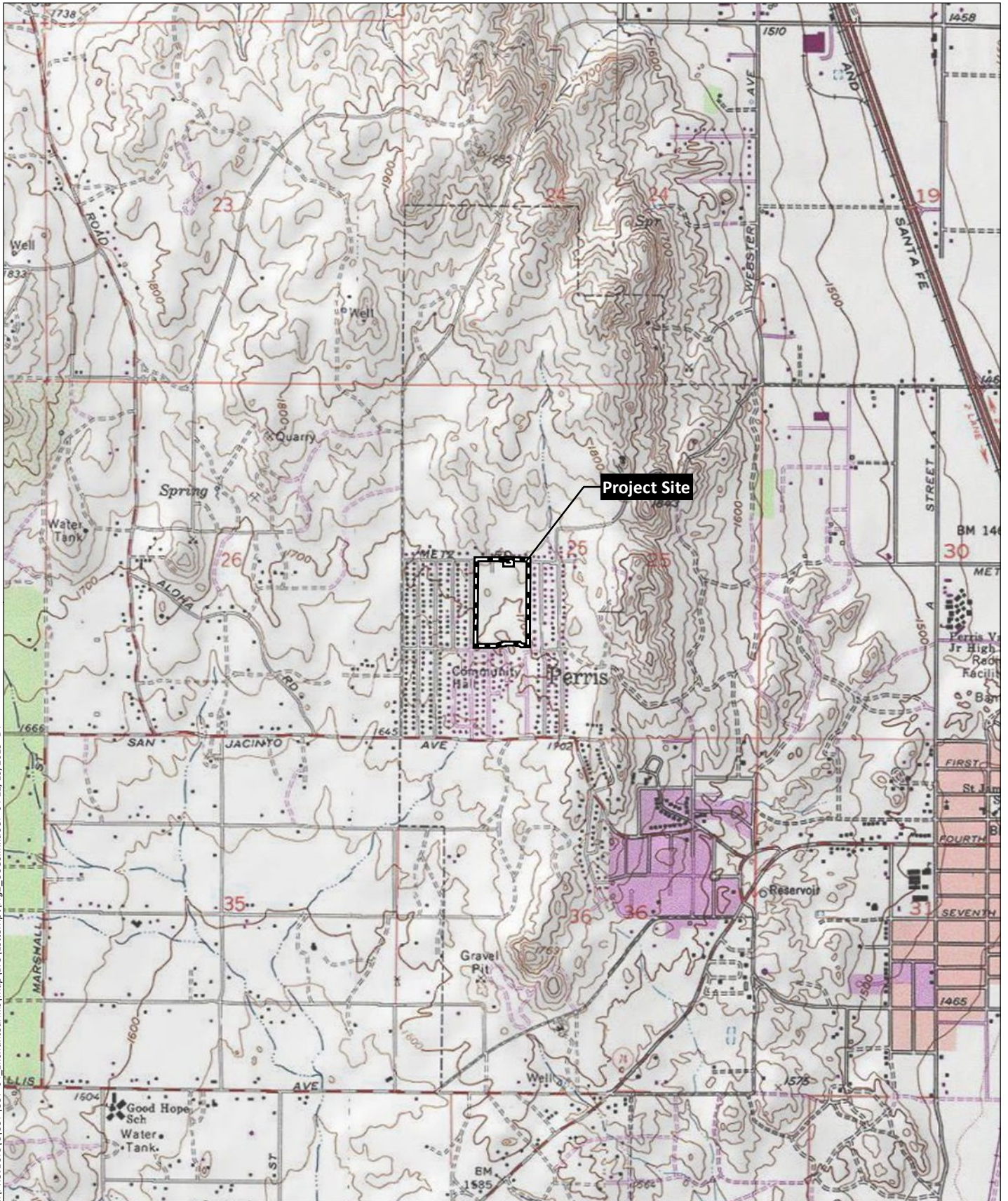
2019c. National Wetlands Inventory. Retrieved from: <https://www.fws.gov/wetlands>.



F:\PROJECTS\COP\COP-04_EnchantedHills\Map\BIO\Letter\fig1_Regional.mxd COP-04 12/19/2019 -DY

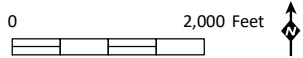


Source: Base Map Layers (ESRI, 2013)



I:\PROJECTS\COP\COP-04_EnchantedHills\Map\BIO\Letter\p1\Fig2_USGS.mxd\COP-04_12/19/2019-DY

