

**Western Riverside County
Multiple Species Habitat Conservation Plan
Consistency Analysis**

Ellis Avenue Project

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1 EXECUTIVE SUMMARY

Provide an overview of the proposed project in relation to the MSHCP requirements. Include applicable Criteria Cell(s) or Cell Group (both, as applicable), Cores and Linkages, surveys required by the MSHCP, survey results, impacts including temporary and/or permanent, off-site areas (if applicable), proposed staging areas outside of the main project footprint, and proposed mitigation (if applicable).

2 INTRODUCTION

The project site is located within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) within Criteria Cell 3276, an independent Criteria Cell, that contributes to the assembly of Proposed Constrained Linkage 19 along the San Jacinto River. Additionally, the project site is located within the designated survey area for burrowing owl, Narrow Endemic Plant Species, and Criteria Area Plant Species.

2.1 Project Area

The project site is generally located south and west of Interstate 215, east of State Route 74, and north of the San Jacinto River in the City of Perris, Riverside County, California. The site is depicted on the Perris quadrangle of the United States Geological Survey's (USGS) 7.5-minute topographic map series in Section 5 of Township 5 South, Range 3 West. Specifically, the project site bordered by E. Ellis Avenue along its northern boundary, the Burlington Northern Santa Fe Railroad (BNSF) on its southwestern boundary, and the San Jacinto River on its southeast boundary, within Assessor's Parcel Numbers 330-090-006, and -007. Refer to Exhibits 1-3 in Attachment A.

2.2 Project Description

The project proposes the development of a +/- 671,000 square foot, Light Industrial Building and associated parking, landscaping, and infrastructure on +/- 35.52 acres. Refer to Appendix B, *Site Plan*.

2.3 Covered Roads

The proposed project does not include any improvements to covered roads.

2.4 Covered Public Access Activities

The proposed project does not entail the construction or improvements to Covered Public Access Activities.

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2.5 General Setting

Land uses in the vicinity of the project site primarily consists of undeveloped/vacant land, agriculture, residential and industrial developments, transit facilities, and active construction. The project site is bordered to the north by East Ellis Avenue with active construction beyond; to the west by undeveloped, vacant land with industrial development beyond; to the east by an existing paintball facility; and to the southwest by the BNSF railroad with Case Road and undeveloped, vacant land beyond.

The project site supports undeveloped, vacant land that has been subject to a variety of anthropogenic disturbances from historic agricultural activities, spoils dumping, vehicular access, and adjacent development. A series of vehicle access trails are present in the eastern portion of the site, connecting the access road along the BNSF railroad to East Ellis Avenue. These disturbances have eliminated the natural plant communities that historically occurred on the project site and have alternated the composition of the on-site soils.

A historic aerial review of the project site was conducted to determine the level of disturbance the project site has been subject to over recent decades. The following is a summary of the review.

1966 – 1967	The site and undeveloped land to the south and east generally support undeveloped land consistent with other farmland in the area that receives periodic flood overflows from the San Jacinto River. The site is bounded to the north by Ellis Avenue with agricultural land beyond; to the west by undeveloped, vacant land with industrial development beyond; and to the southwest by the BNSF railroad with Case Road and undeveloped, vacant land beyond. In addition, channelized portions of the San Jacinto River occur off-site to the southeast.
1967 – 1978	Channelization of nearby portions of the San Jacinto River have been strengthened with earthen levees. Evidence of floodwater encroachment into the project site from the San Jacinto River is limited compared to the previous time period.
1978 - 1985	No changes.
1985 – 1997	Land adjacent to the east and west of the project site has been cleared, better defining the eastern and western boundaries.
1997 – 2005	No changes.

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2005 – 2009	Spoils piles are present in the northeast portion of the project site.
2009 – 2014	No changes.
2014 – 2016	Facilities and infrastructure associated with the adjacent paintball facility to the east are present. Excess asphalt and fill materials from the development of the adjacent paintball facility extend along the eastern boundary of the project site,
2016 – 2018	The boundary for the paintball facility has extended to its current size. Additional structures and paved and unpaved substrates related to facility operations are present.
2018 – 2022	No changes.

3 RESERVE ASSEMBLY ANALYSIS

The entire project site is located within Criteria Cell 3276, which is an independent Cell that is not affiliated with any Cell Group. Conservation within this Cell will contribute to assembly of Proposed Constrained Linkage 19 that focuses on the assembly of grassland habitat associated with the San Jacinto River. Areas conserved within this Cell will be connected to grassland habitat and agricultural land proposed for conservation in Cell 3277 to the east and to agricultural land proposed for conservation in Cell 3378 to the south, and will range from 45%-55% of the Cell focusing on the southern portion of the Cell.

Using the mid-range area described for conservation (50%) within Criteria Cell 3276, approximately 80 acres are described for conservation within this approximately 160-acre Criteria Cell. To date, approximately 23.57 acres have been set aside in a conservation easement to the Regional Conservation Authority for the development of the adjacent paintball facility and 9.73 acres (Perris Donation) have been designated as RCA conserved lands, totaling 33.3 acres of the 80 acres described for conservation.

There are approximately 80 acres of developable lands within in Criteria Cell 3276 located outside of the southern portion (45%-55%) of this Criteria Cell that are not described for conservation. To date, approximately 37 acres have been developed within Criteria Cell 3276, leaving approximately 43 acres available for development. The following table shows the potential area within Criteria Cell 3276 available for development.

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Conservation/Project Areas	Target Conservation Acreage		
	45%	50%	55%
Criteria Cell 3276	160	160	160
Target Conservation	72	80	88
Existing Conserved Lands	(33.3)	(33.3)	(33.3)
Remaining Land Needed to Meet Reserve Assembly	38.7	46.7	54.7
Existing Development	(~37)	(~37)	(~37)
Remaining Land for Development	35	43	51

Based on the graphic depiction shown in Exhibit 7, the proposed project site is not located within the targeted conservation area and would not conflict with the conservation goals for Criteria Cell 3276 and the assembly of Proposed Constrained Linkage 19.

3.1 Public Quasi-Public Lands

3.1.1 Public Quasi-Public Lands in Reserve Assembly Analysis

The project site will not impact Public/Quasi-Public (P/QP) Lands, as there are no P/QP lands on or adjacent to the proposed project site.

4 VEGETATION MAPPING

The project site supports one plant community, non-native grassland, and one (1) land cover type that would be classified as disturbed (refer to Exhibit 5, *Vegetation in Appendix A*). Refer to Appendix C, *Site Photographs*, for representative site photographs. No native plant communities are expected to be impacted from implementation of the proposed project. According to the 1994 Vegetation Layer, which the MSHCP relies upon, the project site has been mapped as supporting Grassland. According to the 2012 Vegetation layer, the project site supports Developed/Disturbed Land.

The project site consists of undeveloped, vacant land that has been subject to a variety of anthropogenic disturbances. The entirety of the site has been subject to historic agricultural activities and the majority of the site has been subject to ongoing disking activities with the exception of remnant materials stockpiles in the northeast corner. These disturbances have eliminated the natural plant communities that historically occurred on the project site and have alternated the composition of the soils on-site.

The non-native grassland plant community supported by the majority of the site is dominated by non-native grasses such as bromes (*Bromus* spp.), Mediterranean grass (*Schismus barbatus*), and oats (*Avena* spp.). Additional species observed in the non-

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native grassland included Russian thistle (*Salsola tragus*), mustard (*Hirschfeldia incana*), Mediterranean grass (*Schismus barbatus*), filaree (*Erodium cicutarium*), and short-pod mustard (*Brassica geniculata*), foxtail chess (*Bromus madritensis* ssp. *rubens*), horehound (*Marrubium vulgare*), sandmat (*Euphorbia* sp.), telegraph weed (*Heterotheca grandiflora*), puncture vine (*Tribulus terrestris*) and jimsonweed (*Datura wrightii*).

Disturbed areas occur on the northeast corner and along site boundaries. These areas are barren or minimally vegetated with hardy ruderal/early successional species present in the non-native grassland plant community.

5 PROTECTION OF SPECIES ASSOCIATED WITH RIPARIAN/RIVERINE AREAS AND VERNAL POOLS (SECTION 6.1.2)

The MSHCP requires that an assessment be completed if impacts to riparian/riverine areas and vernal pools could occur from construction of the proposed project. According to the MSHCP, the documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species listed in Section 6.1.2 of the MSHCP, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*.

5.1 Riparian/Riverine

5.1.1 Methods

As identified in Section 6.1.2 of the MSHCP, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*, riparian/riverine areas are defined as areas dominated by trees, shrubs, persistent emergent plants, or emergent mosses and lichens which occur close to or are dependent upon nearby freshwater, or areas with freshwater flowing during all or a portion of the year. Conservation of these areas is intended to protect habitat that is essential to a number of listed or special-status water-dependent fish, amphibian, avian, and plant species. If impacts to riparian/riverine habitat cannot be avoided, a Determination of Biologically Equivalent or Superior Preservation (DBESP) must be developed to address the replacement of lost functions of habitats in regard to the listed species. This assessment is independent from considerations given to “waters of the U.S.” and “waters of the State” under the CWA and the California Fish and Game Code.

No jurisdictional drainage and/or wetland features were observed on the project site or within the project site during the field investigation. Further, no blueline streams have been recorded on the project site. Development of the proposed project will not result in impacts to riparian/riverine habitats and a DBESP will not be required for the loss of riparian/riverine habitat from development of the proposed project.

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5.2 Vernal Pools

5.2.1 *Methods*

One of the factors for determining the suitability of the habitat for fairy shrimp would be demonstrable evidence of seasonal ponding in an area of topographic depression that is not subject to flowing waters. These astatic pools are typically characterized as vernal pools. More specifically, vernal pools are seasonal wetlands that occur in depression areas without a continual source of water. They have wetland indicators of all 3 parameters (soils, vegetation, and hydrology) during the wetter portion of the growing season but normally lack wetland indicators of hydrology and/or vegetation during the drier portion of the growing season. Obligate hydrophytes and facultative wetlands plant species are normally dominant during the wetter portion of the growing season. The determination that an area exhibits vernal pool characteristics and the definition of the watershed supporting vernal pool hydrology is made on a case-by-case basis. Such determinations should be considered the length of time the areas exhibit upland and wetland characteristics and the manner in which the area fits into the overall ecological system as a wetland. The seasonal hydrology of vernal pools provides for a unique environment, which supports plants and invertebrates specifically adapted to a regime of winter inundation, followed by an extended period when the pool soils are dry.

Vernal pools are seasonally inundated, ponded areas that only form in regions where specialized soil and climatic conditions exist. During fall and winter rains typical of Mediterranean climates, water collects in shallow depressions where downward percolation of water is prevented by the presence of a hard pan or clay pan layer (duripan) below the soil surface. Later in the spring when rains decrease and the weather warms, the water evaporates, and the pools generally disappear by May. The shallow depressions remain relatively dry until late fall and early winter with the advent of greater precipitation and cooler temperatures. Vernal pools provide unusual "flood and drought" habitat conditions to which certain plant and wildlife species have specifically adapted as well as invertebrate species such as fairy shrimp.

The MSHCP lists two general classes of soils known to be associated with listed and special-status plant species; clay soils and Traver-Domino Willow association soils. The specific clay soils known to be associated with listed and special-status species within the MSHCP plan area include Bosanko, Auld, Altamont, and Porterville series soils, whereas Traver-Domino Willows association includes saline-alkali soils largely located along floodplain areas of the San Jacinto River and Salt Creek.

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5.2.2 Existing Conditions and Results

A review of recent and historic aerial photographs (1966-2022) of the project site did not provide visual evidence of an astatic or vernal pool conditions within the project site. No ponding was observed, further supporting the fact that the drainage patterns currently occurring on the project site do not follow hydrologic regimes needed for vernal pools. From this review of historic aerial photographs and observations during the field investigations, it can be concluded that there is no indication of vernal pools or suitable fairy shrimp habitat occurring within the proposed project site. Therefore, the project is consistent with Section 6.1.2 of the MSHCP.

5.3 Fairy Shrimp

Riverside fairy shrimp (*Streptocephalus woottoni*)

Riverside fairy shrimp are restricted to deep seasonal vernal pools, vernal pool like ephemeral ponds, and stock ponds and other human modified depressions. They prefer warm-water pools that have low to moderate dissolved solids, are less predictable, and remained filled for extended periods of time. Basins that support Riverside fairy shrimp are typically dry a portion of the year, but usually are filled by late fall, winter or spring rains, and may persist through May. Known habitats occur within annual grasslands, which may be interspersed through chaparral or coastal sage scrub vegetation. In Riverside County, Riverside fairy shrimp have been found in pools formed over the following soils: Murrieta stony clay loams, Las Posas series, Wyman clay loam, and Willows soils.

Soils on-site have been mechanically disturbed and heavily compacted from historic land uses (i.e., historic agricultural activities and on-site and surrounding development). Due to the historic use of the site for agricultural purposes and no indicators of water ponding or astatic water conditions, the site was determined not to provide suitable habitat for Riverside fairy shrimp.

Santa Rosa Plateau fairy shrimp (*Linderiella santarosae*)

Santa Rosa Plateau fairy shrimp are restricted to seasonal southern basalt flow vernal pools with cool clear to milky waters that are moderately predictable and remain filled for extended periods of time and are known only from vernal pool on the Santa Rosa Plateau. Since the project site is not located within the known area where Santa Rosa Plateau fairy shrimp have been documented, the site was determined not to provide suitable habitat for Santa Rosa Plateau fairy shrimp.

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Vernal pool fairy shrimp (*Branchinecta lynchi*)

Vernal pool fairy shrimp are restricted to seasonal vernal pools (vernal pools and alkali vernal pools) and prefer cool-water pools that have low to moderate dissolved solids, are unpredictable, and often short lived. The vernal pool fairy shrimp is known from four locations in Western Riverside County MSHCP Plan Area: Skunk Hollow, the Santa Rosa Plateau, Salt Creek, and the vicinity of the Pechanga Indian Reservation. Since the project site is not located within or adjacent to the four know populations, the site was determined not to provide suitable habitat for vernal pool fairy shrimp.

5.4 Riparian Birds

The project site does not support any riparian habitats. Therefore, it was determined that the project site does not have the potential to provide suitable habitat for least Bell's vireo [LBVI; *Vireo bellii pusillus*], southwestern willow flycatcher [SWFL; *Empidonax traillii extimus*], or yellow-billed cuckoo [YBCU; *Coccyzus americanus*]. No further surveys were recommended or required.

5.5 Other Section 6.1.2 Species

The project site does not provide suitable habitat for other species listed in Section 6.1.2. No further review required.

6 PROTECTION OF NARROW ENDEMIC PLANT SPECIES (SECTION 6.1.3)

Section 6.1.3 of the MSHCP, *Protection of Narrow Endemic Plant Species*, states that the MSHCP database does not provide sufficient detail to determine the extent of the presence/distribution of Narrow Endemic Plant Species within the MSHCP Plan Area. Based on the RCA MSHCP Information Map query and review of the MSHCP, it was determined that the project site is located within the designated survey area for the following Narrow Endemic Plant Species:

- Munz's onion (*Allium munzii*), San Diego ambrosia (*Ambrosia pumila*), many-stemmed dudleya (*Dudleya multicaulis*), spreading navarretia (*Navarretia fossallis*), California Orcutt grass (*Orcuttia californica*), and Wright's trichocoronis (*Trichocoronis wrightii* var. *wrightii*).

Ecological Sciences, Inc. conducted Narrow Endemic Plant Species focused surveys on the proposed project site in 2022. Refer to Appendix D, *Focused Criteria Area / Narrow Endemic Plan Species and Western Burrowing Owl Surveys* (Ecological Sciences, 2022).

