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Appendix B:

# **Biological Resources Assessment and Multiple Species Habitat Conservation Plan Consistency Analysis**

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La Sierra Alhambra Residential Project

# Biological Resources Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis

*City of Riverside, California*

*Assessor's Parcel Numbers (APNs) 149-052-004, -009, -011, -012, -013, and -014*

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**PREPARED FOR:**

**MLC Holdings, Inc.**

5 Peters Canyon Road, Suite 310  
Irvine, California 92606

Contact: Louisa Feletto

**PREPARED BY:**

**FirstCarbon Solutions**

967 Kendall Drive, #A-537  
San Bernardino, CA 92407  
714.508.4100

Contact: Angela Wolfe, Senior Project Manager  
Joseph Vu, Senior Biologist

January 16, 2025

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# La Sierra Alhambra Residential Project

## Biological Resources Assessment and MSHCP Consistency Analysis

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**LA SIERRA ALHAMBRA RESIDENTIAL PROJECT  
BIOLOGICAL RESOURCES ASSESSMENT AND MSHCP CONSISTENCY ANALYSIS**

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# 1 - INTRODUCTION

This Biological Resources Assessment (BRA) and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis was prepared by FirstCarbon Solutions (FCS) to support the proposed La Sierra Alhambra Residential Project (proposed project) located in the City of Riverside, California. The purpose of this document is to (1) briefly describe the proposed project and characterize existing and potentially occurring biological resources on the project site and adjacent areas; (2) summarize relevant local, State, and federal regulations pertaining to biological resources; (3) identify and analyze requirements of the MSHCP and determine project consistency with its goals, objectives, and requirements; (4) analyze potential project-related impacts on regulated biological resources in the context of the California Environmental Quality Act (CEQA); and (5) recommend appropriate implementation measures, as needed, including applicable measures from the General Plan Final Environmental Impact Report (EIR)<sup>1</sup>, to offset potential impacts on biological resources according to CEQA standards.

## 1.1 - Project Location and Setting

The approximate 9.88-acre project site is located on the southern corner of La Sierra Avenue and Alhambra Avenue, in the City of Riverside (City), in Riverside County (County) California (Exhibit 1).<sup>2</sup> The project site is currently occupied by several residential structures which would be demolished prior to development. The project site is bounded by La Sierra Avenue, Loma Vista Middle School, and single-family residences to the east; single-family residences and Francisco Place to the south; single-family residences and Alhambra Avenue to the west, and single-family residences and Alhambra Avenue to the north (Exhibit 2 and Exhibit 3). The La Sierra Hills are approximately 0.23 miles to the west. The project site is located within the *Riverside West* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map, Township 3 South, Range 6 West.

## 1.2 - Project Description

MLC Holdings, LLC (project applicant) proposes the construction of 56 single-family residences consisting of 52 two-story residences on 45 feet by 79 feet minimum lots and four single-story residences on estate-sized parcels a minimum of 20,000 square feet in size. The proposed project encompasses approximately 9.88 acres in addition to approximately 0.36 acres of roadway and frontage improvements. Residences would range between approximately 2,000 square feet to 2,500 square feet. The estate-sized parcels would be intended to support animal keeping while providing a smooth transition from the existing horse keeping lots across Alhambra Avenue. The proposed project

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<sup>1</sup> City of Riverside. 20. Final Program Environmental Impact Report for the City of Riverside General Plan 2025. Website: <https://www.riversideca.gov/cedd/planning/general-plan>. Accessed January 6, 2025.

<sup>2</sup> This acreage includes 9.51 acres of disturbance area and 0.37 acres to be dedicated to the City of Riverside.

would include private roadways, common space and amenity areas, landscaping, and pedestrian walkways throughout the site (Exhibit 4).

The project site currently contains several trees that will be removed prior to development. The project site also contains three existing single-family residences with associated structures and an in-ground swimming pool. These residences would be demolished before the development of the proposed project.

### 1.2.1 - Off-site and Frontage Improvements

The proposed project would include approximately 0.36 acre roadway and frontage improvements (Exhibit 4).