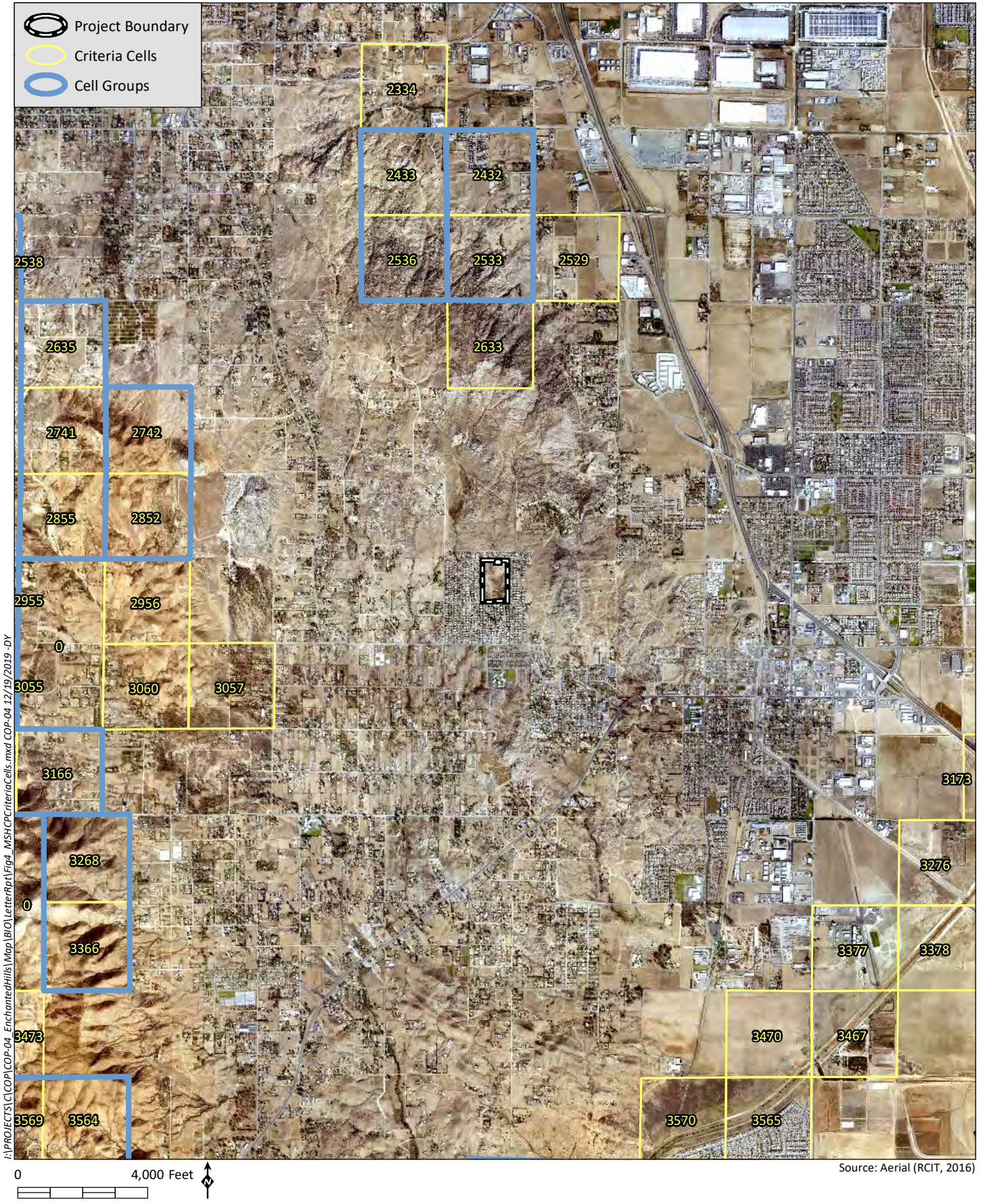
Source: Steele Park 7.5' Quad (USGS)





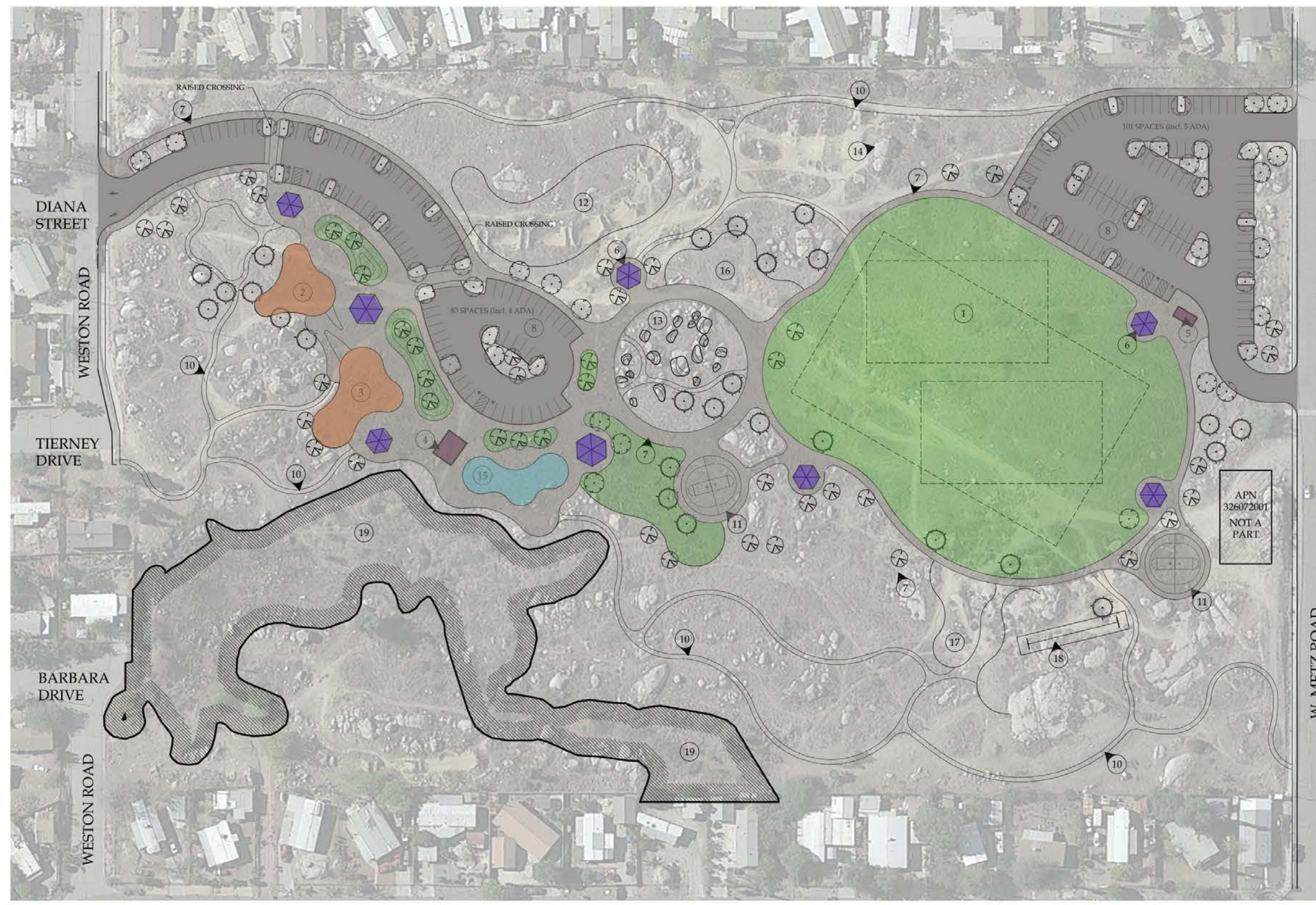
I:\PROJECTS\COP\COP-04_EnchantedHills\Map\BIO\Letterfpt\Figs_Aerial.mxd COP-04 12/19/2019 -DY