6.1 Methods

Existing documentation pertinent to the distribution and habitat requirements of Narrow Endemic Plant Species was reviewed and analyzed. This included a review of: (1) the

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California Natural Diversity Data Base (CNDDDB) for the Perris and surrounding USGS 7.5-minute quadrangle maps; (2) Final MSHCP (2003), (3) ELMT Consulting (2021), LSA (2015), Searl Biological Services (2015), and (4) other literature pertaining to habitat requirements of Narrow Endemic Plant Species known from the site vicinity.

Focused Narrow Endemic Plant Species surveys were conducted by Ecological Sciences, Inc. (ESI) on March 8, April 7, April 25, and May 10, 2022, to document plants and vegetation communities present on the site. Field surveys were scheduled (to the degree possible) to coincide with known flowering periods of Narrow Endemic Plant Species and/or during periods of detection (drought conditions may affect seasonal flowering periods). Surveys were conducted by transect surveys throughout the site with a topographic map and color aerial photograph for orientation. Data recorded included weather conditions, habitat quality, vegetation communities, plants species observed, land management practices, surrounding land uses, survey location, and time of day. Weather data were recorded using a digital thermocouple and digital anemometer, and by visual estimation of cloud cover and general weather characteristics. Weather conditions during the March-May 2022 surveys included clear to partly cloudy skies, 1-5 breezes, and ambient air temperatures of 68-85 °F.

6.2 Existing Conditions and Results

The subject study area is generally characterized as a flat, historically disturbed site that has been exposed to some form of anthropogenic disturbance either through discing, mowing, or other forms of disturbances associated with vehicular and pedestrian traffic. The project site primarily supports one distinct habitat type: dense non-native grassland. In addition, the site supports disturbed areas located in the northeast corner and along the eastern boundary of the site. Large soil debris piles are also present in this area. Several barren alkali areas are present on site, but no evidence of ponded or flowing water was observed. Due to existing land uses, no native plant communities or natural communities of special concern were observed on site. Surrounding land use includes a paintball facility to the east, industrial to the west, ongoing construction to the north, and vacant land to the south.

The subject site has been used for agriculture since as early as 1938. An area of unknown deposited soil, approximately 200 feet by 200 feet and ranging in height by approximately 2 to 5 feet, was observed at the northeastern corner of the subject property in March 2022. Based on a review of historical photographs available on Google Earth, the soil appeared to be deposited between 2003 and 2006. Given the lack of information regarding its content and unknown origin, Haley Aldrich (2020) proposed to sample and analyze the unknown deposited soil. Upon testing the unknown deposited soil, arsenic was detected at a concentration greater than the published DTSC background

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concentration threshold. Based on the information obtained and the detection of elevated arsenic concentrations within the unknown deposited soil, Haley Aldrich recommended that this soil be removed from the site and disposed of at an appropriately regulated landfill. The contamination of soil on the eastern border of the subject site may have permanently altered the habitat and/or microhabitat conditions (Haley & Aldrich, Inc. 2022).

No Narrow Endemic Plant Species were recorded on site during the March-May 2022 focused surveys. Suitable habitat for Munz's onion is described as mesic exposures or seasonally moist microsites in grassy openings in coastal sage scrub, chaparral, juniper woodland, valley and foothill grasslands in clay soils (e.g., Altamont, Auld, Bosanko, Claypit, and Porterville series). These soil types and habitats are absent from the site and as such, this species would not be expected to occur. The site does not support open floodplain terraces, sparse non-native grasslands or ruderal habitats in association with river terraces, vernal pools, and/or alkali playas, and as such, the San Diego ambrosia is not expected to occur. Many-stemmed dudleya is associated with openings in chaparral, coastal sage scrub, and grasslands underlain by clay and cobbly clay soils within the Altamont, Auld, Bosanko, Claypit, and Porterville series. These conditions are absent from the site and as such, this species would not be expected to occur. Suitable habitat for spreading navarretia is limited to vernal pools, depressions, and ditches in association with alkali (Willows and Traver) soils; Willow soils are present on site but are highly disturbed (low occurrence potential). California Orcutt grass is primarily restricted to the southern basaltic claypan vernal pools in association with clay or alkali soils (Domino, Willows and Traver). Domino and Willows soils are mapped on site, but the surface is highly disturbed from anthropogenic activities (low occurrence potential). Similarly, habitat suitable for Wright's trichocoronis is primarily restricted to the alkali floodplains (seasonal wetlands) of the San Jacinto River in association with Willows, Domino and Traver soils. Although Domino and Willow soil types are present, this taxon is not expected to occur. Exposure to various and recurring anthropogenic disturbances has likely altered soil chemistry and other substrate characteristics resulting in the absence of habitat and/or microhabitat conditions in 2022 most often associated with the selected Narrow Endemic Plant Species. Accordingly, no Narrow Endemic Plant Species are currently expected to occur within the study area.

Recurring and long-standing anthropogenic surface disturbances such as discing, debris dumping, vehicles, and weed abatement may have rendered the site currently unsuitable for these species. In the 2005 LSA Report, spreading navarretia (Federal Threatened), San Jacinto Valley Crownscale (Federal Endangered), and smooth tarplant (MSHCP) were recorded approximately 1.2 miles south of the site, but were not recorded directly

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on site. Historical records (CNDDDB) for these species are also known from the site vicinity, but land use changes have significantly changed the historic landscape of the region.

Although no Narrow Endemic Plant Species were recorded directly on site, several protected plant species were recorded on an adjacent offsite parcel in 2015 (generally referred to as the paintball site) by Searl Biological Services (Western Riverside County MSHCP Compliance Document, July 1). This site is located to the east and south of the study area. The southern extent of the adjacent site is the San Jacinto River. These offsite species included smooth tarplant (CRPR 1B.1; not CESA or FESA listed), paniculate tarplant (not covered by the WRMSHCP; CRPR 4.2; CNPS plant), and San Jacinto Valley crowscale (FE, CRPR 1B.1; not CESA listed). Microhabitat conditions may be unsuitable on site despite the close proximity to known locations. No focused plant surveys were conducted off site as part of this survey effort conducted in 2022.

Survey Results

Narrow Endemic Plant Species	2022 Focused Survey Results
Munz's onion	Was not observed
San Diego ambrosia	Was not observed
many-stemmed dudleya	Was not observed
spreading navarretia	Was not observed
California Orcutt grass	Was not observed
Wright's trichocoronis	Was not observed

6.3 Impacts

None of the Narrow Endemic Plant Species were observed onsite during the 2022 focused surveys. As a result, no impacts to Narrow Endemic Plant Species are expected to occur from site development.

7 ADDITIONAL SURVEY NEEDS AND PROCEDURES (SECTION 6.3.2)

7.1 Criteria Area Plant Species

Based on the RCA MSHCP Information Map query and review of the MSHCP, it was determined that the project site is located within the designated survey area for the following Criteria Area Plant Species:

- San Jacinto Valley crowscale (*Atriplex coronate* var. *notatior*), Parish's brittlescale (*Atriplex parishii*), Davidson's saltscale (*Atriplex serenana* var. *davidsonii*), thread-leaved brodiaea (*Brodiaea filifolia*), round-leaved filaree (*California macrophylla*), smooth tarplant (*Centromadia pungens* ssp. *laevis*),

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Coulter's goldfield (*Lasthenia glabrata ssp. coulteri*), little mousetail (*Myosurus minimus*), and mud nama (*Nama stenocarpa*).

Ecological Sciences, Inc. conducted Criteria Area Plant Species focused surveys for the proposed project in 2022. Refer to Appendix D, *Focused Criteria Area / Narrow Endemic Plant Species and Western Burrowing Owl Surveys* (Ecological Sciences, 2022).

7.1.1 Methods

Existing documentation pertinent to the distribution and habitat requirements of the Criteria Area Plant Species was reviewed and analyzed. This included a review of: (1) the California Natural Diversity Data Base (CNDDDB) for the Perris and surrounding USGS 7.5-minute quadrangle maps; (2) Final MSHCP (2003), (3) ELMT Consulting (2021), LSA (2015), Searl Biological Services (2015), and (4) other literature pertaining to habitat requirements of Criteria Area Plant Species known from the site vicinity.

Focused Criteria Area Plant Species surveys were conducted by ESI on March 8, April 7, April 25, and May 10, 2022, to document plants and vegetation communities present on the site. Field surveys were scheduled (to the degree possible) to coincide with known flowering periods of Criteria Area Plant Species and/or during periods of detection (drought conditions may affect seasonal flowering periods). Surveys were conducted by transect surveys throughout the site with a topographic map and color aerial photograph for orientation. Data recorded included weather conditions, habitat quality, vegetation communities, plants species observed, land management practices, surrounding land uses, survey location, and time of day. Weather data were recorded using a digital thermocouple and digital anemometer, and by visual estimation of cloud cover and general weather characteristics. Weather conditions during the March-May 2022 surveys included clear to partly cloudy skies, 1-5 breezes, and ambient air temperatures of 68-85 °F.

7.1.2 Existing Conditions and Results

The subject study area is generally characterized as a flat, historically disturbed site that has been exposed to some form of anthropogenic disturbance either through discing, mowing, or other forms of disturbances associated with vehicular and pedestrian traffic. The project site primarily supports one distinct habitat type: dense non-native grassland. In addition, the site supports disturbed areas located in the northeast corner and along the eastern boundary of the site. Large soil debris piles are also present in this area. Several barren alkali areas are present on site, but no evidence of ponded or flowing water was observed. Due to existing land uses, no native plant communities or natural communities of special concern were observed on site. Surrounding land use includes a

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paintball facility to the east, industrial to the west, ongoing construction to the north, and vacant land to the south.

The subject site has been used for agriculture since as early as 1938. An area of unknown deposited soil, approximately 200 feet by 200 feet and ranging in height by approximately 2 to 5 feet, was observed at the northeastern corner of the subject property in March 2022. Based on a review of historical photographs available on Google Earth, the soil appeared to be deposited between 2003 and 2006. Given the lack of information regarding its content and unknown origin, Haley Aldrich (2020) proposed to sample and analyze the unknown deposited soil. Upon testing the unknown deposited soil, arsenic was detected at a concentration greater than the published DTSC background concentration threshold. Based on the information obtained and the detection of elevated arsenic concentrations within the unknown deposited soil, Haley Aldrich recommended that this soil be removed from the site and disposed of at an appropriately regulated landfill. The contamination of soil on the eastern border of the subject site may have permanently altered the habitat and/or microhabitat conditions (Haley & Aldrich, Inc. 2022).

No Criteria Area Plant Species were recorded on site during the March-May 2022 focused surveys. Suitable habitat associated with San Jacinto Valley crownscale include alkali flats and playas. These conditions are not present on site due to long-standing surface disturbances (low occurrence potential). Parish's brittlescale is associated with alkali meadows, chenopod scrub, and playas which are not present (low occurrence potential). Davidson's saltscale occurs on coastal bluff scrub and in coastal scrub under alkaline conditions which are entirely absent on site (low occurrence potential). Thread-leaved brodiaea occurs in vernal pools, scrub, woodlands, and grasslands with clay soils that are not present on site (low occurrence potential). Smooth tarplant is associated with alkaline grasslands and meadows, playas, and scrub habitats. Although alkaline soils are present, this species was not recorded on site (moderate occurrence potential). Round-leaved filaree occurs in cismontane woodland, valley and foothill grasslands with clay soils. None of the conditions occur on site (low occurrence potential). Coulter's goldfields occur on playas and vernal pools that are not present (low occurrence potential). Little mousetail requires vernal pools which were not recorded on site (low occurrence potential). Mud nama requires marshes and swamps, lake margins, and riverbanks that are entirely absent from the site (low occurrence potential). Exposure to various and recurring anthropogenic disturbances has likely altered soil chemistry and other substrate characteristics resulting in the absence of habitat and/or microhabitat conditions in 2022 most often associated with the selected Criteria Area Plant Species. No vernal pools or vernal pool habitat was observed on the project site. However, the project site is underlain by Domino and Willows soil associations that are identified in the MSHCP as having the

MSHCP Consistency Analysis

potential to provide suitable habitat for Criteria Area Plant Species. No Criteria Area Plant Species are currently expected to occur within the study area.

Recurring and long-standing anthropogenic surface disturbances such as discing, debris dumping, vehicles, and weed abatement may have rendered the site currently unsuitable for these species. In the 2005 LSA Report, spreading navarretia (Federal Threatened), San Jacinto Valley Crownscale (Federal Endangered), and smooth tarplant (MSHCP) were recorded approximately 1.2 miles south of the site, but were not recorded directly on site. Historical records (CNDDDB) for these species are also known from the site vicinity, but land use changes have significantly changed the historic landscape of the region.

Although no Criteria Area Plant Species were recorded directly on site, several protected plant species were recorded on an adjacent offsite parcel in 2015 (generally referred to as the paintball site) by Searl Biological Services (Western Riverside County MSHCP Compliance Document, July 1). This site is located to the east and south of the study area. The southern extent of the adjacent site is the San Jacinto River. These offsite species included smooth tarplant (CRPR 1B.1; not CESA or FESA listed), paniculate tarplant (not covered by the WRMSHCP; CRPR 4.2; CNPS plant), and San Jacinto Valley crownscale (FE, CRPR 1B.1; not CESA listed). Microhabitat conditions may be unsuitable on site despite the close proximity to known locations. No focused plant surveys were conducted off site as part of this survey effort conducted in 2022.

Survey Results

Narrow Endemic Plant Species	2022 Focused Survey Results
San Jacinto Valley crownscale	Was not observed
Parish's brittlescale	Was not observed
Davidson's saltscale	Was not observed
Thread-leaved brodiaea	Was not observed
round-leaved filaree	Was not observed
smooth tarplant	Was not observed
Coulter's goldfield	Was not observed
little mousetail	Was not observed
mud nama	Was not observed

7.1.3 Impacts

None of the Criteria Area Plant Species were observed onsite during the 2022 focused surveys. As a result, no impacts to Criteria Area Plant Species are expected to occur from site development.

MSHCP Consistency Analysis

7.2 Amphibians

The project site is not located within an amphibian survey area. Further, the project site does not provide suitable habitat for amphibian species.

7.3 Burrowing Owl

Based on the RCA MSHCP Information Map query and review of the MSHCP, it was determined that the project site is located within the designated survey area for burrowing owl. Ecological Sciences, Inc. conducted burrowing owl focused surveys for the proposed project in 2022. Refer to Appendix D, *Focused Criteria Area / Narrow Endemic Plan Species and Western Burrowing Owl Surveys* (Ecological Sciences, 2022).

7.3.1 Methods

Existing documentation pertinent to the distribution and habitat requirements of the BUOW was reviewed and analyzed. This included a review of: (1) the California Natural Diversity Data Base (CNDDDB) for the Perris and surrounding USGS 7.5-minute quadrangle maps; (2) Final MSHCP (2003), (3) ELMT Consulting (2021), LSA (2015), Searl Biological Services (2015), and (4) other literature pertaining to habitat requirements of BUOW known from the site vicinity.

A systematic survey for burrows and breeding season BUOW surveys (n=4) were conducted April 6, 7, 8, and 9, 2022 due to the presence of potentially suitable habitat. Focused surveys were conducted in accordance with current MSHCP guidelines (3-31-06). Accordingly, a series of 4 morning (one hour before sunrise to two hours after sunrise) or evening (two hours before sunset to one hour after sunset) surveys were conducted.