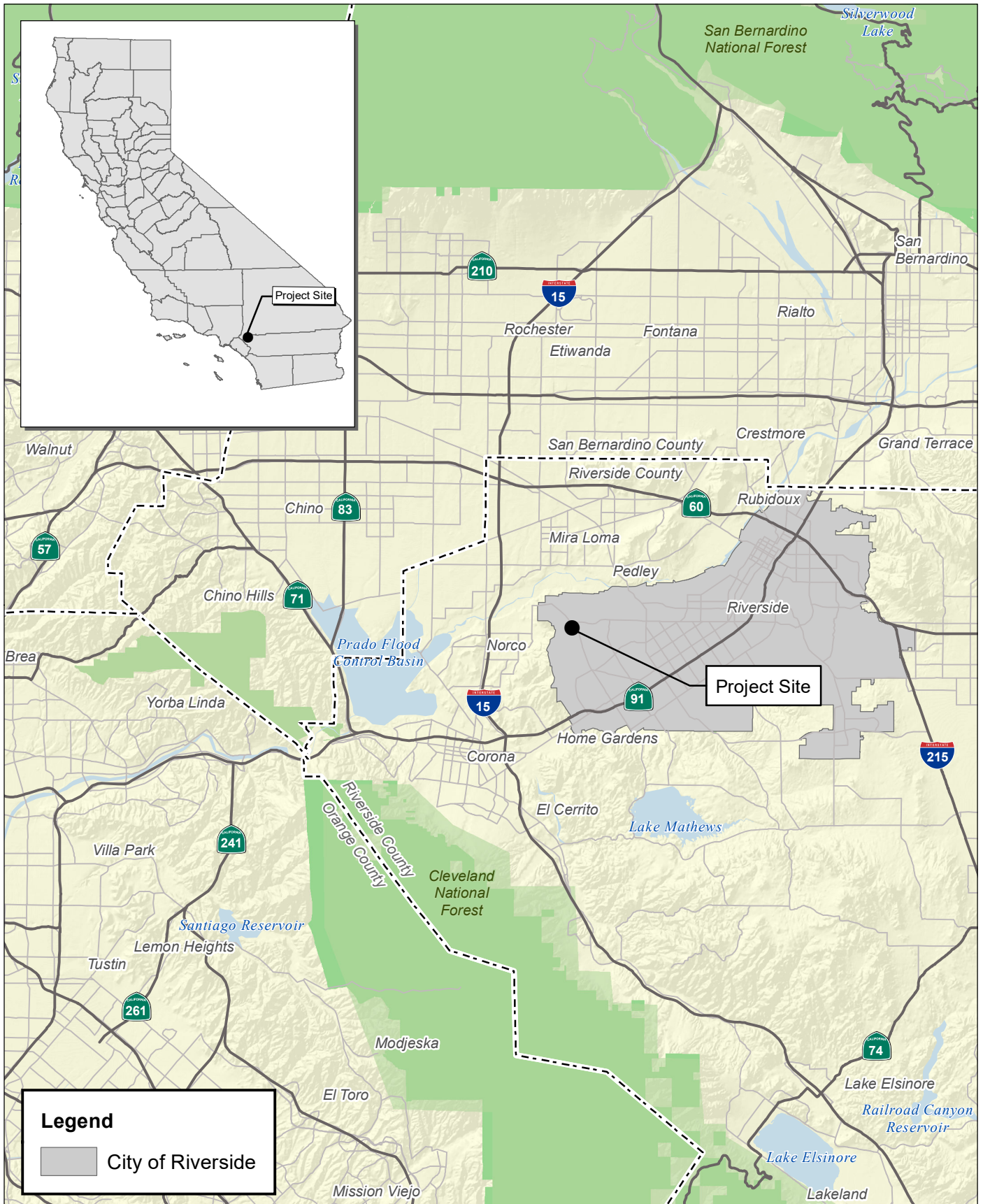
Off-site design features include:

- Alhambra Avenue improvements—The proposed project would widen Alhambra Avenue adjacent to the estate lots to its full paved width section.
- Installation of Red Curb—The proposed project would coordinate with the City of Riverside Traffic Division to implement red curb parking restrictions along the inside of the horizontal curve of Alhambra Avenue approaching the first proposed residential home along with advance curve ahead warning signage and centerline striping.
- Riverside Transit Association (RTA) Coordination—The proposed project would install bus stop amenities for the existing bus stop located along the project frontage through consultation with the RTA.
- La Sierra and Driveway 1—The proposed project would construct Driveway 1 on La Sierra Avenue with stop controls for the eastbound traffic (proposed project egress) in order to facilitate site access.
- La Sierra and Driveway 1/Somervale Drive—The proposed project would construct a median opening at La Sierra Avenue and Driveway 1/Somervale Drive to accommodate northbound and southbound left turn lanes with 100 feet of storage length.