Source: Aerial (RCIT, 2016)

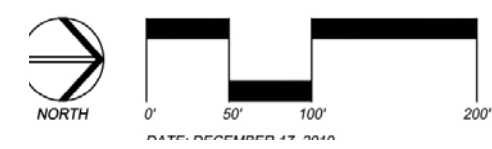


I:\PROJECTS\COP\COP-04_EnchantedHills\Map\BIO\Letter\Fig4_MSHCPCriteriaCells.mxd COP-04 12/19/2019 -DY

I:\PROJECTS\COP-04_EnchantedHills\Map\BIO\Letter\Fig4_SitePlan.mxd COP-04_12/19/2019_DY



- LEGEND:**
- 1 MULTI-USE FIELD
 - 2 CHILD PLAY AREA
 - 3 TOT PLAY AREA
 - 4 LARGE RESTROOM BUILDING
 - 5 SMALL RESTROOM BUILDING
 - 6 PICNIC SHELTERS
 - 7 HARDSCAPE
 - 8 PARKING LOTS
 - 9 BRIDGES
 - 10 TRAILS
 - 11 HALF-COURT BASKETBALL
 - 12 BMX COURSE IMPROVEMENTS
 - 13 ART ROCKS
 - 14 PROTECT EXISTING OWL ROCK
 - 15 SPLASH PLAY
 - 16 SKATE SPOT
 - 17 ADVENTURE PLAY
 - 18 ZIP LINE
 - 19 RIPARIAN/RIVERINE AREAS





Source: City of Perris 2019



Project Boundary

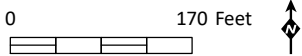
Soils

 Cieneba rocky sandy loam, 8 to 15 percent slopes, eroded

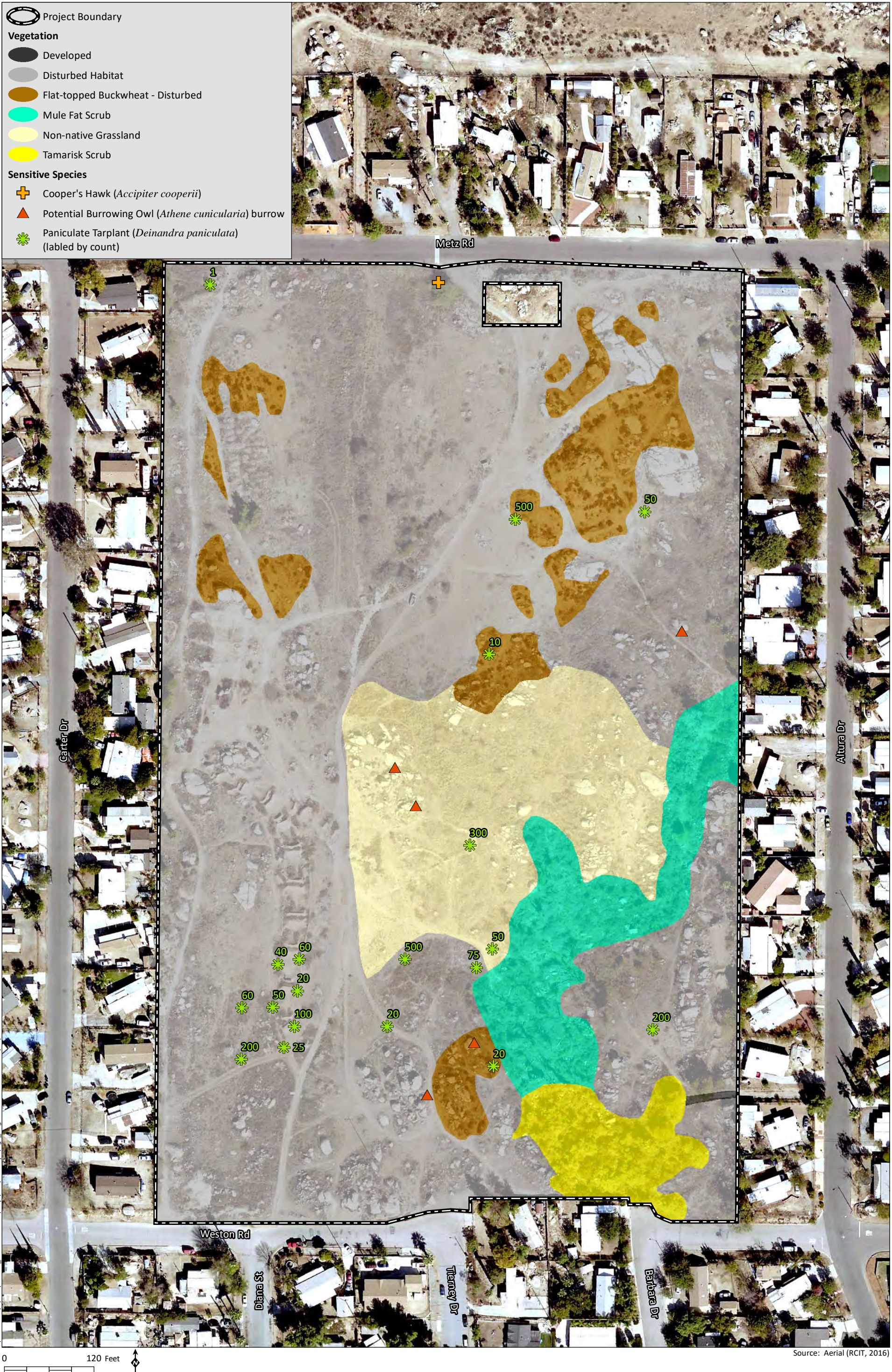
 Hanford coarse sandy loam, 2 to 8 percent slopes