Pursuant to survey protocol, surveyors initially used binoculars to scan all suitable habitat/potential refugia prior to the start of pedestrian surveys. Habitat characteristics noted during the surveys included the presence of small mammal burrows, percentage of vegetative cover, on-site and surrounding land use, potential burrow sites with good horizontal visibility, and soil conditions. Weather data were recorded using a digital thermocouple and digital anemometer, and by visual estimation of cloud cover and general weather characteristics. Following the initial site scan, a systematic survey for burrows, burrowing owls, and owl sign was conducted by walking through suitable habitat over the entire survey area (i.e., the project site and at least visually with binoculars within 150 meters off site). To the extent possible, pedestrian survey transects were spaced to allow 100 percent visual coverage of the ground surface. The distance between transect center lines was no more than 30 meters (± 100 feet) and were reduced to account for differences in terrain, vegetation density, and ground surface visibility (where necessary).

MSHCP Consistency Analysis

Potentially suitable burrows were examined for sign of BUOW use such as the presence of owl pellets, prey remains, or feathers at potential burrow entrances. Burrows were inspected with the aid of a mirror to better view burrow interiors. Weather conditions during the April 6-9, 2022, surveys included 10-70 percent cloud cover, winds between 1-6 mph, and ambient air temperatures of 68-84 °F. No rainfall was recorded within 5 days of the surveys.

7.3.2 Existing Conditions and Results

The subject study area is generally characterized as a flat, historically disturbed site that has been exposed to some form of anthropogenic disturbance either through discing, mowing, or other forms of disturbances associated with vehicular and pedestrian traffic. The project site primarily supports one distinct habitat type: dense non-native grassland. In addition, the site supports disturbed areas located in the northeast corner and along the eastern boundary of the site. Large soil debris piles are also present in this area. Several barren alkali areas are present on site, but no evidence of ponded or flowing water was observed. Due to existing land uses, no native plant communities or natural communities of special concern were observed on site. Surrounding land use includes a paintball facility to the east, industrial to the west, ongoing construction to the north, and vacant land to the south.

The subject site has been used for agriculture since as early as 1938. An area of unknown deposited soil, approximately 200 feet by 200 feet and ranging in height by approximately 2 to 5 feet, was observed at the northeastern corner of the subject property in March 2022. Based on a review of historical photographs available on Google Earth, the soil appeared to be deposited between 2003 and 2006. Given the lack of information regarding its content and unknown origin, Haley Aldrich (2020) proposed to sample and analyze the unknown deposited soil. Upon testing the unknown deposited soil, arsenic was detected at a concentration greater than the published DTSC background concentration threshold. Based on the information obtained and the detection of elevated arsenic concentrations within the unknown deposited soil, Haley Aldrich recommended that this soil be removed from the site and disposed of at an appropriately regulated landfill. The contamination of soil on the eastern border of the subject site may have permanently altered the habitat and/or microhabitat conditions (Haley & Aldrich, Inc. 2022).

No direct BUOW observations or sign (feathers, pellets, fecal material, prey remains, etc.) were recorded during the April 2022 focused surveys. Birds observed generally included those species that are accustomed to nearby human presence such as those indicated in Appendix B. Scarce potential nesting refugia (e.g., small mammal burrows) is scattered throughout the site (primarily along peripheral areas and in soil debris piles along the

MSHCP Consistency Analysis

northern boundary). Nonetheless, the site (and surrounding areas not developed) support potentially suitable BUOW nesting/foraging habitat (moderate occurrence potential). None of the burrows/refugia inspected during the April 2022 surveys were determined to be currently occupied or recently used by BUOW based on the lack of owl observations and absence of sign around burrow entrances. Surveys of the site and scanning adjacent areas during peak BUOW activity times did not reveal any indication that this species was currently present or utilizing the site for foraging purposes. Nonetheless, potential nesting and foraging habitat for BUOW is present on and adjacent to the site and the subject site could be occupied by BUOW at any time of the year. This taxon is well known to occur in the site vicinity. Due the presence of suitable BUOW habitat and the potential for this taxon to occur, preconstruction surveys (at a minimum), would be required prior to any development activities. If BUOW were recorded during any subsequent site surveys, their presence would impose some degree of constraint (e.g., compliance with MSHCP, CDFW, MBTA) to development depending upon the nature and extent of potential impacts [e.g., number of BUOW pair(s)] and the seasonal timing of proposed construction activities. If it were later determined that active nests would be lost as a result of site-preparation, it would be in conflict with MSHCP species-specific conservation objectives.

7.3.3 Impacts

Based on the results of the 2022 burrowing owl focused surveys, no burrowing owls or evidence of recent or historic use by burrowing owls were observed on the project site. As a result, burrowing owls are presumed to be absent from the project site, and no impacts are expected to occur.

7.3.4 Mitigation

Due to the presence of potentially suitable habitat, a 30-day pre-construction survey for burrowing owls is required prior to initial ground-disturbing activities (including vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the Regional Conservation Authority (RCA) and the Wildlife Agencies, and will need to coordinate further with RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary.

MSHCP Consistency Analysis

Following submittal, review and approval of the 30-day burrowing owl preconstruction survey report by the County of Riverside and compliance with all species-specific conservation goals, if detected within or adjacent to the Project Site, the project will be consistent with MSHCP Section 6.3.2.

7.4 Mammals

Based on the RCA MSHCP Information Map query and review of the MSHCP, it was determined that the project site is not located within any designated survey areas for mammalian species. Therefore, an analysis for suitability for covered mammalian species is not required.

8 INFORMATION ON OTHER SPECIES

8.1 Delhi Sands Flower Loving Fly

The project site is not located within or adjacent to mapped Delhi sand soils. Therefore, an analysis for Delhi sands flower-loving fly is not required.

8.2 Species Not Adequately Conserved

None of the MSHCP Table 9-3 species (28 species) were observed on the site, and no impacts to the 28 species are expected to occur.

9 GUIDELINES PERTAINING TO THE URBAN/WILDLANDS INTERFACE (SECTION 6.1.4)

According to Section 6.1.4 the MSHCP, *Guidelines Pertaining to Urban/Wildlands Interface*, the guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area (MSHCP, p 6-42). The proposed project site is located within Criteria Cell 3276, which contributes to the assembly of Proposed Constrained Linkage 19. The Urban/Wildlife Interface Guidelines, as discussed below, will be incorporated into the project to ensure that indirect project-related impacts, including drainage, toxics, lighting, noise, invasive plant species, barriers, and grading/land development, are avoided or minimized.

Drainage

The project's stormwater should be directed to a stormwater basin located on the project site. The basin shall be designed in accordance with all federal, state, regional, and local standards and regulations concerning water quality. These measures will assure that the project stormwater discharges are no greater in volume and velocity than current undeveloped conditions and that the water leaving the site complies with all applicable water quality standards.

MSHCP Consistency Analysis

Toxics

According to the MSHCP, measures shall be incorporated to ensure that application of chemicals does not result in discharge to the MSHCP Conservation Area. During the construction of the project, construction activities have the potential to cause release of toxics that could impact the MSHCP Conservation Area. To address these potential short-term impacts, the project is required to stage construction operations as far away from the MSHCP Conservation Area to the maximum extent feasible. These mitigation measures will be imposed by the County.

Lighting

The proposed project is not anticipated to significantly increase lighting and glare. However, light sources should be designed with internal baffles to direct the lighting towards the ground and the developed areas and have a zero-side angle cut off to the horizon. Parking lot area lighting for the proposed project will utilize energy-efficient LED shielded fixtures with energy savings control options and occupancy sensing units. In addition, the proposed project's landscape design incorporates use of shrubs and trees to reduce off-site light and glare. All lighting will be consistent with County of Riverside's Light Pollution Ordinance.

Noise

Construction-related noise will be mitigated to be consistent with the County of Riverside's Noise Ordinances by limiting construction activities to daytime hours and requiring construction equipment to be tuned and equipped with mufflers. Under the MSHCP, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed noise standards.

Invasive Plant Species

Plant species acceptable for the project's landscaping must not be considered an invasive species pursuant to Table 6.2 of the MSHCP. To ensure this, the final landscape plans must be reviewed and verified by the County for consistency with the plant species list in Table 6.2 of the MSHCP. Allowable use of invasive species on project sites is based on the proximity of the plantings to the Conservation Area (in this case, the willow forest plant community or its associated drainage), the sensitivity of resources in the Conservation Area to invasion, and barriers to plant and seed dispersal. If the site is sufficiently contained such that invasive plantings would not be able to spread outside of the developed project footprint, invasive plantings may be allowed on the site. However, the County of Riverside will make the final decision on the suitability of this species for the

MSHCP Consistency Analysis

project's landscape plan. The proposed plant palette features drought tolerant plants in conformance with County standards.

Barriers

Barriers would restrict direct access to the MSHCP Conservation Area from the project site by unauthorized public access or domestic animals. Under the MSHCP, suitable barriers include native landscaping, rocks/boulders, fencing, walls, signage, and/or other appropriate mechanisms. The barriers would and should be placed within the boundaries of the development and will be outside of the confines of the open space/MSHCP Conservation Area. The proposed building will be separated from the conservation area by fencing and landscaping along the perimeter of the project site. Additionally, the stormwater outflow will have a perimeter fence that will not restrict any flows out of the basin. The County EPD and RCA will review and approve a final fencing plan.

Grading/Land Development

Manufactured slopes associated with proposed site development shall not extend into the MSHCP Conservation Area. No manufactured slopes are anticipated to be constructed within the MSHCP Conservation Area. Should manufactured slopes be necessary, they will be kept within the boundaries of the development footprint and not encroach into the open space/MSHCP Conservation Area or otherwise into the area of targeted conservation.

10 BEST MANAGEMENT PRACTICES (VOLUME I, APPENDIX C)

The following Best Management Practices, as described in Volume I, Appendix C of the MSHCP, shall be incorporated into the project Conditions of Approval:

1. A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.
2. Water pollution and erosion control plans shall be developed and implemented in accordance with Regional Water Quality Control Board requirements.

MSHCP Consistency Analysis

3. The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.
4. Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials shall be reported to appropriate entities and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.
5. Erodible fill material shall not be deposited into water courses. Brush, loose soils, or other similar debris material shall not be stockpiled within the stream channel or on its banks.
6. The qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint.
7. The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species.
8. Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible.
9. To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).
10. Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.
11. The Permittee shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project approval conditions including these BMPs.

MSHCP Consistency Analysis

11 REFERENCES

- California Burrowing Owl Consortium, 1993. *Burrowing Owl Survey Protocol and Mitigation Guidelines*. Accessed on the internet at:
www.dfg.ca.gov/wildlife/nongame/docs/boconsortium.pdf
- California Department of Fish and Wildlife (CDFW). 2022. RareFind 5, California Natural Diversity Data Base, California. Data Base report on threatened, endangered, rare or otherwise sensitive species and communities for the Perris 7.5-minute USGS quadrangle.
- California Department of Fish and Wildlife (CDFW), 2012. *Staff Report on Burrowing Owl Mitigation*.
- Coulombe, H.N. 1971. *Behavior and population ecology of the burrowing owl (Speotyto cunicularia) in the Imperial Valley of California*. Condor 73: 162-176.
- Ecological Sciences, Inc. 2022. Focused Criteria Area / Narrow Endemic Plant Species and Western Burrowing Owl Surveys Report for the Proposed Ellis Avenue Project. Riverside County, California.
- ELMT Consulting. 2022. Special-Status Plant Survey Report for the Proposed Ellis Avenue and Dawson Road Project. Riverside County, California.
- Environmental Programs Department. (2006, March 29). *Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area*. <http://www.wrc-rca.org/mshcp-species-survey-protocols/>
- Haug, E.A., B.A. Millsap, and M.S. Martell. 1993. *Burrowing Owl (Speotyto cunicularia)*. In: A. Poole and F. Gill, editors, *Birds of North America*, No. 61. Philadelphia: The Academy of Natural Science; Washington DC: The American Ornithologists' Union.
- Ramsen, Jr., J.V. 1978. *Bird Species of Special Concern in California*. Non-game Wildlife Investigations. Wildlife Management Branch Administrative Report No78-1. Report prepared for California Department of Fish and Game.

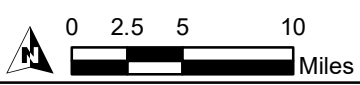
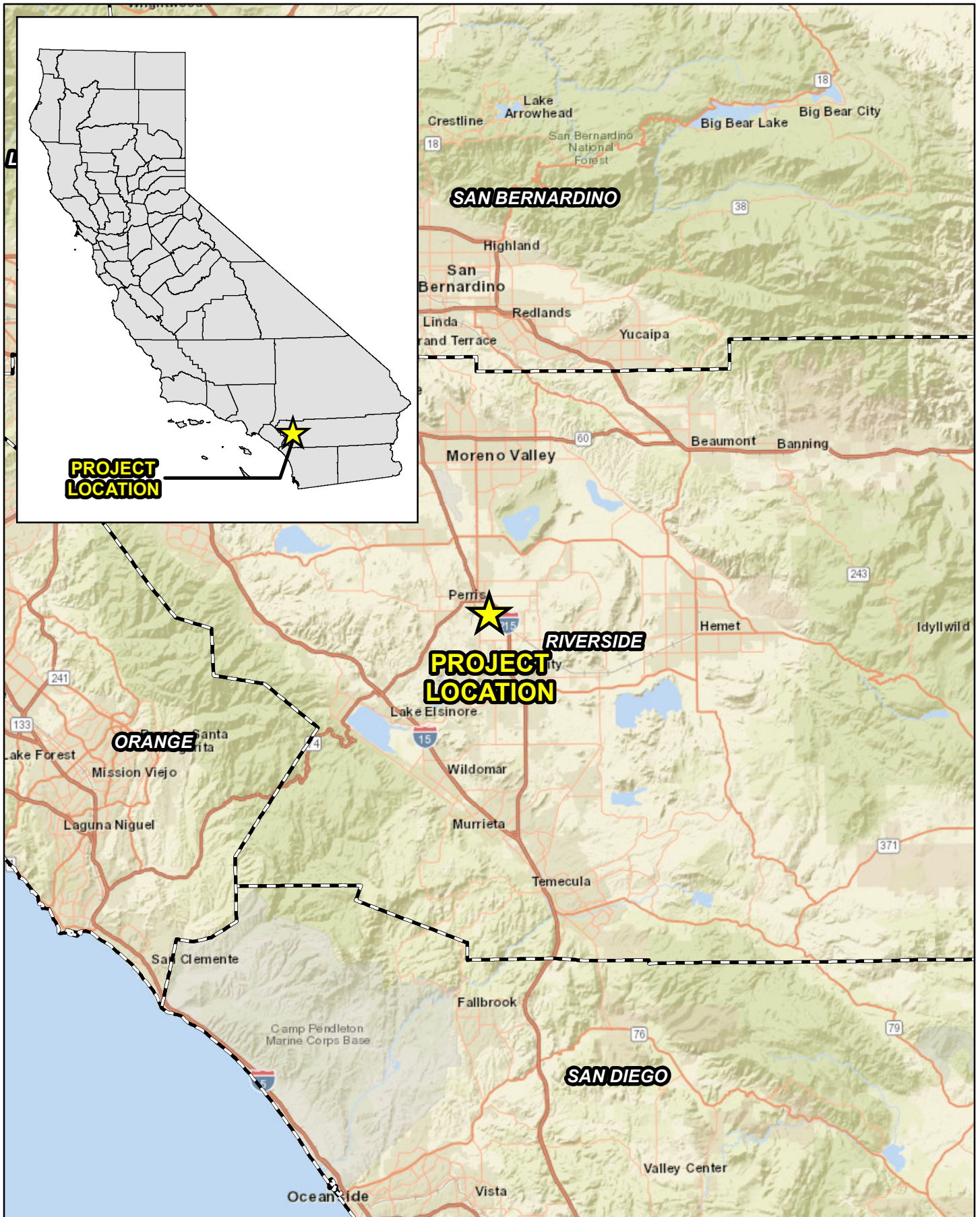
MSHCP Consistency Analysis