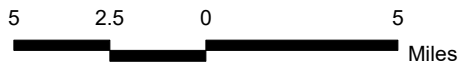
### 1.2.2 - City Street Dedication

The proposed project would also include 0.37 acres of street dedication to the City, consisting of the following:

- La Sierra Avenue improvements—The proposed project would include a 9-foot-wide offer of dedication along the La Sierra Avenue frontage with new sidewalk and landscape strip. The existing curb line will remain as is with old driveway cuts being replaced.
- Alhambra Avenue improvements—No concrete sidewalk or parkway will be installed, but rather a decomposed granite (DG) trail to match the rural residential aesthetic across the street. The improvements include a 13-foot-wide offer of dedication along Alhambra on the north side of the project boundary to accommodate the DG trail along with road widening and curb and gutter improvements.

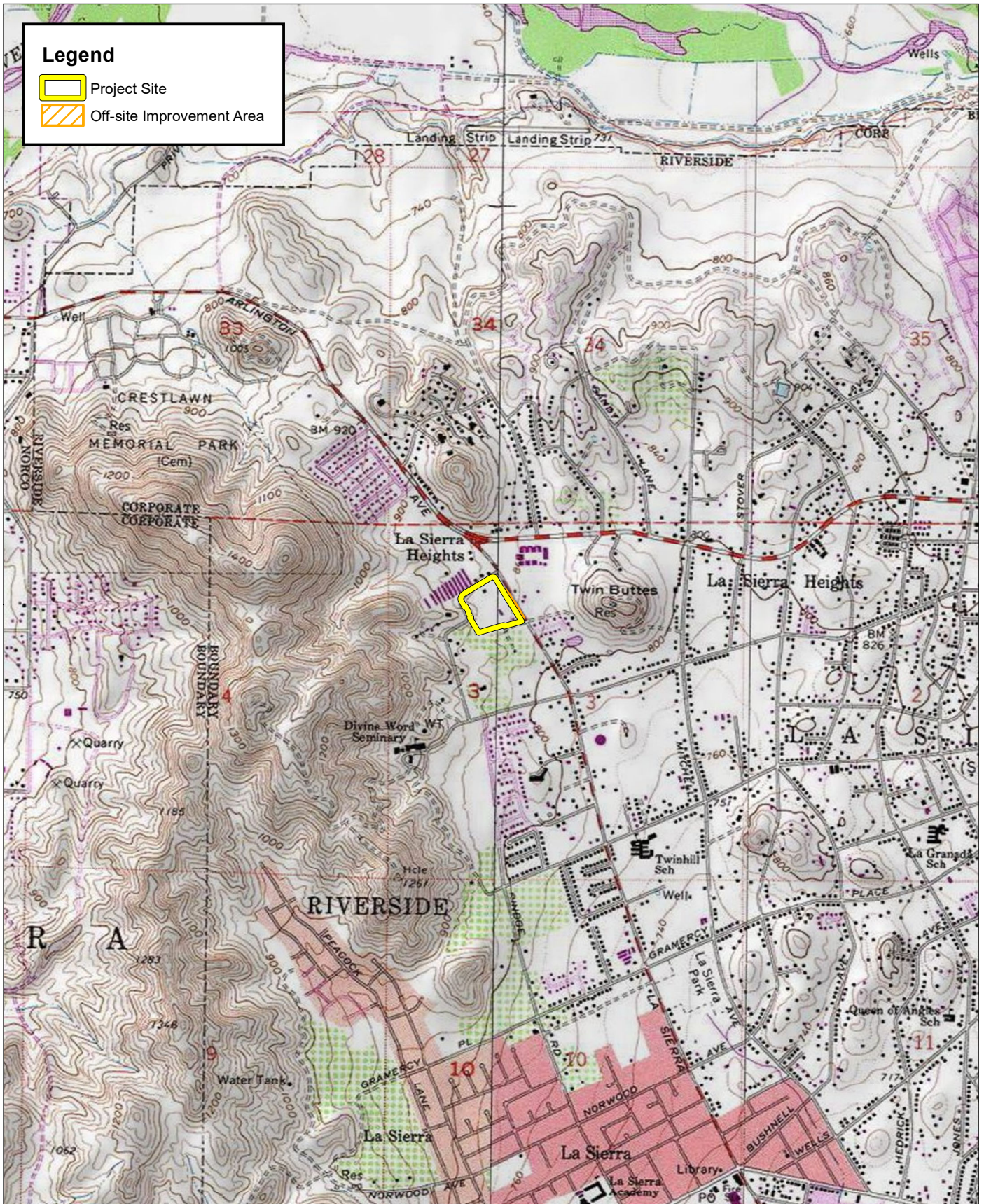


Source: Census 2000 Data, The California Spatial Information Library (CaSIL).



# Exhibit 1 Regional Location Map

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Source: USGS Corona North & Riverside West 7.5' Quadrangles / T03S, R06W, sec3. Kimley-Horn, 01/10/2025.



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**Legend**

- Project Site 9.88 acres
- Off-site Improvement Area 0.36 acre

Source: Bing Aerial Imagery. Kimley-Horn, 01/10/2025.