I:\PROJECTS\COP\COP-04 - EnchantedHills\Map\BIO\Letter\ rpt\Figs Soils.mxd COP-04 12/19/2019 -DY



Source: Aerial (RCIT, 2016)



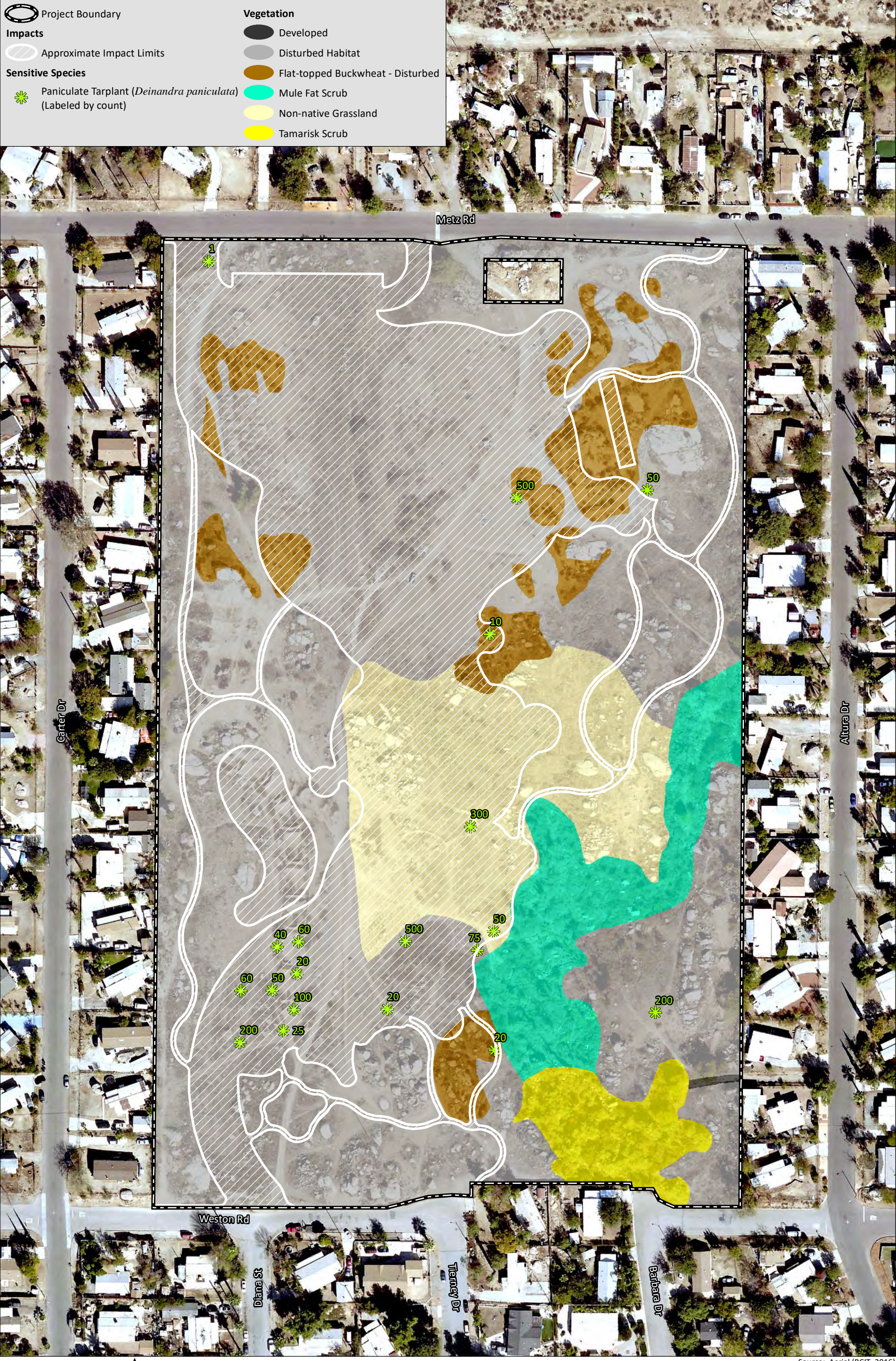
I:\PROJECTS\ICOP\CP-04 - EnchantedHills\Map\BRO\LetterRpt\Fig7 - Vegetation.mxd CP-04 12/23/2019 -DY