USFWS (United States Fish and Wildlife Service). 2000. *Southwestern Willow Flycatcher Protocol Revision 2000*. Sacramento, California: USFWS. <https://www.fws.gov/pacific/ecoservices/endangered/recovery/documents/SWWFlycatcher.2000.protocol.pdf>

USFWS. 2001. *Least Bell's Vireo Survey Guidelines*. January 19, 2001. Sacramento, California: USFWS. https://www.fws.gov/cno/es/Recovery_Permitting/birds/least_bells_vireo/LeastBellsVireo_SurveyGuidelines_20010119.pdf

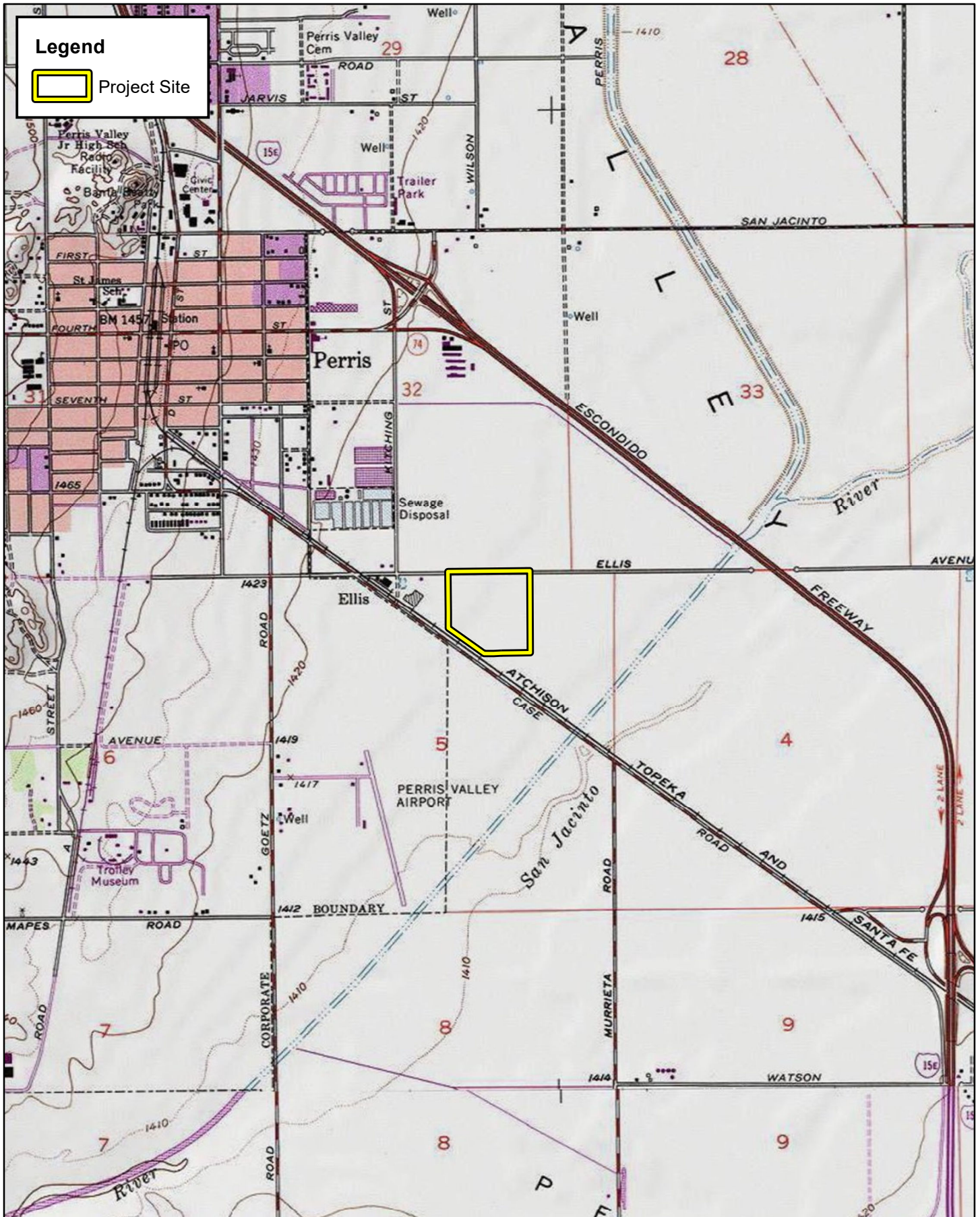
USFWS. 2015. *A Natural History Summary and Survey Protocol for the Western Distinct Population Segment of the Yellow-Billed Cuckoo*. Prepared by M. Halterman, M.J. Johnson, J.A. Holmes, and S.A. Laymon. Sacramento, California: USFWS. April 2015. https://www.fws.gov/southwest/es/Documents/R2ES/YBCU_SurveyProtocol_FINAL_DRAFT_22Apr2015.pdf

Appendix A Project Exhibits



Source: World Street Map, Riverside County

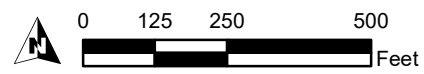
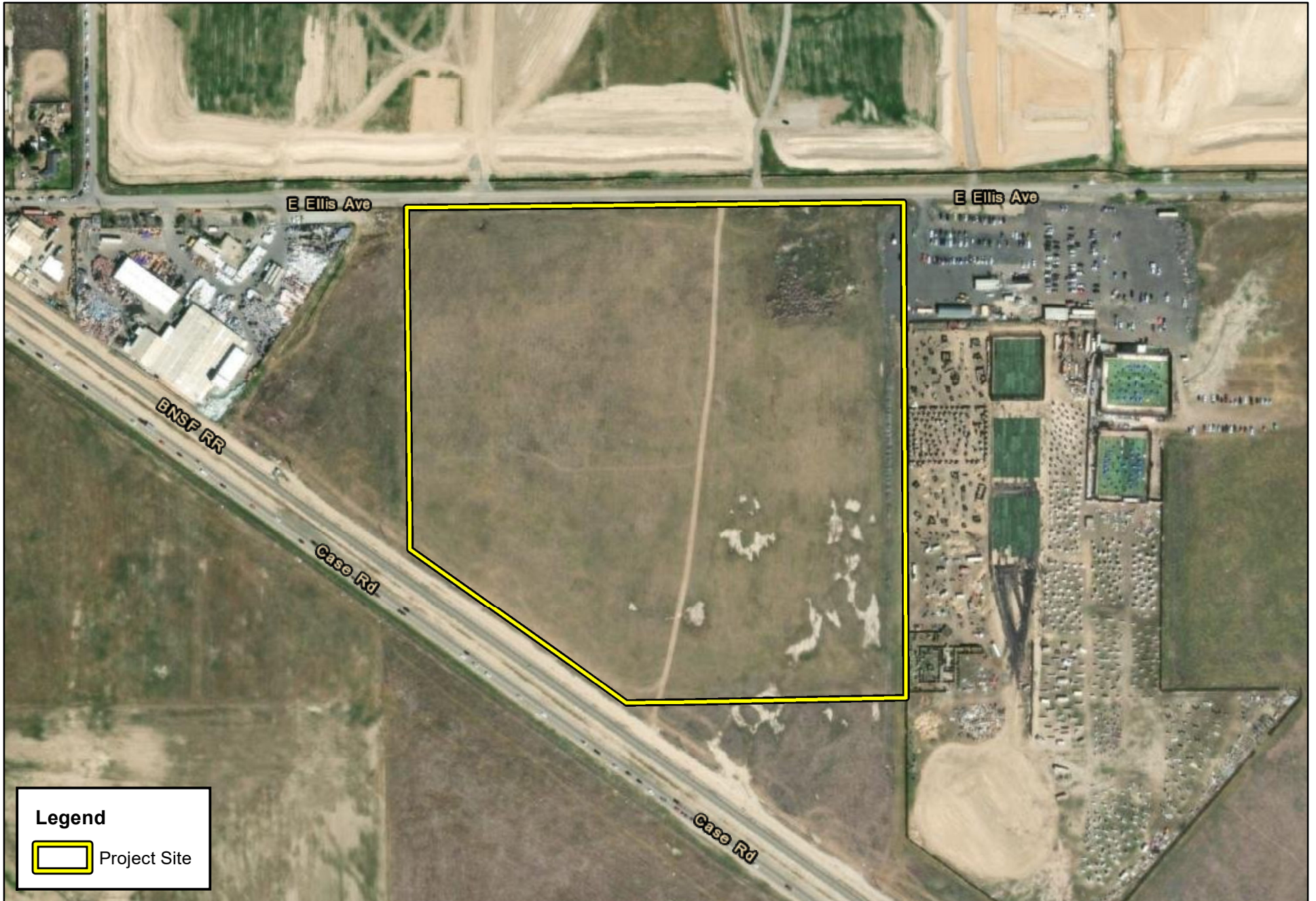
SOUTH PERRIS INDUSTRIAL
MSHCP CONSISTENCY ANALYSIS
Regional Vicinity



SOUTH PERRIS INDUSTRIAL
 MSHCP CONSISTENCY ANALYSIS
Site Vicinity



Source: USA Topographic Map, Riverside County

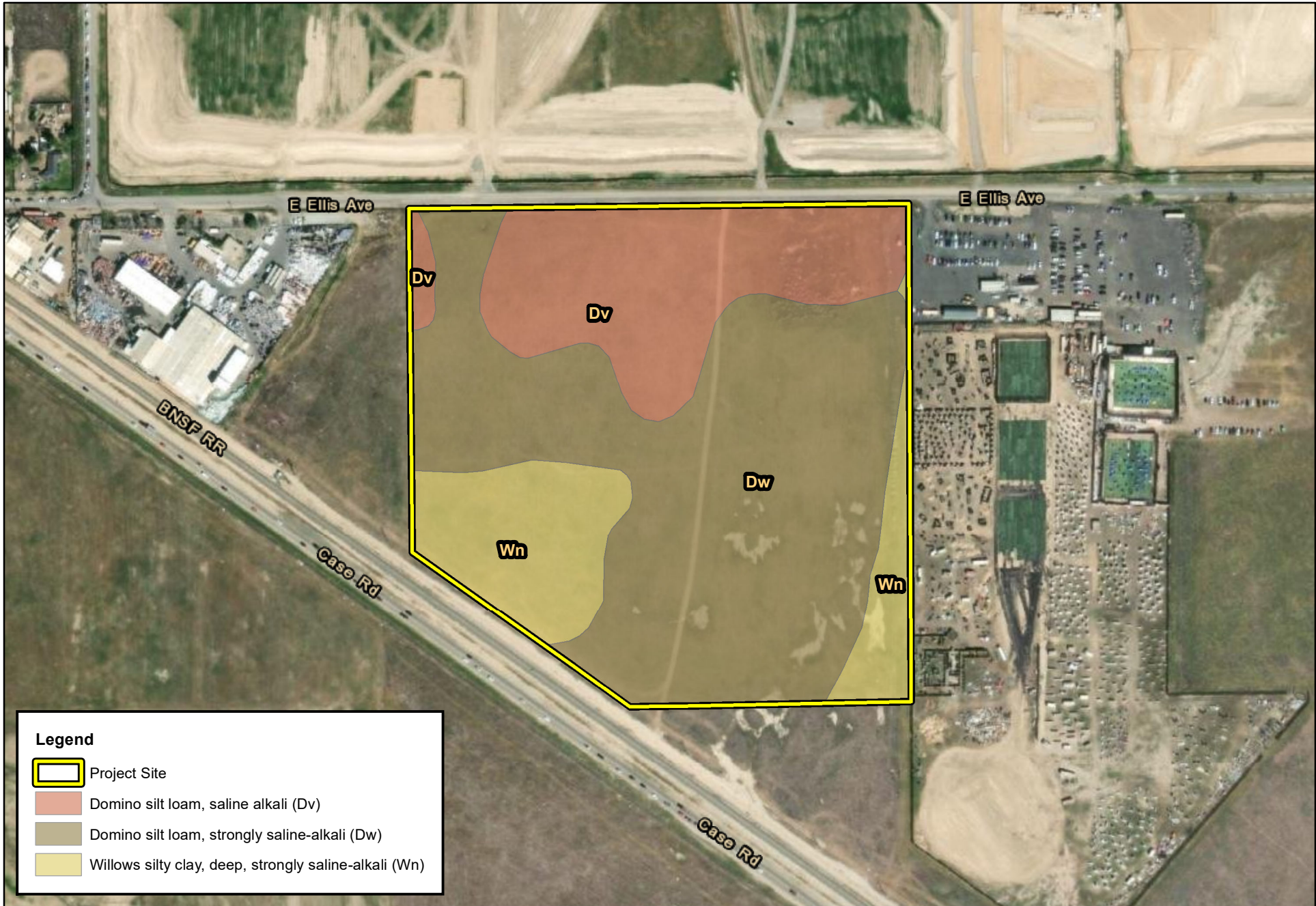


Source: ESRI Aerial Imagery, Riverside County

SOUTH PERRIS INDUSTRIAL
MSHCP CONSISTENCY ANALYSIS

Project Site

Exhibit 3



Legend

- Project Site
- Domino silt loam, saline alkali (Dv)
- Domino silt loam, strongly saline-alkali (Dw)
- Willows silty clay, deep, strongly saline-alkali (Wn)