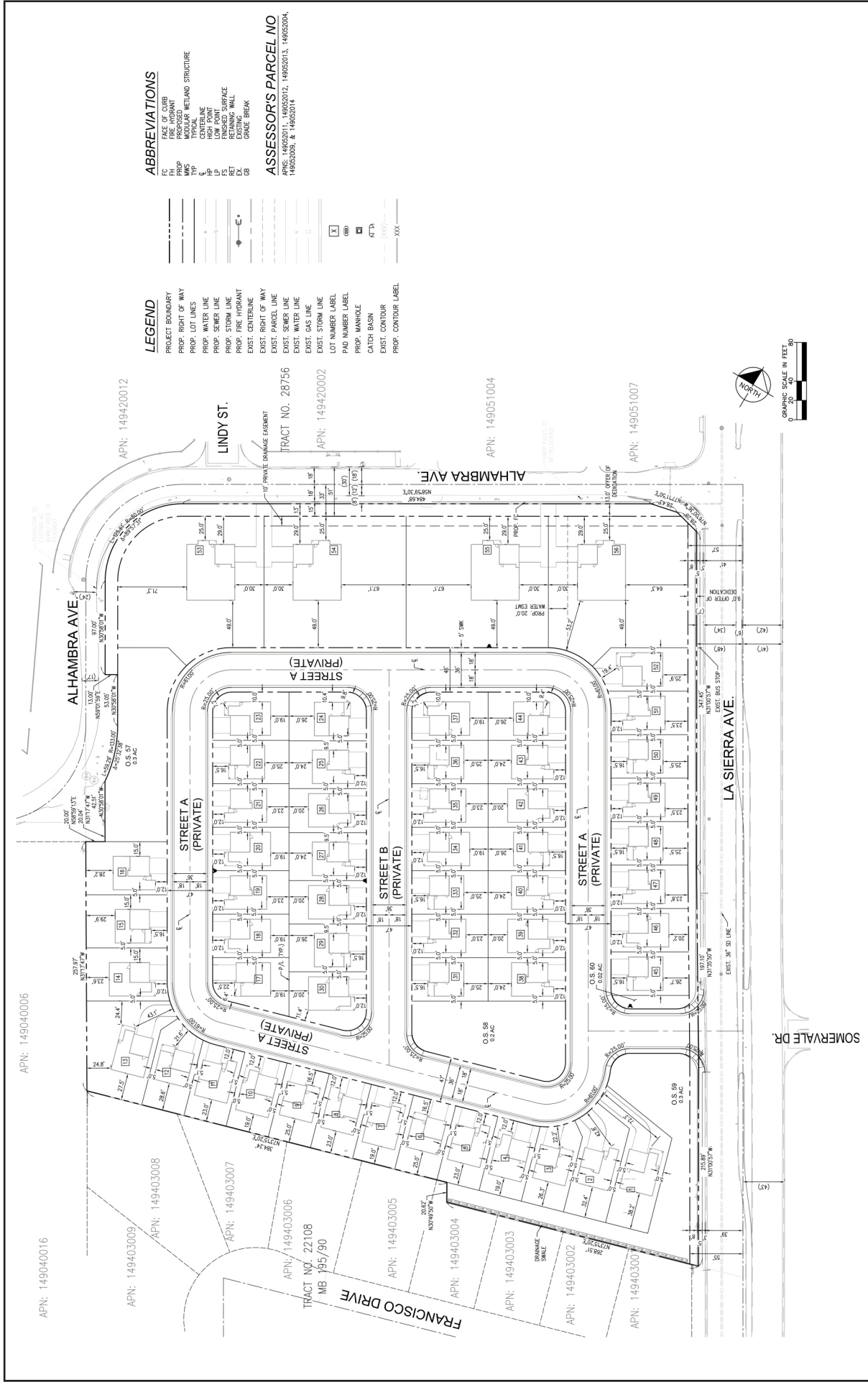


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## Exhibit 3 Local Vicinity Aerial Map

CITY OF RIVERSIDE  
LA SIERRA ALHAMBRA RESIDENTIAL PROJECT  
BIOLOGICAL RESOURCES ASSESSMENT

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**ABBREVIATIONS**

- FC FACE OF CURB
- FH FIRE HYDRANT
- PROSP PROPOSED
- WSP WATER SERVICE PIPING
- TYP TYPICAL
- MOULDER RETAINING STRUCTURE
- PROF. LOT LINES
- PROF. WATER LINE
- PROF. SEWER LINE
- PROF. STORM LINE
- PROF. FIRE HYDRANT
- EXIST. CENTERLINE
- EXIST. RIGHT OF WAY
- EXIST. PARCEL LINE
- EXIST. SEWER LINE
- EXIST. WATER LINE
- EXIST. GAS LINE
- EXIST. STORM LINE
- LOT NUMBER LABEL
- PAD NUMBER LABEL
- PROP. MANHOLE
- CATCH BASIN
- EXIST. CONTOUR
- PROP. CONTOUR LABEL

**LEGEND**

- PROJECT BOUNDARY
- PROP. RIGHT OF WAY
- PROP. LOT LINES
- PROP. WATER LINE
- PROP. SEWER LINE
- PROP. STORM LINE
- PROP. FIRE HYDRANT
- EXIST. CENTERLINE
- EXIST. RIGHT OF WAY
- EXIST. PARCEL LINE
- EXIST. SEWER LINE
- EXIST. WATER LINE
- EXIST. GAS LINE
- EXIST. STORM LINE
- LOT NUMBER LABEL
- PAD NUMBER LABEL
- PROP. MANHOLE
- CATCH BASIN
- EXIST. CONTOUR
- PROP. CONTOUR LABEL

**ASSESSOR'S PARCEL NO**  
 APNS: 149052011, 149052012, 149052013, 149052004,  
 149052005, & 149052014

**Exhibit 4  
 Site Plan**

CITY OF RIVERSIDE  
 LA SIERRA ALHAMBRA RESIDENTIAL PROJECT  
 BIOLOGICAL RESOURCES ASSESSMENT

Source: Kimley Horn, June 2024.



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## 2 - REGULATORY SETTING

### 2.1 - Federal

#### 2.1.1 - Endangered Species Act

The United States Fish and Wildlife Service (USFWS) has jurisdiction over species listed as threatened or endangered under the Endangered Species Act. Section 9 of the Endangered Species Act protects listed species from “take,” which is broadly defined as actions taken to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct.” The Endangered Species Act protects threatened and endangered plants and animals and their critical habitat. Candidate species are those proposed for listing; these species are usually treated by resource agencies as if they were listed during the environmental review process.

A proposed project may acquire permission to take listed and candidate species through implementation of sections of the Endangered Species Act. If the proposed project is funded by, authorized by, or otherwise involves a federal agency, Section 7 requires those agencies to consult with the USFWS to ensure that any proposed project or action would not jeopardize the future existence of any listed species. The consultation results in either a concurrence letter from USFWS stating that the proposed action does not jeopardize the species or a Biological Opinion issued by USFWS that includes a defined limit of take of listed species that is authorized for the action. When there is no federal nexus to pursue Section 7 permissions, USFWS may authorize take of listed species through Section 10, which allows private landowners, corporations, Native American Tribes, states, cities, and counties to implement projects that could affect listed species. Under this process, the project proponent seeks take permissions through completing and submitting for approval a Habitat Conservation Plan (HCP) approved by the USFWS. The HCP defines the proposed project and potential for take of species and outlines measures to mitigate or compensate for impacts that would occur during implementation of the proposed project. Often a draft Implementing Agreement (IA) is included with the permit application for larger HCPs, such as a regional plan. An IA is a contract that describes the roles and responsibilities of the permit holder, the federal wildlife agency, and any other parties responsible for implementing the HCP.