 Project Boundary
Potentially Jurisdictional Areas
 Mule Fat Scrub
 Tamarisk Scrub



I:\PROJECTS\COP-04_EnchantedHills\Map\BIO\Letter\figs_PotenJurisAreas.mxd COP-04 12/19/2019_DY

Source: Aerial (RCIT, 2016)



I:\PROJECTS\ICOP\04 - EnchantedHills\Map\BIO\LetterRpt\Fig9 - Impacts.mxd COP-04 12/23/2019 - DY

Attachment A

PLANT SPECIES OBSERVED

Family	Scientific Name	Common Name
ANGIOSPERMS – EUDICOTS		
Adoxaceae	<i>Sambucus nigra</i> ssp. <i>caerulea</i>	blue elderberry
Aizoaceae	<i>Malephora crocea</i> *	coppery mesembryanthemum
Anacardiaceae	<i>Schinus molle</i> *	Peruvian pepper tree
Asteraceae	<i>Baccharis salicifolia</i>	mule fat
	<i>Corethrogyne filaginifolia</i>	common sandaster
	<i>Deinandra paniculata</i>	paniculate tarplant
	<i>Encelia farinosa</i>	brittlebush
	<i>Ericameria palmeri</i>	Palmer's goldenbush
	<i>Erigeron canadensis</i>	horseweed
	<i>Helianthus annuus</i>	western sunflower
	<i>Heterotheca grandiflora</i>	telegraph weed
	<i>Lactuca serriola</i> *	wild lettuce
Boraginaceae	<i>Amsinckia</i> sp.	fiddleneck
	<i>Heliotropium curassavicum</i> var. <i>occulatum</i>	salt heliotrope
Brassicaceae	<i>Hirschfeldia incana</i> *	short-pod mustard
Cactaceae	<i>Cylindropuntia californica</i>	California cholla
	<i>Opuntia ficus-indica</i> *	Mission cactus
Chenopodiaceae	<i>Atriplex semibaccata</i> *	Australian saltbush
	<i>Amaranthus albus</i> *	white tumbleweed
	<i>Chenopodium</i> sp.*	pigweed
	<i>Salsola tragus</i> *	Russian thistle
Cucurbitaceae	<i>Cucurbita palmata</i>	coyote melon
Euphorbiaceae	<i>Croton setigerus</i>	dove weed
	<i>Ricinus communis</i> *	castor bean
Fabaceae	<i>Acemisson glaber</i>	deerweed
	<i>Parkinsonia aculeata</i> *	Mexican palo verde
	<i>Prosopis glandulosa</i>	honey mesquite
Lamiaceae	<i>Marrubium vulgare</i> *	horehound
Malvaceae	<i>Malacothamnus fasciculatus</i>	chaparral bush mallow
Myrtaceae	<i>Eucalyptus</i> sp.*	eucalyptus
Polygonaceae	<i>Eriogonum fasciculatum</i>	buckwheat
	<i>Populus fremontii</i> ssp. <i>fremontii</i>	Fremont cottonwood
	<i>Salix gooddingii</i>	Goodding's black willow
Salicaceae	<i>Salix laevigata</i>	red willow
	<i>Datura wrightii</i>	jimson weed
Solanaceae	<i>Nicotiana glauca</i> *	tree tobacco
Tamaricaceae	<i>Tamarix ramosissima</i> *	saltcedar
Urticaceae	<i>Urtica dioica</i>	stinging nettle

Attachment A (cont.)

Plant Species Observed (cont.)

Family	Scientific Name	Common Name
ANGIOSPERMS – MONOCOTS		
Areaceae	<i>Washingtonia robusta</i> *	Mexican fan palm
Agavaceae	<i>Agave americana</i> *	century plant
Poaceae	<i>Avena</i> sp.*	oat
	<i>Bromus diandrus</i> *	common ripgut brome
	<i>Bromus madritensis</i> ssp. <i>rubens</i> *	foxtail chess
	<i>Elymus condensatus</i>	giant wild rye
	<i>Schismus barbatus</i> *	Mediterranean grass

* Non-native species

Attachment B

ANIMAL SPECIES OBSERVED OR DETECTED

Order	Family	Scientific Name	Common Name
Invertebrates			
Hymenoptera	Formicidae		ant
Lepidoptera	Hesperiidae	<i>Pyrgus albescens</i>	white checkered-skipper
	Lycaenidae	<i>Brephidium exila</i>	western pygmy-blue
	Nymphalidae	<i>Vanessa cardui</i>	painted lady
Reptiles			
Squamata			lizard
Birds			
Accipitriformes	Accipitridae	<i>Accipiter cooperii</i> †	Cooper's hawk
		<i>Buteo jamaicensis</i>	red-tailed hawk
		<i>Cathartes aura</i>	turkey vulture
Apodiformes	Trochilidae		hummingbird
Columbiformes	Columbidae	<i>Zenaida macroura</i>	mourning dove
Falconiformes	Falconidae	<i>Falco sparverius</i>	American kestrel
Passeriformes	Corvidae	<i>Aphelocoma californica</i>	California scrub-jay
		<i>Corvus brachyrhynchos</i>	American crow
	Fringillidae	<i>Haemorhous mexicanus</i>	house finch
	Mimidae	<i>Mimus polyglottos</i>	northern mockingbird
	Passerellidae	<i>Melospiza crissalis</i>	California towhee
<i>Zonotrichia leucophrys</i>		white-crowned sparrow	
Piciformes	Picidae	<i>Dryobates nuttallii</i>	Nuttall's woodpecker
Mammals			
Carnivora	Canidae	<i>Canis latrans</i>	coyote
Lagomorpha	Leporidae	<i>Sylvilagus audubonii</i>	desert cottontail
Perissodactyla	Equidae	<i>Equus ferus caballus</i>	horse
Rodentia	Sciuridae	<i>Otospermophilus beecheyi</i>	California ground squirrel