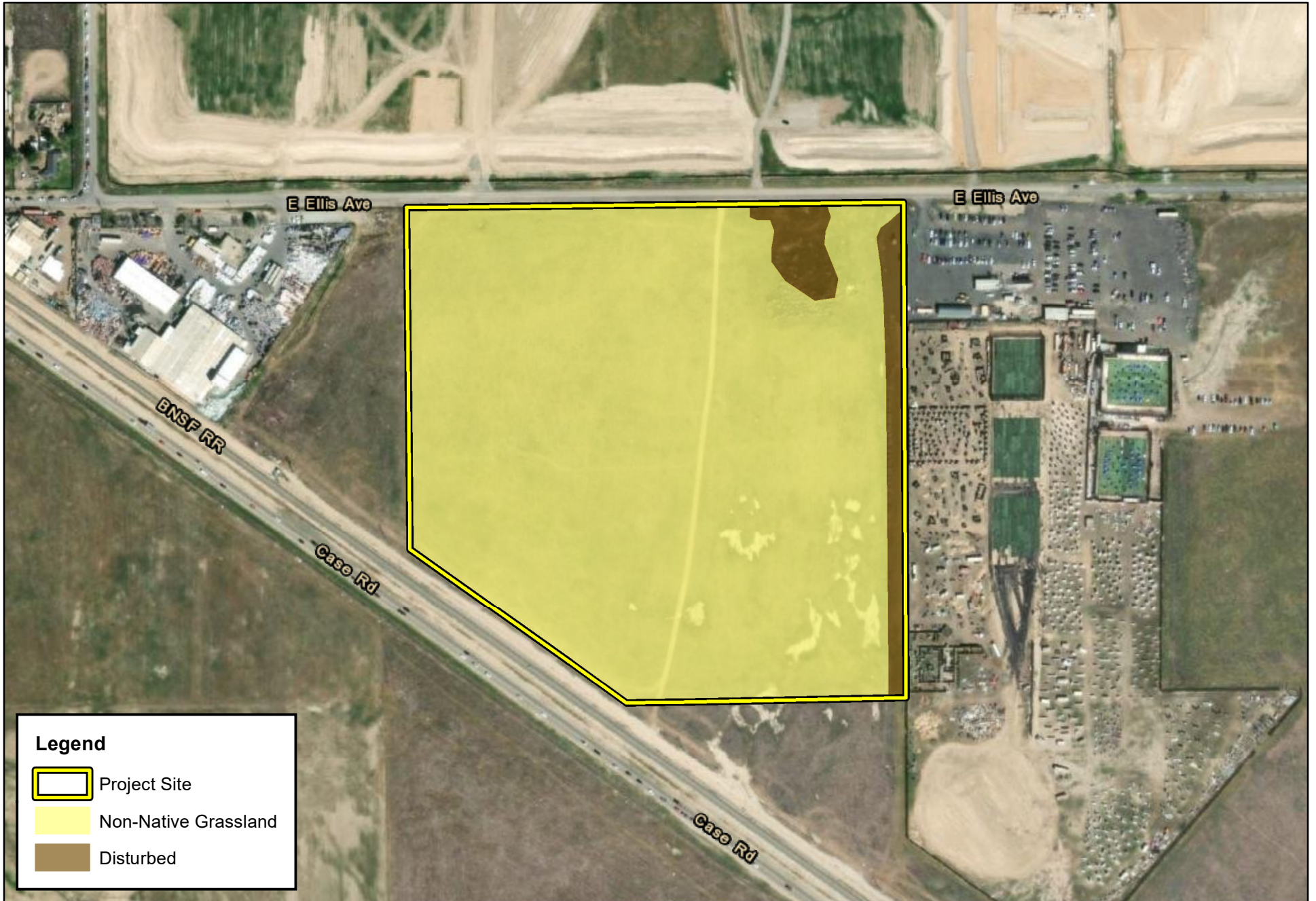


Source: ESRI Aerial Imagery, Soil Survey Geographic Database, Riverside County




SOUTH PERRIS INDUSTRIAL
MSHCP CONSISTENCY ANALYSIS



Soils

Exhibit 4



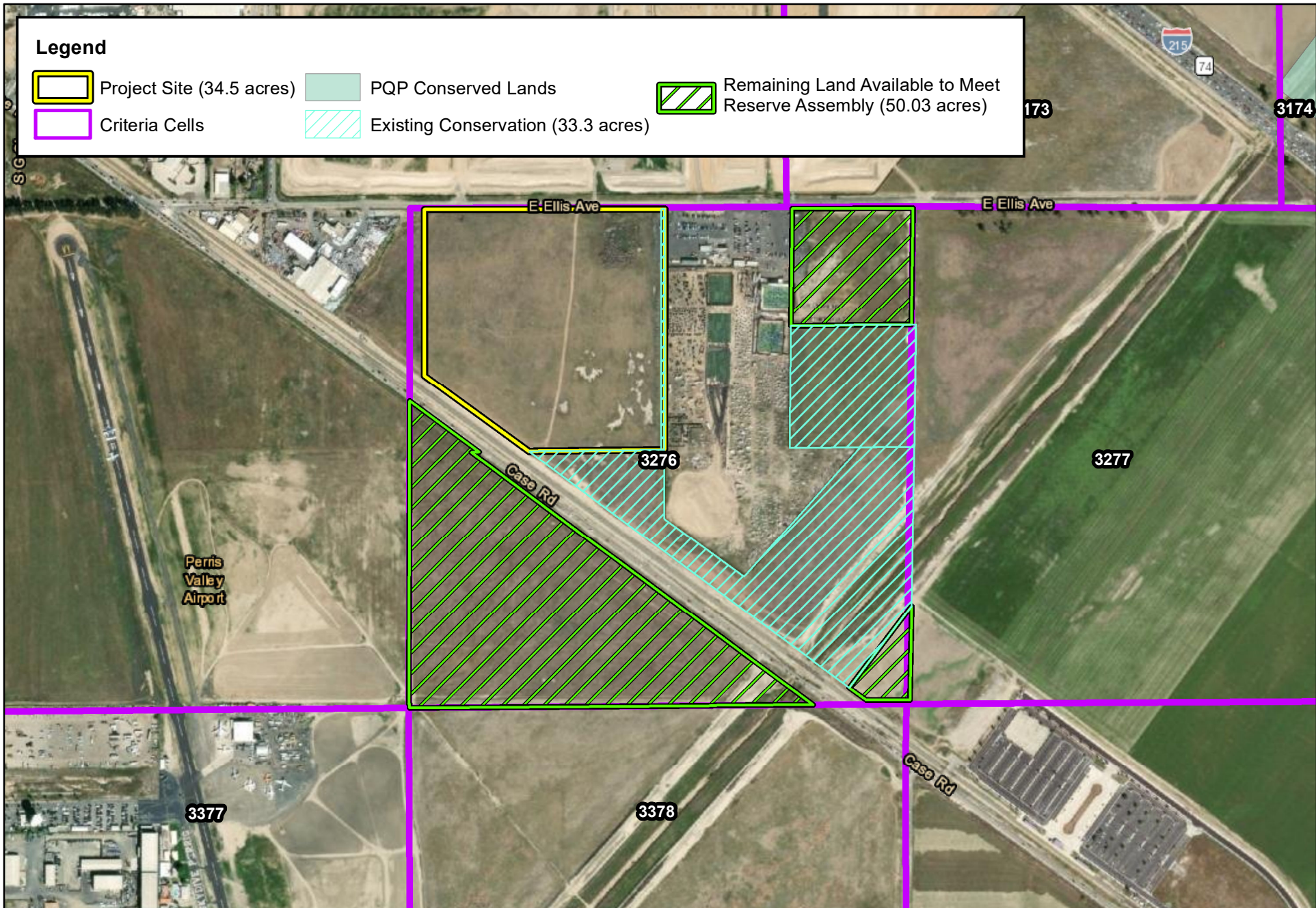
Legend

-  Project Site
-  Non-Native Grassland
-  Disturbed

  0 125 250 500 Feet

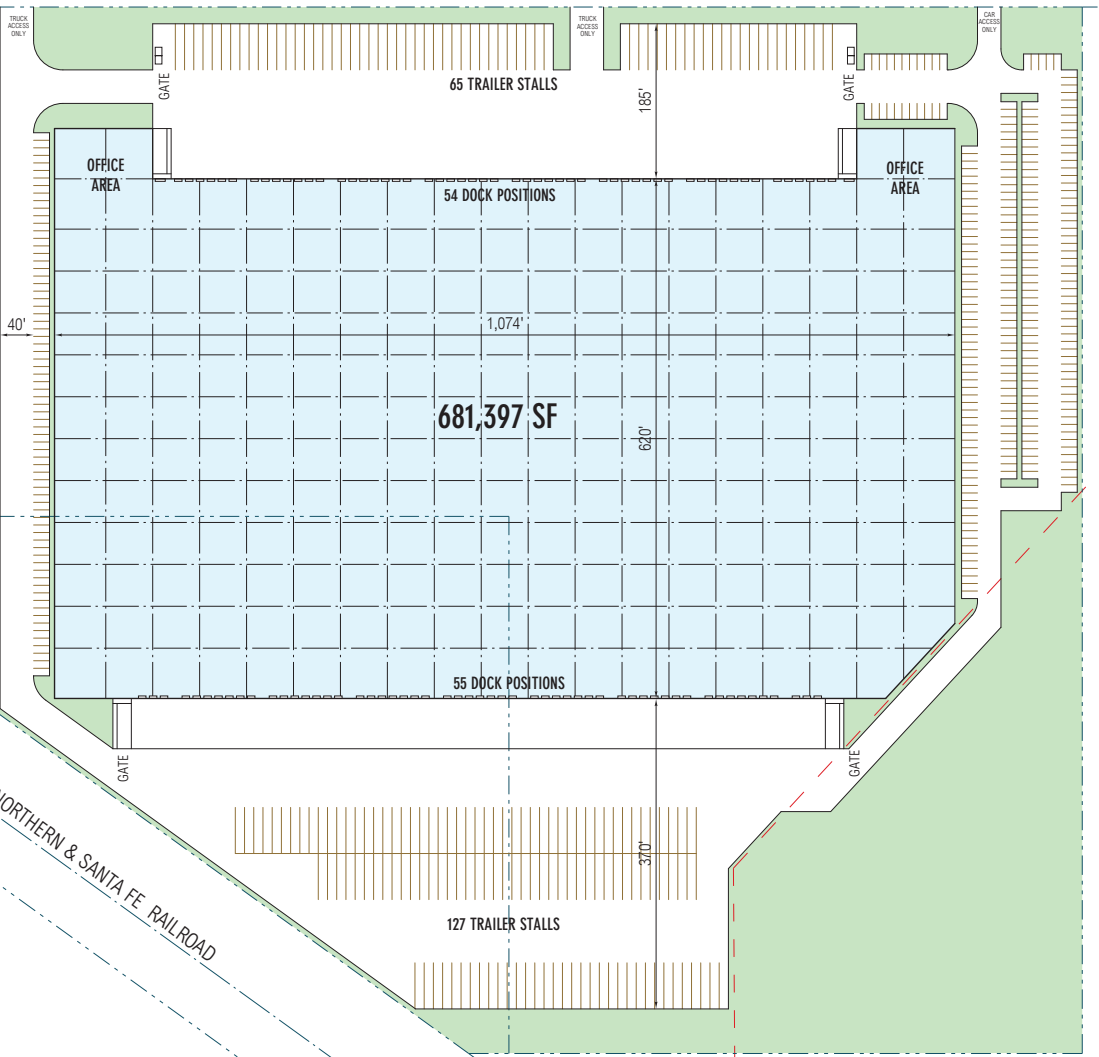
Source: ESRI Aerial Imagery, Riverside County

SOUTH PERRIS INDUSTRIAL
MSHCP CONSISTENCY ANALYSIS
Vegetation



Appendix B Site Plan

ELLIS AVENUE



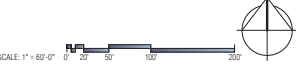
VICINITY MAP



PROJECT DATA

INDUSTRIAL SITE AREA:	
NET SITE AREA:	1,504,332 SF / 34.53 AC
BUILDING AREA:	
FOOTPRINT	676,397 SF
FIRE PUMP HOUSE	00 SF
MEZZANINE	5,000 SF
GUARD HOUSE	00 SF
TOTAL	681,397 SF
TOTAL INCLUDED PLANNED OFFICE AREA	20,000 SF
LOT COVERAGE: (50% MAX)	44.96 %
FAR COVERAGE:	45.29 %
AUTO PARKING REQUIRED: (HIGH CUBE PARKING STANDARDS)	
10,000 OFFICE PARKING (LESS THAN 10%)	00 STALLS
WAREHOUSE	
0-20,000 SF (1/1000 SF)	20 STALLS
20K + 40K (1/2000 SF)	10 STALLS
ABOVE 40K (1/5000 SF)	129 STALLS
TOTAL	159 STALLS
AUTO PARKING PROVIDED	276 STALLS
DOCK DOORS PROVIDED	109 DOORS
GRADE DOORS PROVIDED	4 DOOR
TRAILER PARKING 1/5,000 SF: (136 REQUIRED)	192 TRAILERS
LANDSCAPE AREA PROVIDED ON DEVELOPED SITE	282,083 SF / 18.75 %

BURLINGTON NORTHERN & SANTA FE RAILROAD



SOUTH PERRIS

0000 ELLIS AVENUE, CITY OF PERRIS

PRELIMINARY SITE PLAN - SCHEME 01



RGA PROJECT NO.	211037-01	
CDG FILE NAME:	211037-01-A1-01	
DRAWN BY:	MG	
CHECKED BY:	CS	
COPYRIGHT:	RGA, OFFICE OF ARCHITECTURAL DESIGN	
SHEET TITLE		
MARK	DATE	DESCRIPTION
13/4/21		CONCEPTUAL SITE PLAN

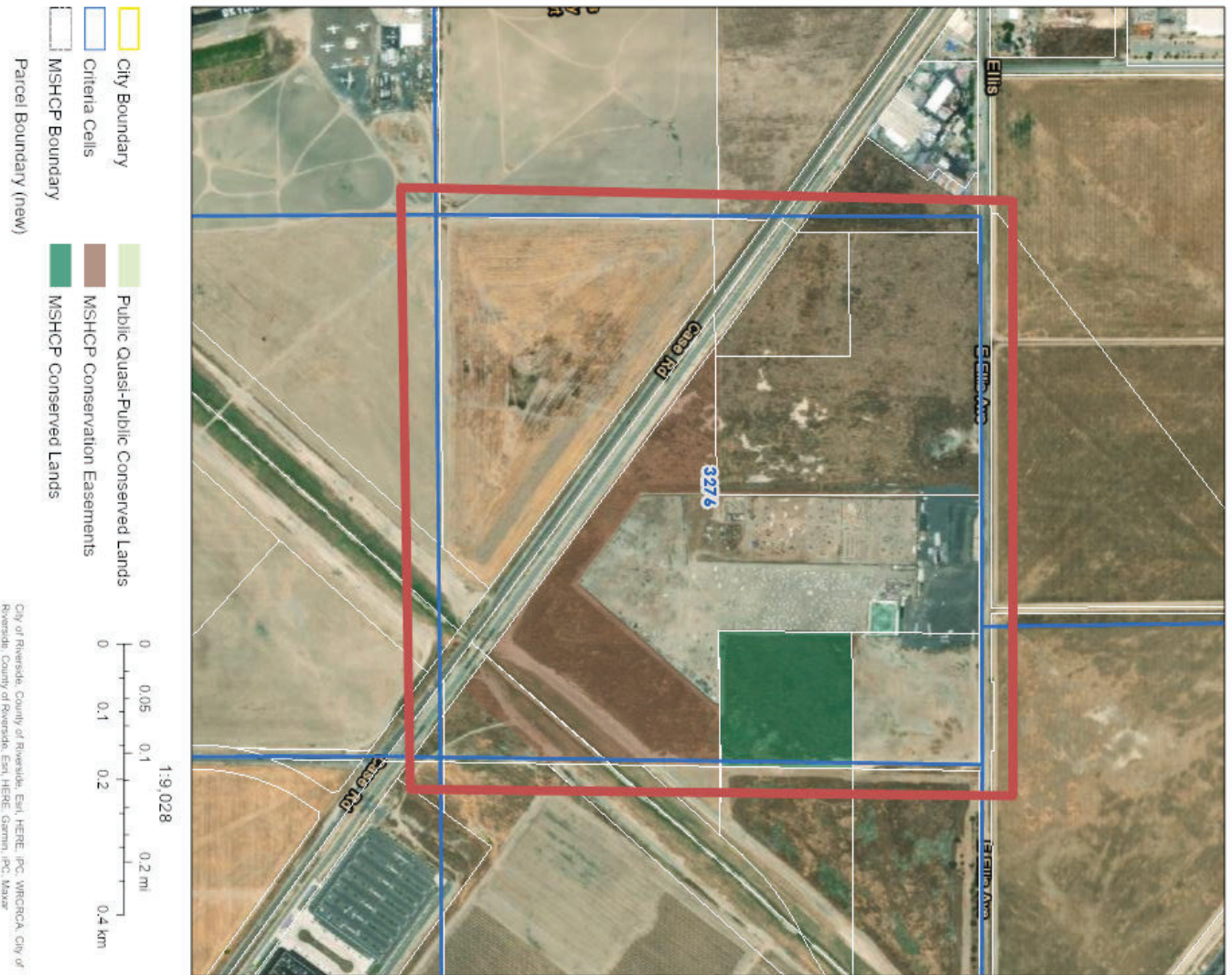
A1-01

Multiple Species Habitat Conservation Plan (MSHCP) Report

Area of Interest (AOI) Information

Length : 2.21 mi

Oct 1 2021 13:35:23 Pacific Daylight Time



Appendix C Site Photographs



Photograph 1: From the northwest corner of the project site looking south along the western boundary.



Photograph 2: From the northwest corner of the project site looking east along the northern boundary.



Photograph 3: From the northeast corner of the project site looking west along the northern boundary.



Photograph 4: From the northeast corner of the project site looking south along the eastern boundary.



Photograph 5: From the southeast corner of the project site looking north along the eastern boundary.



Photograph 6: From the southeast corner of the project site looking west along the southern boundary.