† Sensitive species

Attachment C

**Table 1
POTENTIAL FOR LISTED OR SENSITIVE PLANTS TO OCCUR ON-SITE**

Species	Sensitivity Status*	Habitat/Description	Status on Site
San Jacinto Valley crownscale (<i>Atriplex coronata</i> var. <i>notatior</i>)	FE/-- CRPR 1B.1	Herb. Occurs in playas, chenopod scrub, valley and foothill grassland, and vernal pools. Elevation range: 1,250 to 1,805 feet. Flowering period: April – August.	Not expected. Nearest observation is 1.6 miles southeast of the project site in 1965. No playas or vernal pools occur on site.
Thread-leaved brodiaea (<i>Brodiaea filifolia</i>)	FT/SE CRPR 1B.1	Herb. Found in semi alkaline mud flats and vernal pools, in clay soils. Elevation range: 82-2,821 feet. Flowering period: March - June.	Not expected. Habitat does not occur in project area. No clay soils occur in the project site. Closest observation is over two miles from the project site.
Smooth tarplant (<i>Centromadia pungens</i> spp. <i>laevis</i>)	--/-- CRPR 1B.1	Herb. Occurs in riparian/watercourse, grassland, and alkali scrub. Does well in disturbed areas. Elevation range: 295 – 1640 feet. Flowering period: April - September.	Not expected. Closest observation to the site was over two miles to the southeast. The site is above the elevation range for the species.
Long-spined spineflower (<i>Chorizanthe polygonoides</i> var. <i>longispina</i>)	--/-- CRPR 1B.1	Herb. Occurs in chaparral, sage scrub, grassland, often in clay soils. Elevation range: 98 – 4,921 feet. Flowering period: April - July.	Not expected. Chaparral and sage scrub not present. No clay soils occur on site.
Paniculate tarplant (<i>Deinandra paniculata</i>)	--/-- CRPR 4.2	Herb. Occurs in valley grassland, usually in non-wetland and occasionally in wetlands. Elevation range: 0 – 4330 feet. Flowering period: April – November.	Present. This species was observed on site during the general biological survey.
Spreading navarretia (<i>Navarretia fossalis</i>)	FT/-- CRPR 1B.1	Herb. Occurs in vernal pools. Elevation range: 98 – 4,265 feet. Flowering period: April - June.	Not expected. No vernal pools occur on site.

Attachment C (cont.)

**Table 2
POTENTIAL FOR LISTED OR SENSITIVE ANIMALS TO OCCUR ON-SITE**

Species	Sensitivity Status*	Habitat	Status On Site
Cooper’s hawk (<i>Accipiter cooperii</i>)	--/WL	Oak groves, mature riparian woodlands, and eucalyptus stands or other mature forests.	Present. This species was observed on site during the general biological survey.
Southern California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>)	--/WL	Hillsides, with grassland, sage scrub, or chaparral.	Moderate. Species has been observed north of the site less than half a mile away. The disturbed nature of the project site makes it less likely to support this species.
California glossy snake (<i>Arizona elegans occidentalis</i>)	--/SSC	Scrub and grassland habitats, usually with loose or sandy soils. A generalist.	Low. Non-native grassland and sandy loam soils are present but are heavily disturbed due to human activity.
Burrowing owl (<i>Athene cunicularia</i>)	--/SSC	Grassland, fallow agriculture, and areas of sparse cover, preferably with burrows of fossorial mammals.	Low. Habitat with low potential occurs in the study area. This species was observed 0.5 mile north of the site in 2015. Most records of this species in the area occur east of the 215 freeway. Burrowing resources on site were minimal.
Crotch bumblebee (<i>Bombus crotchii</i>)	--/--	Scrub and grassland habitats. Uses sage, sunflowers, and similar species for nectar.	Low. This species was observed near (or possibly on) the site in 1982. Grassland and sunflowers were present on site. No records of the species on or near the site have been documented within the last 37 years.
Western pond turtle (<i>Clemmys marmorata pallida</i>)	--/SSC	Slow-moving streams, ponds, reservoirs, other water bodies deeper than 6 feet with logs or other submerged cover.	Not expected. Species record in the vicinity of the project site is from 1933. The population was documented as being extirpated at that time.
Orange-throated whiptail (<i>Cnemidophorus hyperthrus</i>)	--/WL	Chaparral, sage scrub, grassland, woodland, riparian areas.	Moderate. Species was observed within 0.5 mile of the project site in 1999. Suitable grassland and riparian habitat occur on site.
Coastal western whiptail (<i>Cnemidophorus tigris stenjnegeri</i>)	--/SSC	Open rocky areas with sparse vegetation usually scrub or grassland.	Moderate. Species was observed within 0.5 mile of the project site in 1999. Suitable rock outcrops, sparse vegetation, and grassland occur on site.
Red-diamond rattlesnake (<i>Crotalus ruber</i>)	--/SSC	Heavy brush, boulders, can use a variety of habitats. Prey density a determining factor.	Moderate. Species observed within 2.5 miles of the site in 2006. Boulders and ground squirrels observed on site.