Photograph 7: From the southwest corner of the project site looking southeast along the southern boundary.



Photograph 8: From the southwest corner of the project site looking north along the western boundary.

Appendix D **Focused Criteria Area / Narrow
Endemic Plant Species and Western
Burrowing Owl Surveys** (Ecological
Sciences, 2022)



Focused Criteria Area / Narrow Endemic Plant Species and Western Burrowing Owl Surveys

±35-acre Site

APNs: 330-090-006, -007

Site Location:

Riverside County, California
Perris 7.5-minute USGS Quadrangle Map
Township 5 South, Range 3 West, Section 5

Prepared for:

Courtney Smith
Newcastle Partners, Inc.
4740 Green River Road, Ste. 110
Corona, CA 92878

Prepared by:

Scott Cameron
Ecological Sciences, Inc.
301 Thelma Drive, Ste. 192
Casper, WY 82609
scameron@ecosciencesinc.com

Surveys Conducted by:

Scott Cameron

Total Area Surveyed:

±35 acres

Surveys Conducted On:

March 8, 2022-NEPS/CAPS
April 6, 2022-BUOW
April 7, 2022-NEPS/CAPS/BUOW
April 8, 2022-BUOW
April 9, 2022-BUOW
April 25, 2022-NEPS/CAPS
May 10, 2022-NEPS/CAPS

Report Date:

August 14, 2022



August 14, 2022

Courtney Smith
Newcastle Partners, Inc.
4740 Green River Road, Ste. 110
Corona, CA 92878

SUBJECT: Results of Focused Surveys for Selected Narrow Endemic Plant Species / Criteria Area Plant Species and Western Burrowing Owl, ±34.52-acre Site, APNs 330-090-006, and -007, Riverside County, California

Dear Courtney:

This letter report presents findings of focused field surveys conducted to evaluate the presence of **Narrow Endemic Plant Species (NEPS) / Criteria Area Plant Species (CAPS)** and the special-status **Western Burrowing Owl (*Athene cunicularia hypugea*-BUOW)** pursuant to Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) guidelines.

Introduction

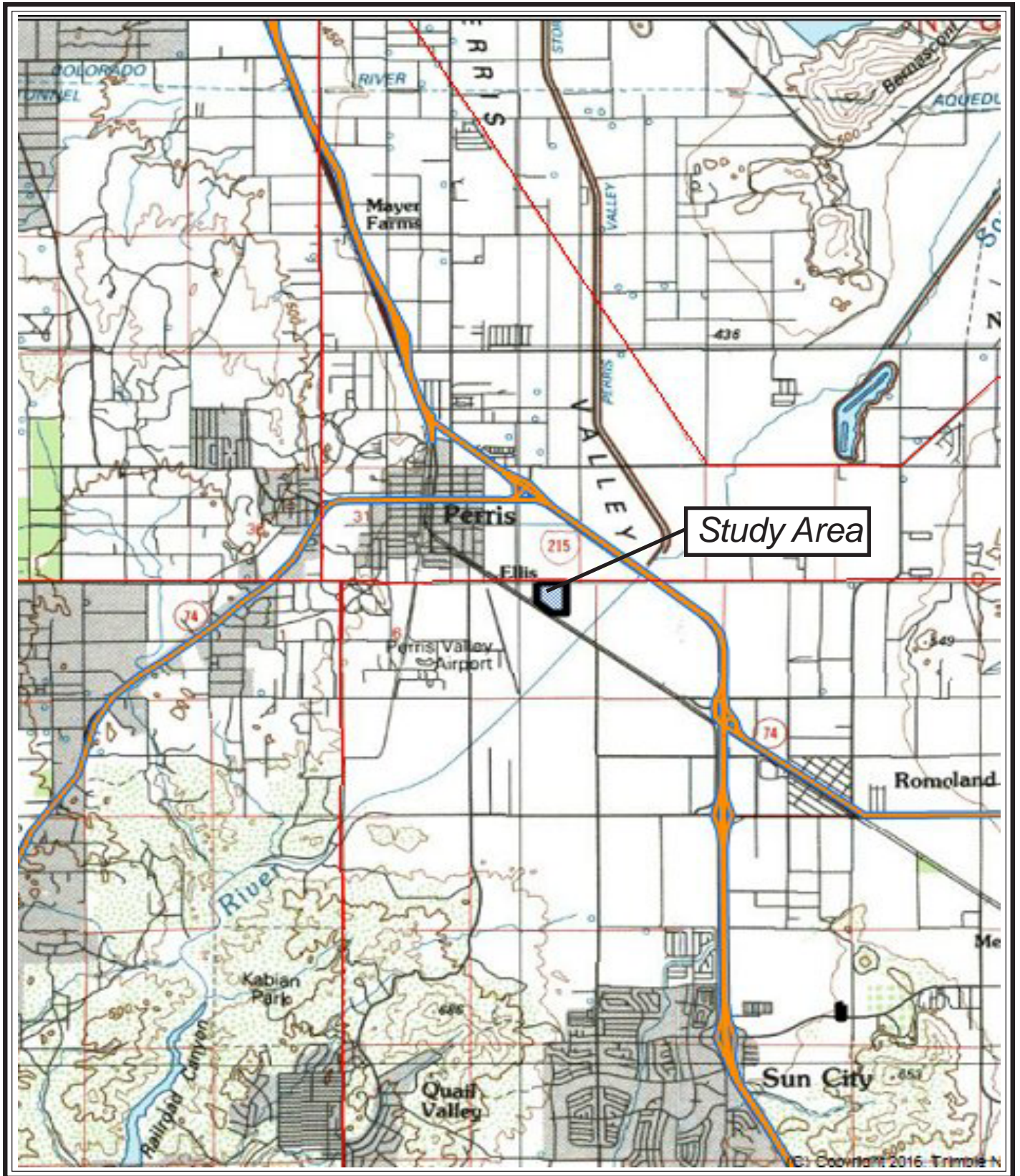
The site is regionally located in Riverside County, California (**Plate 1**). Specifically, the site is located south of E. Ellis Avenue, the Burlington Northern Santa Fe Railroad (BNSF) and Case Road on its southwestern boundary within Assessor's Parcel Numbers 330-090-006, and -007. The site occurs on the "Perris" USGS 7.5-minute quadrangle map, Township 5 South, Range 3 West, comprised a portion of Section 5 (**Plate 2**). **Plate 3** aerially illustrates the project site vicinity and features. Projects proposed in the area that contain potentially suitable habitat to support sensitive biological resources must demonstrate to reviewing agencies that potential project-related impacts to sensitive biological resources are adequately addressed and mitigated pursuant to the California Environmental Quality Act (CEQA), federal Endangered Species Act (Act), and the MSHCP.

Selected MSHCP Species Overview

Based on RCA MSHCP information, it was determined that the project site is located within the Mead Valley Area Plan within Criteria Cell 3276 that contributes to the assembly of Proposed Constrained Linkage 19. Further, it was determined that the project site is located within the designated survey area for burrowing owl (BUOW), Narrow Endemic Plant Species (NEPS), and Criteria Area Plant Species.

Criteria Cell 3276

The entire project site is located within Criteria Cell 3276, which is an independent Cell that is not affiliated with any Cell Group. Conservation within this Cell will contribute to assembly of Proposed Constrained Linkage 19 that focuses on the assembly of grassland habitat associated with the San Jacinto River. Areas conserved within this Cell will be connected to grassland habitat and agricultural land proposed for conservation in Cell 3277 to the east and to agricultural land proposed for conservation in Cell 3378 to the south, and will range from 45%-55% of the Cell focusing in the southern portion of the Cell. Proposed Constrained Linkage 19 (Low San Jacinto River) is located approximately in the center of the Mead Valley Plan Area and provides connectivity along the River and provides for movement of common mammals. It provides Habitat for a number of Planning Species,

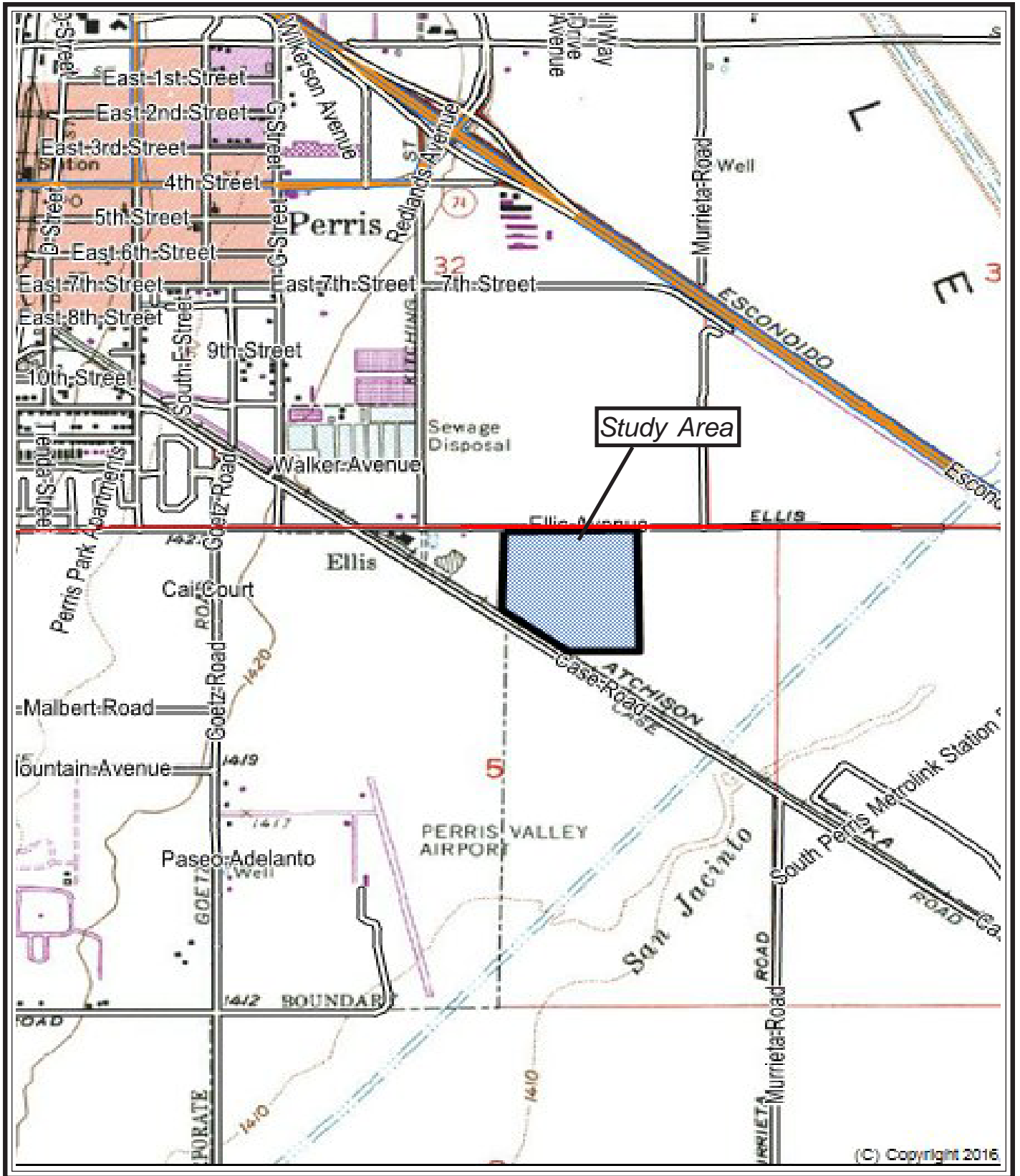


August 2022

plate 1

Regional Site Location

South Perris Industrial Project

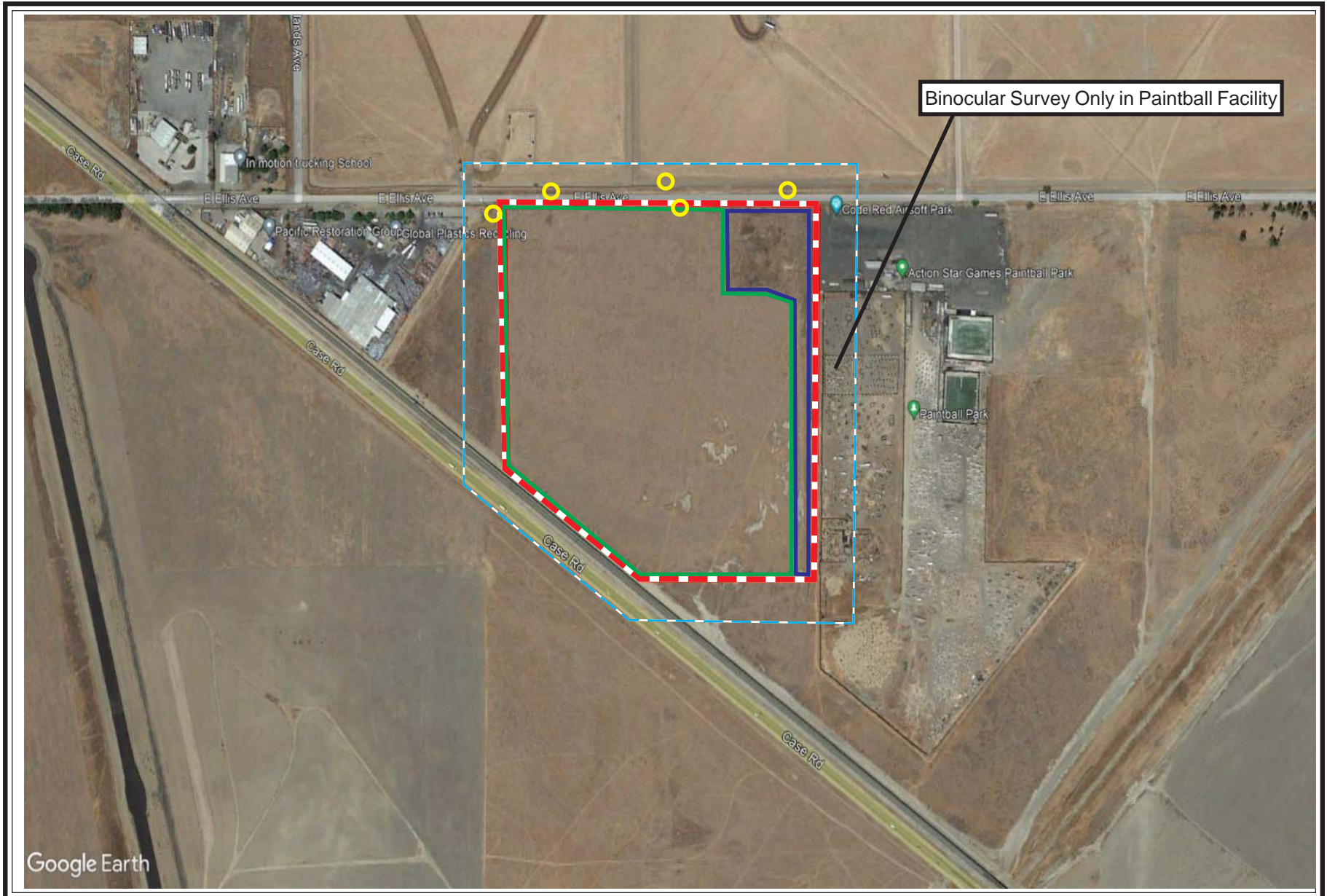


August 2022

plate 2

Site Vicinity

South Perris Industrial Project



Google Earth



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August 2022

- - - - - = Study Area
- = Non-native Grassland
- = Disturbed
- - - - - = BUOW Buffer Survey Area
- = Potential BUOW Refugia

plate 3

Site Features Schematic

South Perris Industrial Project

including mountain plover, loggerhead shrike, white-faced ibis, bobcat, Los Angeles pocket mouse, *San Jacinto Valley crownscale*, *Davidson's saltscale*, *thread-leaved brodiaea*, *vernal barley*, *Coulter's goldfields*, *spreading navarretia*, and *Wright's trichocoronis*. Treatment and management of edge conditions along this Linkage will be necessary to ensure that it provides Habitat and movement functions for species using the Linkage and that wetland functions and values are maintained for the benefit of NEPS known to occur in the San Jacinto River

Narrow Endemic Plant Species / Criteria Area Plant Species / BUOW

The subject site is located within an area requiring habitat assessments for selected MSHCP Narrow Endemic Plant Species (NEPS) and Criteria Area Plant Species (CAPS) prior to site development, and if suitable habitat is present, focused surveys are required for those species presented in **Tables 1** and **2**. **NEPS** known from the region include Munz's onion (*Allium munzii*), San Diego ambrosia (*Ambrosia pumila*), many-stemmed dudleya (*Dudleya multicaulis*), spreading navarretia (*Navarretia fossalis*), California Orcutt grass (*Orcuttia californica*), and Wrights trichocoronis (*Trichocoronis wrightii* var. *wrightii*). **CAPS** associated with the study area include San Jacinto Valley crownscale (*Atriplex coronata* var. *notatior*), Parish's brittlescale (*Atriplex parishii*), Davidson's saltscale (*Atriplex serenana* var. *davidsonii*), thread-leaved brodiaea (*Brodiaea filifolia*), smooth tarplant (*Centromadia pungens* ssp. *laevis*), round-leaved filaree (*Erodium macrophyllum*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), little mousetail (*Myosurus minimus* var. *apus*), and mud nama (*Nama stenocarpum*).