Attachment C (cont.)

Table 2 (cont.)
 POTENTIAL FOR LISTED OR SENSITIVE ANIMALS TO OCCUR ON SITE

Species	Sensitivity Status*	Habitat	Status On Site
Stephens' kangaroo rat (<i>Dipodomys stephensi</i>)	FE/ST	Open areas with sparse perennial cover and loose soil.	Moderate. Multiple observations were made within 0.5 mile of the site as recently as 2017. The site has sparse cover but is highly disturbed by dumping. No kangaroo rat nests were observed during the general biological survey.
Southern grasshopper mouse (<i>Onychomys torridus ramona</i>)	--/SSC	Grassland and sparse sage scrub.	Not expected. Closest observation occurred in 1923. More recent observations are south of Diamond Valley Lake.
Coast horned lizard (<i>Phrynosoma coronatum blainvillei</i>)	--/SSC	Grassland, scrub, chaparral, woodland.	Moderate. Grassland habitat occurs on site and this species was observed within half a mile of the site in 2003.
Coastal California gnatcatcher (<i>Polioptila californica californica</i>)	FT/SSC	Coastal sage and other low scrub.	Not expected. Habitat for species does not occur on site.
Western spadefoot (<i>Scaphiopus hammondi</i>)	--/SSC	Grassland, sage scrub or occasionally chaparral. Standing water, puddles, vernal pools, needed for reproduction.	Low. Species was observed 0.5 miles from the project site in 2009; however, no vernal pools or standing water were noted on site at the time of the general biological survey.

Attachment D

Explanation of Status Codes for Plant and Animal Species

FEDERAL AND STATE CODES

U.S. Fish and Wildlife Service (USFWS)

BCC	Bird of Conservation Concern
BGEPA	Bald and Golden Eagle Protection Act
FC	Federal candidate species
FE	Federally listed endangered
FPD	Federally proposed for delisting
FPE	Federally proposed endangered
FPT	Federally proposed threatened
FT	Federally listed threatened

USFWS Birds of Conservation Concern (BCC)

The primary legal authority for Birds of Conservation Concern (2008) is the Fish and Wildlife Conservation Act of 1980 (FWCA), as amended. Other authorities include the Endangered Species Act, Fish and Wildlife Act (1956) and 16 USC §701. A FWCA 1988 amendment (Public Law 100-653, Title VIII) requires the Secretary of the Interior through the USFWS to “identify species, subspecies, and populations of all migratory non-game birds that, without additional conservation actions, are likely to become candidates for listing under the Endangered Species Act of 1973.” The 2008 BCC report is the most recent effort by the USFWS to carry out this proactive conservation mandate.

The BCC report aims to identify accurately the migratory and non-migratory bird species (beyond those already designated as federally threatened or endangered) that represent the USFWS’ highest conservation priorities and draw attention to species in need of conservation action. The USFWS hopes that by focusing attention on these highest priority species, the report will promote greater study and protection of the habitats and ecological communities upon which these species depend, thereby ensuring the future of healthy avian populations and communities. Birds of Conservation Concern 2008 lists are available online at <https://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>.

USFWS Federal Candidate (FC) Species

Federal candidate species are those for which the USFWS has on file “sufficient information on biological vulnerability and threats to support a proposal to list as endangered or threatened, but for which preparation and publication of a proposal is precluded by higher-priority listing actions. [The USFWS] maintain[s] this list for a variety of reasons: to notify the public that these species are facing threats to their survival; to provide advance knowledge of potential listings that could affect decisions of environmental planners and developers; to provide information that may stimulate conservation efforts that will remove or reduce threats to these species; to solicit input from interested parties to help us identify those candidate species that may not require protection under the [Endangered Species Act] or additional species that may require the Act’s protections; and to solicit necessary information for setting priorities for preparing listing proposals” (Federal Register 70:90 [May 11, 2005]).

Attachment D (cont.)

USFWS Federal Proposed Endangered (FPE) Species

Any species the Service has determined is in danger of extinction throughout all or a significant portion of its range and the Service has proposed a draft rule to list as endangered. Proposed endangered species are not protected by the take prohibitions of section 9 of the ESA until the rule to list is finalized. Under section 7(a)(4) of the ESA, federal agencies must confer with the Service if their action will jeopardize the continued existence of a proposed species.

USFWS Federal Proposed Threatened (FPT) Species

Any species the Service has determined is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and the Service has proposed a draft rule to list as threatened. Proposed threatened species are not protected by the take prohibitions of section 9, consistent with any protective regulations finalized under section 4(d) of the ESA, until the rule to list is finalized. Under section 7(a)(4) of the ESA, federal agencies must confer with the Service if their action will jeopardize the continued existence of a proposed species.

USFWS Bald and Golden Eagle Protection Act (BGEPA)

In 1782, Continental Congress adopted the bald eagle as a national symbol. During the next one and a half centuries, the bald eagle was heavily hunted by sportsmen, taxidermists, fisherman, and farmers. To prevent the species from becoming extinct, Congress passed the Bald Eagle Protection Act in 1940. The Act was extremely comprehensive, prohibiting the take, possession, sale, purchase, barter, or offer to sell, purchase, or barter, export or import of the bald eagle “at any time or in any manner.”