The site is also located in a habitat assessment area for the **burrowing owl (BUOW)**, and if potential habitat is present, focused BUOW surveys are required. Results of the focused NEPS/CAPS and BUOW surveys are intended to provide the applicant and reviewing regulatory agencies with preliminary biological information necessary for planning and permitting decisions concerning the proposed project.

The project site is located within federally designated Critical Habitat for spreading navarretia and thread-leaved brodiaea. However, the proposed project is not expected to have a federal nexus, and Section 7 consultation with the FWS would not be required for loss or adverse modification of Critical Habitat.

Table 1 **Narrow Endemic Plant Species (Group 3)**

Munz's Onion <i>Allium munzii</i>	FE	CT	1B	Chaparral, sage scrub, grassland, woodlands with clay soils	March-May
San Diego ambrosia <i>Ambrosia pumila</i>	FPE	--	1B	Chaparral, coastal scrub, grasslands, vernal pools with sandy loam or clay	May-September
Many-stemmed dudleya <i>Dudleya multicaulis</i>	---	--	1B	Scrub, grasslands, with clay soils	April-July
Spreading navarretia <i>Navarretia fossalis</i>	FT	--	1B	Meadows, vernal pools	April-June
California Orcutt grass <i>Orcuttia californica</i>	FE	CE	1B	Meadows, vernal pools	April-June
Wright's trichocoronis <i>Trichocoronis wrightii</i> var. <i>wrightii</i>	--	--	2	Meadows and seeps, marshes and swamps, riparian scrub, vernal pools/alkaline soils	May-September

Table 2

Criteria Area Plant Species (Group 3)

Scientific and Common Name	Status			Habitat Requirements	Flowering Period
	Federal	State	CNPS		
San Jacinto Valley crownscale <i>Atriplex coronata</i> var. <i>notatior</i>	FE	–	1B	Alkali flats, playas	April-August
Parish's brittle-scale <i>Atriplex parishii</i>	FSC	–	1B	Alkali meadows, chenopod scrub, playas	June-October
Davidson's salt-scale <i>Atriplex serenana</i> var. <i>davidsonii</i>	--	--	1B	Coastal bluff scrub, coastal scrub/alkaline; 10-200 meters in elevation	April-October
Thread-leaved brodiaea <i>Brodiaea filifolia</i>	FE	CE	1B	Vernal pools, scrub, woodland, grasslands with clay soils	March-June
Smooth tarplant <i>Centromadia pungens</i> ssp. <i>laevis</i>	FSC	–	1B	Alkaline grasslands, meadows, playas, scrub habitats	April-September
Round-leaved filaree <i>Erodium macrophyllum</i>	--	--	2	Cismontane woodland, valley and foothill grassland with clay soils	March-May
Coulter's goldfields <i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	FSC	–	1B	Playas, vernal pools	February-June
Little mouse-tail <i>Myosurus minimus</i> var. <i>apus</i>	FSC	–	1B	Vernal pools	March-June
Mud nama <i>Nama stenocarpum</i>	--	--	2	Marshes and swamps, lake margins, river banks	January-July

Table 1 and 2 Key

<p>Federal- U.S. Fish and Wildlife Service FE: Federally Endangered FT: Federally Threatened Species FPE: Federally Proposed Endangered FPT: Federally Proposed Threatened FC: Federal Candidate Species State-California Department of Fish and Wildlife CE: California Endangered CT: California Threatened CR: California Rare</p>	<p>CNPS California Native Plant Society List 1A: Plants presumed extinct in California. List 1B: Plants rare and endangered in California and elsewhere List 2: Plants rare and endangered in California, but more common elsewhere List 3: Taxa about which more information is needed List 4: Plants of limited distribution</p>
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Investigative Methods

Review of Existing Information

Existing documentation pertinent to the distribution and habitat requirements of the BUOW and NEPS/CAPS was reviewed and analyzed. This included a review of: (1) the California Natural Diversity Data Base (CNDDDB) for the Perris and surrounding USGS 7.5-minute quadrangle maps; (2) Final MSHCP (2003), (3) ELMT Consulting (2021), LSA (2015), Searl Biological Services (2015), and (4) other literature pertaining to habitat requirements of BUOW and NEPS/CAPS known from the site vicinity.



2022 Field Surveys

Focused NEPS/Criteria Area (CAPS) Plant Surveys

Focused NEPS surveys were conducted between March and May, 2022 (n=4) by Ecological Sciences to document plants and vegetation communities present on the site. Field surveys were scheduled (to the degree possible) to coincide with known flowering periods of NEPS/CAPS and/or during periods of detection (drought conditions may affect seasonal flowering periods). Surveys were conducted by transect surveys throughout the site with a topographic map and color aerial photograph for orientation. Data recorded included weather conditions, habitat quality, vegetation communities, plants species observed, land management practices, surrounding land uses, survey location, and time of day. Weather data were recorded using a digital thermocouple and digital anemometer, and by visual estimation of cloud cover and general weather characteristics. Site photographs were taken using a Casio digital camera. Weather conditions during the March-May 2022 surveys included clear to partly cloudy skies, 1-5 breezes, and ambient air temperatures of 68-85 °F.

Focused BUOW Surveys

A systematic survey for burrows and breeding season BUOW surveys (n=4) were conducted in April 2022 due to the presence of potentially suitable habitat. Focused surveys were conducted in accordance with current MSHCP guidelines (3-31-06). Accordingly, a series of 4 morning (one hour before sunrise to two hours after sunrise) or evening (two hours before sunset to one hour after sunset) surveys were conducted.

Pursuant to survey protocol, surveyors initially used binoculars to scan all suitable habitat/potential refugia prior to the start of pedestrian surveys. Habitat characteristics noted during the surveys included the presence of small mammal burrows, percentage of vegetative cover, on-site and surrounding land use, potential burrow sites with good horizontal visibility, and soil conditions. Weather data were recorded using a digital thermocouple and digital anemometer, and by visual estimation of cloud cover and general weather characteristics. Site photographs were taken using a Casio digital camera. Following the initial site scan, a systematic survey for burrows, burrowing owls, and owl sign was conducted by walking through suitable habitat over the entire survey area (i.e. the project site and at least visually with binoculars within 150 meters off site). To the extent possible, pedestrian survey transects were spaced to allow 100 percent visual coverage of the ground surface. The distance between transect center lines was no more than 30 meters (± 100 feet) and were reduced to account for differences in terrain, vegetation density, and ground surface visibility (where necessary). Potentially suitable burrows were examined for sign of BUOW use such as the presence of owl pellets, prey remains, or feathers at potential burrow entrances. Burrows were inspected with the aid of a mirror to better view burrow interiors. Weather conditions during the April 6-9 2022 surveys included 10-70 percent cloud cover, winds between 1-6 mph, and ambient air temperatures of 68-84 °F. No rainfall was recorded within 5 days of the surveys.

Existing Site Conditions

The subject study area is generally characterized as a flat, historically disturbed site that has been exposed to some form of anthropogenic disturbance either through discing, mowing, or other forms of disturbances associated with vehicular and pedestrian traffic. The project site primarily supports one distinct habitat type: dense non-native grassland. In addition, the site supports disturbed areas located in the northeast corner and along the eastern boundary of the site. Large soil debris piles are also present in this area. Several barren alkali areas are present on site, but no evidence of ponded or flowing water was observed. Due to existing land uses, no native plant communities or natural communities of special concern were observed on site. Surrounding land use includes a paintball facility to the east, industrial to the west, ongoing construction to the north, and vacant land to the south. **Plates 4a-4b** photographically illustrate existing site conditions.



View to east



View to south



View to north



View to west

The subject site has been used for agriculture since as early as 1938. An area of unknown deposited soil, approximately 200 feet by 200 feet and ranging in height by approximately 2 to 5 feet, was observed at the northeastern corner of the subject property in March 2022. Based on a review of historical photographs available on Google Earth, the soil appeared to be deposited between 2003 and 2006. Given the lack of information regarding its content and unknown origin, Haley Aldrich (2020) proposed to sample and analyze the unknown deposited soil. Upon testing the unknown deposited soil, arsenic was detected at a concentration greater than the published DTSC background concentration threshold. Based on the information obtained and the detection of elevated arsenic concentrations within the unknown deposited soil, Haley Aldrich recommended that this soil be removed from the site and disposed of at an appropriately regulated landfill. The contamination of soil on the eastern border of the subject site may have permanently altered the habitat and/or microhabitat conditions (Haley & Aldrich, Inc. 2022).

General Vegetation Components

The majority of the site supports a non-native grassland dominated by dense, non-native grasses such as bromes (*Bromus* spp.), Mediterranean grass (*Schismus barbatus*), and oats (*Avena* spp.). Additional species observed in the non-native grassland included Russian thistle (*Salsola tragus*), mustard (*Hirschfeldia incana*), Mediterranean grass (*Schismus barbatus*), filaree (*Erodium cicutarium*), and short-pod mustard (*Brassica geniculata*), foxtail chess (*Bromus madritensis* ssp. *rubens*), horehound (*Marrubium vulgare*), sandmat (*Euphorbia* sp.), telegraph weed (*Heterotheca grandiflora*), puncture vine (*Tribulus terrestris*) and jimsonweed (*Datura wrightii*). **Appendix A** lists all plants species recorded on site. No special-status plant communities are present on site.

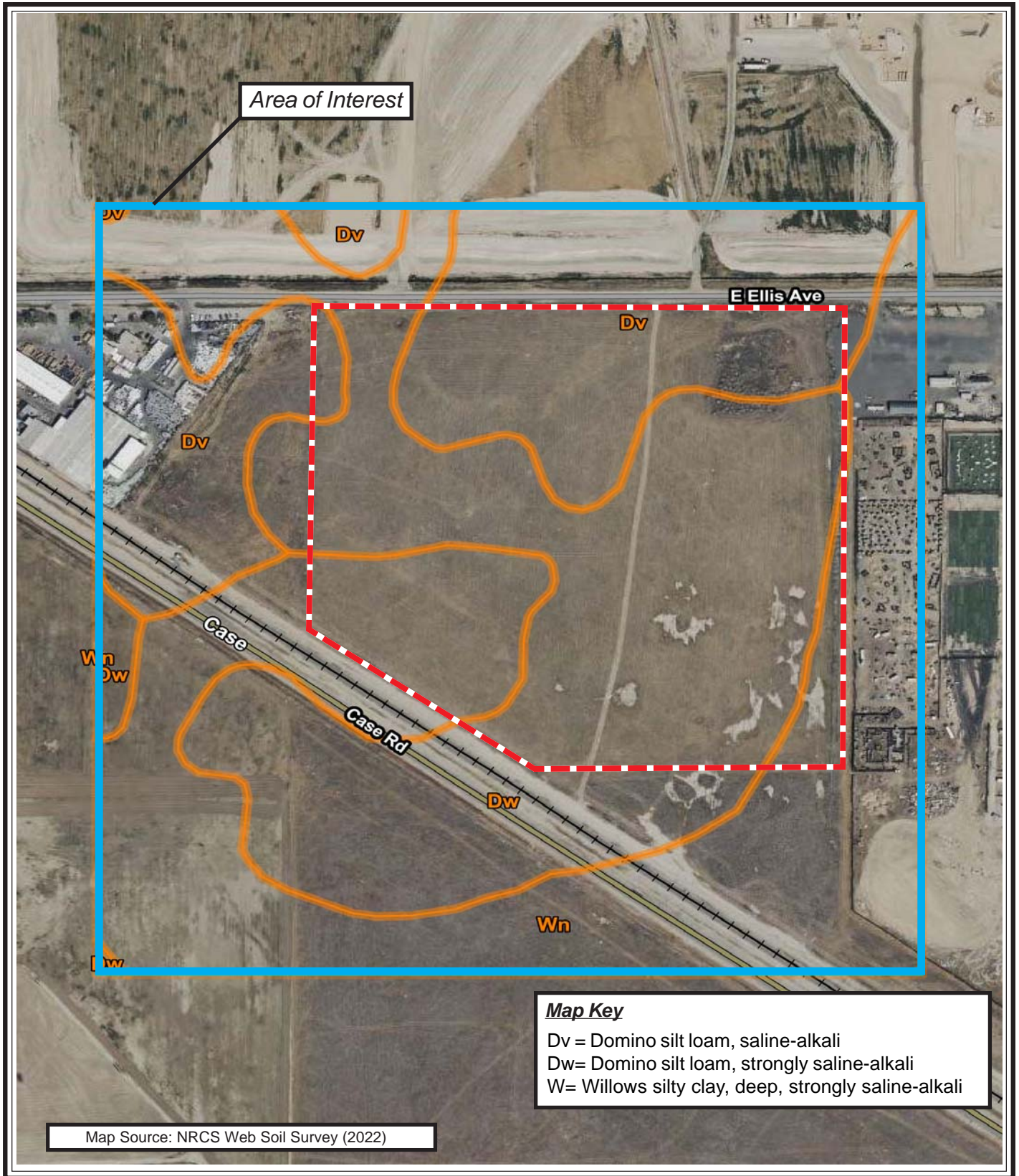
General Soils Analysis / Soil Conservation Map Review

A general surface soils analysis was also conducted for the site due to the close association of certain special-status plant species to particular soil types (e.g., clay or alkaline). According to the Natural Resource Conservation District (NRCS 2022) website, the study area supports 3 soil types that include: (1) Domino silt loam (saline-alkali)-Dv, (2) Domino silt loam (strongly saline-alkali)-Dw, (3) Willows silty clay (deep, strongly saline-alkali)-Wn. The project site is relatively flat, with no areas of topographic relief, at an approximate elevation of 1,415 above mean sea level. Long-standing anthropogenic activities (e.g., routine weed abatement and discing) may have altered soil chemistry and other substrate characteristics such that on-site soils are not currently capable of supporting sensitive plant species. **Plate 5** illustrates project area soils.

Results

2022 Focused NEPS/Criteria Area Survey Results (6.1.3)

No **NEPS** were recorded on site during the March-May 2022 focused surveys. Suitable habitat for **Munz's onion** is described as mesic exposures or seasonally moist microsites in grassy openings in coastal sage scrub, chaparral, juniper woodland, valley and foothill grasslands in clay soils (e.g., Altamont, Auld, Bosanko, Claypit, and Porterville series). These soil types and habitats are absent from the site and as such, this species would not be expected to occur. The site does not support open floodplain terraces, sparse non-native grasslands or ruderal habitats in association with river terraces, vernal pools, and/or alkali playas, and as such, the **San Diego ambrosia** is not expected to occur. **Many-stemmed dudleya** is associated with openings in chaparral, coastal sage scrub, and grasslands underlain by clay and cobbly clay soils within the Altamont, Auld, Bosanko, Claypit, and Porterville series. These conditions are absent from the site and as such, this species would not be expected to occur. Suitable habitat for **spreading navarretia** is limited to vernal pools, depressions, and ditches in association with alkali (Willows and Traver) soils; Willow soils are present on site, but are highly disturbed (low occurrence potential). **California Orcutt grass** is primarily restricted to the southern



August 2022

Map Source: NRCS Web Soil Survey (2022)

--- = Study Area

plate 5

Project Area Soils

South Perris Industrial Project

basaltic claypan vernal pools in association with clay or alkali soils (Domino, Willows and Traver). Domino and Willows soils are mapped on site, but the surface is highly disturbed from anthropogenic activities (low occurrence potential). Similarly, habitat suitable for **Wright's trichocoronis** is primarily restricted to the alkali floodplains (seasonal wetlands) of the San Jacinto River in association with Willows, Domino and Traver soils. Although Domino and Willow soil types are present, this taxon is not expected to occur. Exposure to various and recurring anthropogenic disturbances has likely altered soil chemistry and other substrate characteristics resulting in the absence of habitat and/or microhabitat conditions in 2022 most often associated with the selected NEPS. Accordingly, no NEPS are currently expected to occur within the study area.

No **Criteria Area** plant species were recorded on site during the March-May 2022 focused surveys. Suitable habitat associated with **San Jacinto Valley crownscale** include alkali flats and playas. These conditions are not present on site due to long-standing surface disturbances (low occurrence potential). **Parish's brittlescale** is associated with alkali meadows, chenopod scrub, and playas which are not present (low occurrence potential). **Davidson's saltscale** occurs on coastal bluff scrub and in coastal scrub under alkaline conditions which are entirely absent on site (low occurrence potential). **Thread-leaved brodiaea** occurs in vernal pools, scrub, woodlands, and grasslands with clay soils that are not present on site (low occurrence potential). **Smooth tarplant** is associated with alkaline grasslands and meadows, playas, and scrub habitats. Although alkaline soils are present, this species was not recorded on site (moderate occurrence potential). **Round-leaved filaree** occurs in cismontane woodland, valley and foothill grasslands with clay soils. None of the conditions occur on site (low occurrence potential). **Coulter's goldfields** occur on playas and vernal pools that are not present (low occurrence potential). **Little mousetail** requires vernal pools which were not recorded on site (low occurrence potential). **Mud nama** requires marshes and swamps, lake margins, and riverbanks that are entirely absent from the site (low occurrence potential). Exposure to various and recurring anthropogenic disturbances has likely altered soil chemistry and other substrate characteristics resulting in the absence of habitat and/or microhabitat conditions in 2022 most often associated with the selected CAPS. No vernal pools or vernal pool habitat was observed on the project site. However, the project site is underlain by Domino and Willows soil associations that are identified in the MSHCP as having the potential to provide suitable habitat for CAPS. No CAPS are currently expected to occur within the study area.

Recurring and long-standing anthropogenic surface disturbances such as discing, debris dumping, vehicles, and weed abatement may have rendered the site currently unsuitable for these species. In the 2005 LSA Report, spreading navarretia (Federal Threatened), San Jacinto Valley Crownscale (Federal Endangered), and smooth tarplant (MSHCP) were recorded approximately 1.2 miles south of the site, but were not recorded directly on site. Historical records (CNDDB) for these species are also known from the site vicinity, but land use changes have significantly changed the historic landscape of the region.

Although no NEPS/CAPS were recorded directly on site, several protected plant species were recorded on an adjacent offsite parcel in 2015 (generally referred to as the paintball site) by Searl Biological Services (Western Riverside County MSHCP Compliance Document, July 1). This site is located to the east and south of the study area. The southern extent of the adjacent site is the San Jacinto River. These offsite species included **smooth tarplant** (CRPR 1B.1; not CESA or FESA listed), **paniculate tarplant** (not covered by the WRMSHCP; CRPR 4.2; CNPS plant), and **San Jacinto Valley crownscale** (FE, CRPR 1B.1; not CESA listed). Microhabitat conditions may be unsuitable on site despite the close proximity to known locations. No focused plant surveys were conducted off site as part of this survey effort conducted in 2022. (WRMSHCP=Western Riverside Multiple Species Habitat Conservation Plan; CRPR=California Rare Plant Ranking System; CESA=California Endangered Species Act; FESA=Federal Endangered Species Act; FE=Federal-listed Endangered).

2022 BUOW Survey Results (6.3.2)

No direct BUOW observations or sign (feathers, pellets, fecal material, prey remains, etc.) were recorded during the April 2022 focused surveys. Birds observed generally included those species that are accustomed to nearby human presence such as those indicated in **Appendix B**. Scarce potential nesting refugia (e.g., small mammal burrows) is scattered throughout the site (primarily along peripheral areas and in soil debris piles along the northern boundary). Nonetheless, the site (and surrounding areas not developed) support potentially suitable BUOW nesting/foraging habitat (moderate occurrence potential). None of the burrows/refugia inspected during the April 2022 surveys were determined to be currently occupied or recently used by BUOW based on the lack of owl observations and absence of sign around burrow entrances. Surveys of the site and scanning adjacent areas during peak BUOW activity times did not reveal any indication that this species was currently present or utilizing the site for foraging purposes. Nonetheless, potential nesting and foraging habitat for BUOW is present on and adjacent to the site and the subject site could be occupied by BUOW at anytime of the year. This taxon is well known to occur in the site vicinity. Due the presence of suitable BUOW habitat and the potential for this taxon to occur, preconstruction surveys (at a minimum), would be required prior to any development activities. If BUOW were recorded during any subsequent site surveys, their presence would impose some degree of constraint (e.g., compliance with MSHCP, CDFW, MBTA) to development depending upon the nature and extent of potential impacts [e.g., number of BUOW pair(s)] and the seasonal timing of proposed construction activities. If it were later determined that active nests would be lost as a result of site-preparation, it would be in conflict with MSHCP species-specific conservation objectives.

Summary Conclusion

In summary, no special-status plants (NEPS/CAPS) were observed on the project site during the field investigations conducted in 2005 (LSA), 2021 (ELMT), and 2022 (ESI). These plant species are presumed currently absent from the project site due to negative survey results, lack of native microhabitats more commonly associated with these species, and exposure to routine and long-standing disturbances. Protected plant species known from the site vicinity are not currently expected to occur on site. No native plant communities or natural communities of special concern were observed on site. In addition, No BUOW were observed during the focused 2022 survey effort following MSHCP guidelines.

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this biological survey, and that the facts, statements, and information presented herein are true and correct to the best of my knowledge and belief.

Sincerely,

Ecological Sciences, Inc.



Scott D. Cameron
Principal Biologist



References

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Appendix A
Plant Species List¹
 ±35-acre Perris Site

Family	Scientific Name	Common Name
Asteraceae		
	<i>Ambrosia acanthicarpa</i>	Annual bur-weed
	<i>Centaurea melitensis</i> *	Tocolote
	<i>Deinandra fasciculata</i>	Slender tarweed
	<i>Heterotheca grandiflora</i>	Telegraph weed
	<i>Helianthus annuus</i>	Common sunflower
	<i>Lactuca serriola</i>	Prickly lettuce
	<i>Sonchus oleraceus</i>	Common sow thistle
	<i>Xanthium strumarium</i>	Cocklebur
	<i>Corethrogyne filaginifolia</i>	California sand aster
Amaranthaceae		
	<i>Amaranthus albus</i>	Tumbleweed
Boraginaceae		
	<i>Amsinckia menziesii</i>	Common fiddleneck
Brassicaceae		
	<i>Brassica nigra</i> *	Black mustard
	<i>Hirschfeldia incana</i> *	Short-podded mustard
Chenopodiaceae		
	<i>Salsola tragus</i> *	Russian thistle
	<i>Atriplex semibaccata</i> *	Australian saltbush
	<i>Chenopodium berlandieri</i>	Pitseed goosefoot
	<i>Atriplex argenea</i>	Silverscale
Euphorbiaceae		
	<i>Eremocarpus setigerus</i>	Dove weed
Fabaceae		
	<i>Trifolium repens</i> *	White clover
	<i>Medicago polymorpha</i>	Bur-clover
Geraniaceae		
	<i>Erodium cicutarium</i> *	Red-stemmed filaree
Lamiaceae		
	<i>Marrubium vulgare</i> *	Horehound
Malvaceae		
	<i>Malva parviflora</i> *	Cheeseweed
	<i>Marrubium vulgare</i> *	Horehound
Poaceae		
	<i>Bromus diandrus</i> *	Ripgut
	<i>Bromus hordeaceus</i>	Soft brome
	<i>Bromus madritensis ssp. rubens</i> *	Red brome
	<i>Schismus barbatus</i> *	Mediterranean grass
	<i>Hordeum marinum</i> *	Barley

Appendix A-continued

Plant Species List¹ ±35-acre Perris Site

Family	Scientific Name	Common Name
	<i>Distichlis spicata</i>	Salt grass
Solanaceae		
	<i>Datura wrightii</i>	Jimson weed

KEY:

¹ Observed during field surveys conducted in March-May 2022 by Ecological Sciences at the subject ±35-acre site located in Riverside County, California.

² Scientific and common names are generally from Hickman (1993) and Munz (1974) and Roberts et.al (2004)

* Non-native

**CNPS List 4

Appendix B

Wildlife Species List¹ ±35-acre Perris Site

Family	Scientific Name ²	Common Name ²
Reptiles		
Phrynosomatidae	<i>Uta stansburiana</i>	Side-blotched lizard
Birds		
Accipitridae	<i>Cathartes aura</i>	Turkey vulture
	<i>Buteo jamaicensis</i>	Red-tailed hawk
Alaudidae	<i>Eremophila alpestris</i>	Horned lark
Charadriidae	<i>Charadrius vociferus</i>	Killdeer
Columbidae	<i>Columba livia</i>	Rock pigeon
	<i>Zenaida macroura</i>	Mourning dove
Corvidae	<i>Corvus corax</i>	Common raven
	<i>Euphagus cyanocephalus</i>	Brewer's blackbird
Mimidae	<i>Mimus polyglottos</i>	Northern mockingbird
Tyrannidae	<i>Tyrannus verticalis</i>	Western kingbird
	<i>Sayornis saya</i>	Say's phoebe
Alaudidae	<i>Eremophila alpestris actia</i>	California horned lark*
Icteridae	<i>Sturnella neglecta</i>	Western meadowlark
	<i>Euphagus cyanocephalus</i>	Brewer's blackbird
Passeridae	<i>Passer domesticus</i>	House sparrow
Mammals		
Leporidae	<i>Sylvilagus audubonii</i>	Desert cottontail
Sciuridae	<i>Spermophilus beecheyi</i>	California ground squirrel
Geomyidae	<i>Thomomys bottae</i>	Pocket gopher

KEY:

¹ Observed during BUOW surveys conducted by Ecological Sciences in April 2022 on the subject ±35-acre project site located in Riverside County, California. Not intended to represent an exhaustive list of vertebrate species.

² Scientific nomenclature and common names follow Collins et al. (1990); American Ornithologists' Union (1989); and Jones et al. (1992).

* Special-status species covered under MSHCP

BIOLOGICAL REPORT SUMMARY SHEET

(Submit two copies to the County)

Applicant Name: South Perris Industrial Project
 Assessor's Parcel Number (APN): 330-090-006, and -007
 APN cont : _____
 Site Location: Section: 32 Township: 4 South Range: 3 West
 Site Address: _____
 Related Case Number(s): _____ PDB Number: _____

CHECK SPECIES SURVEYED FOR	SPECIES or ENVIRONMENTAL ISSUE OF CONCERN	(Circle Yes, No or N/A regarding species findings on the referenced site)		
		Yes	No	N/A
	Arroyo Southwestern Toad	Yes	No	N/A
	Blueline Stream(s)	Yes	No	N/A
	Coachella Valley Fringed-Toed Lizard	Yes	No	N/A
	Coastal California Gnatcatcher	Yes	No	N/A
	Coastal Sage Scrub -habitat *	Yes	No	N/A
	Delhi Sands Flower-Loving Fly	Yes	No	N/A
	Desert Pupfish	Yes	No	N/A
	Desert Slender Salamander	Yes	No	N/A
	Desert Tortoise	Yes	No	N/A
	Flat-Tailed Horned Lizard	Yes	No	N/A
	Least Bell's Vireo	Yes	No	N/A
	Oak Woodlands	Yes	No	N/A
	Quino Checkerspot Butterfly	Yes	No	N/A
	Riverside Fairy Shrimp	Yes	No	N/A
	Santa Ana River Woollystar	Yes	No	N/A
	San Bernardino Kangaroo Rat	Yes	No	N/A
	Slender Horned Spineflower	Yes	No	N/A
	Stephen's Kangaroo Rat	Yes	No	N/A
	Vernal Pools	Yes	No	N/A
	Wetlands	Yes	No	N/A

CHECK SPECIES SURVEYED FOR	SPECIES or ENVIRONMENTAL ISSUE OF CONCERN	(Circle Yes, No or N/A regarding species findings on the referenced site)		
X	Other Burrowing Owl Habitat	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
X	Other 6.1.2 Habitat	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
X	Other 6.1.3 Habitat	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
X	Other Burrowing Owl	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
X	Other Criteria Area Plants	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
X	Other NEPS	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
	Other	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
	Other	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
	Other	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
	Other	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
	Other	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
	Other	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A

*low occurrence potential

Species of concern shall be any unique, rare, endangered, or threatened species. It shall include species used to delineate wetlands and riparian corridors. It shall also include any hosts, perching, or food plants used by any animals listed as rare, endangered, threatened or candidate species by either State, or Federal regulations, or for Riverside County as listed by the California Department of Fish and Game Natural Diversity Data Base (NDDB).

I declare under penalty of perjury that the information provided on this summary sheet is in accordance with the information provided in the biological report.

Ecological Sciences, Inc.

August 14, 2022

Signature and Company Name

Report Date

10(a) Permit Number (if applicable)

Permit Expiration Date

County Use Only

Received by: _____

Date: _____

PD-B# _____

LEVEL OF SIGNIFICANCE CHECKLIST
For Biological Resources
 (Submit Two Copies)

Case Number: _____ Lot/Parcel No. _____ EA Number _____

Wildlife & Vegetation

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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(Check the level of impact the applies to the following questions)

- a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?
 . . . **Participation in MSHCP required**
- b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?
 . . .
- c) 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. Wildlife Service?
 . . .
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?
 . . .
- e) 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?
 . . .
- f) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
 . . .
- g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
 . . .

Source: CGP Fig. VI.36-VI.40

Findings of Fact: > No BUOW observations or selected NEPS/CAPS observed on site during focused surveys conducted in March-May 2022.

Proposed Mitigation: > Conduct a pre-activity BUOW survey (at a minimum) within 30 days of construction pursuant to MSHCP guidelines. If future surveys indicate presence of BUOW, additional mitigation may be necessary relative to MBTA, CDFG code, and/or MSHCP (e.g., passive relocation outside of the breeding season if owl(s) were later present on site).

Monitoring Recommended: > Not recommended unless BUOW or other protected species present during construction