In 1962, Congress amended the Eagle Act to cover golden eagles, a move that was partially an attempt to strengthen protection of bald eagles, since the latter were often killed by people mistaking them for golden eagles. The golden eagle, however, is accorded somewhat lighter protection under the Act than the bald eagle. Another 1962 amendment authorizes the Secretary of the Interior to grant permits to Native Americans for traditional religious use of eagles and eagle parts and feathers.

California Department of Fish and Wildlife (CDFW)

SCE	State candidate for listing as endangered
SCT	State candidate for listing as threatened
SE	State listed endangered
SR	State listed rare
ST	State listed threatened
SSC	State species of special concern
WL	Watch List
FP	Fully Protected species refers to all vertebrate and invertebrate taxa of concern to the Natural Diversity Data Base regardless of legal or protection status. These species may not be taken or possessed without a permit from the Fish and Game Commission and/or CDFW.
Special Animal	Refers to all vertebrate and invertebrate taxa of concern to the Natural Diversity Database regardless of legal or protection status.

Attachment D (cont.)

California Environmental Quality Act (CEQA)

For plants with no current federal or state legal standing, “CEQA” refers to the fact that under the Act, impacts to species may be found significant under certain circumstances (e.g., the species are regionally sensitive and/or are protected by a local policy, ordinance, or habitat conservation plan; or the impact involves interference with certain movements or migrations, with wildlife corridors or with nursery sites).

County of Riverside

Multiple Species Habitat Conservation Plan (MSHCP) Covered

MSHCP Covered Species indicates that the species is part of a proposed list of species (146 total) considered at this time to be adequately conserved by the Western Riverside County MSHCP, provided that participants meet all conditions listed in the Final MSHCP. These species are discussed in Section 2.1.4 and 9.2 of the MSHCP, Volume 1.

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Group Designation

Group 1 – Take coverage is warranted based upon regional or landscape level considerations, such as healthy population levels, widespread distribution throughout the MSHCP Plan Area, and life history characteristics that respond to habitat-scale conservation and management actions.

Group 2 – Take coverage is warranted based upon regional or landscape level considerations with the addition of site-specific conservation and management requirements that area clearly identified in the MSHCP for species that are generally well distributed but that have core habitats that require conservation.

Group 3 – Take coverage is warranted based upon site-specific considerations and the identification of specific conservation and management conditions for species within a narrowly defined habitat or limited geographic area within the MSHCP Plan Area.

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Special Species Acronyms/Abbreviations

NEPSSA	Narrow Endemic Plant Species Survey Area species – Designated Area where focused surveys are required for plant species that are highly restricted by their habitat affinities, edaphic requirements, or other ecological factors, and for which specific conservation measures have been identified in Section 6.1.3 of the MSHCP, Volume I.
CASSA	Criteria Area Species Survey Area – Designated areas where focused surveys for specific species are required. These are species for which existing available information is not sufficient, and for which specific conservation measures have been identified in Section 6.3.2 of the MSHCP, Volume I.
Planning Species	Subsets of Covered Species that are intended to provide guidance for MSHCP Reserve assembly in Cores, Linkages, and Area Plans.

Attachment D (cont.)

OTHER CODES AND ABBREVIATIONS

California Native Plant Society California Rare Plant Rank (CRPR) Codes

Lists

1A = Presumed extirpated in California and either rare or extinct elsewhere. Eligible for state listing.

1B = Rare, threatened, or endangered in California and elsewhere. Eligible for state listing.

2A = Presumed extirpated in California but common elsewhere. Eligible for state listing.

2B = Rare, threatened, or endangered in California but more common elsewhere. Eligible for state listing.

3 = Review List: Plants about which more information is needed. Some eligible for state listing.

4 = Watch List: Plants of limited distribution. Needs monitoring for changes in population status. Few (if any) eligible for state listing.

List/Threat Code Extensions

.1 = Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)

.2 = Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

.3 = Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

A "CA Endemic" entry corresponds to those taxa that only occur in California.

All List 1A (presumed extinct in California) and some List 3 (need more information; a review list) plants lacking threat information receive no extension. Threat Code guidelines represent only a starting point in threat level assessment. Other factors, such as habitat vulnerability and specificity, distribution, and condition of occurrences, are considered in setting the Threat Code.



Photo 1: Center of site looking southeast. Non-native grasses dominate the foreground with mule fat scrub in the background.



Photo 2: Typical non-native grassland, looking northeast from the center of the site.

G:\Marketing Folder\Proposals\LETTER PROPOSALS\2019\Perris Enchanted Hills Park\Bio\Report\photos



Photo 3: Disturbed flat-topped buckwheat scrub along the western edge of the site.



Photo 4: Typical disturbed habitat. Photo taken along the western edge of the site, looking north.

G:\Marketing Folder\Proposals\LETTER PROPOSALS\2019\Perris Enchanted Hills Park\Bio\Report\photos



Photo 5: Typical tamarisk scrub at the southern end of the project site. Photo is facing north.



Photo 6: Typical mule fat scrub habitat along the eastern boundary of the project site.

G:\Marketing Folder\Proposals\LETTER PROPOSALS\2019\Perris Enchanted Hills Park\Bio\Report\photos



Photo 7: Existing bike jumps in western central portion of site. Photo is facing north.



Photo 8: Trash was observed throughout the site.

G:\Marketing Folder\Proposals\LETTER PROPOSALS\2019\Perris Enchanted Hills Park\Bio\Report\photos



Photo 9: The presence of rodent burrows mean there is a potential for burrowing owls to occur on site.

G:\Marketing Folder\Proposals\LETTER PROPOSALS\2019\Perris Enchanted Hills Park\Bio\Report\photos