#### 2.1.2 - Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) implements international treaties between the United States and other nations devised to protect migratory birds, their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping unless expressly authorized in the regulations or by permit. All migratory birds and their nests are protected from take and other impacts under the MBTA (16 United States Code [USC] § 703, *et seq.*).

### 2.1.3 - Bald and Golden Eagle Protection Act

The golden eagle (*Aquila chrysaetos*) and bald eagle (*Haliaeetus leucocephalus*) are afforded additional protection under the Eagle Protection Act, amended in 1973 (16 USC § 669, *et seq.*) and the Bald and Golden Eagle Protection Act (16 USC §§ 668–668d).

### 2.1.4 - Clean Water Act

#### Section 404

The agencies are in receipt of the U.S. Supreme Court’s May 25, 2023, decision in the case of *Sackett v. Environmental Protection Agency*. In light of this decision, the agencies will interpret the phrase “waters of the United States” consistent with the Supreme Court’s decision in the *Sackett* case. In *Sackett*, the Supreme Court adopted the Rapanos plurality’s test for adjacent wetlands: only those wetlands with a continuous surface connection to other regulated waters, such that the two are indistinguishable.

The United States Army Corps of Engineers (USACE) administers Section 404 of the federal Clean Water Act (CWA), which regulates the discharge of dredge and fill material into waters of the United States. The term “waters of the United States” is defined in accordance with the USACE regulations at 33 Code of Federal Regulations Part 328.3(a) as:

1. Waters which are:
  - a. Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
  - b. The territorial seas; or
  - c. Interstate waters;
2. Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (a)(5) of this section;
3. Tributaries of waters identified in paragraphs (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;
4. Wetlands adjacent to the following waters:
  - a. Waters identified in paragraph (a)(1) of this section; or
  - b. Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;
5. Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section.

The following are not “waters of the United States”:

1. Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;

2. Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with the United States Environmental Protection Agency (EPA);
3. Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;
4. Artificially irrigated areas that would revert to dry land if the irrigation ceased;
5. Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;
6. Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;
7. Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and
8. Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.

Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the CWA, the final authority regarding CWA jurisdiction remains with the EPA and/or USACE.

"Wetland" refers to areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and seasonal wetlands. Wetlands are considered jurisdictional if they fall under one of the categories of waters of the United States defined above. The USACE jurisdiction typically extends up to the ordinary high water mark (OHWM).

In general, a USACE permit must be obtained before placing fill in wetlands or other waters of the United States. The type of permit depends on the impacted acreage, the purpose of the proposed fill, and other factors.

### **Section 401**

Section 401 of the CWA states that "any applicant for a federal permit for activities that involve a discharge to waters of the State, shall provide the federal permitting agency a certification from the State in which the discharge is proposed that states that the discharge will comply with the applicable

provisions under the federal Clean Water Act.” Therefore, before the USACE will issue a Section 404 permit, applicants must apply for and receive a Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB).

## 2.2 - State

### 2.2.1 - CEQA Guidelines

The following CEQA Guidelines Appendix G checklist questions serve as thresholds of significance when evaluating the potential impacts of a proposed project on biological resources. Impacts are considered significant if a project would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as being a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or USFWS.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan.

### 2.2.2 - California Endangered Species Act

The State of California enacted the California Endangered Species Act (CESA) in 1984. CESA pertains to State-listed endangered and threatened species. CESA requires State agencies to consult with the CDFW when preparing CEQA documents to ensure that the State lead agency actions do not jeopardize the continued existence of a listed species or result in the destruction or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available (Fish and Game Code [FGC] § 2080). CESA directs agencies to consult with the CDFW on projects or actions that could affect listed species, directs the CDFW to determine whether jeopardy would occur, and allows the CDFW to identify “reasonable and prudent alternatives” to the proposed project consistent with conserving the species. CESA allows the CDFW to authorize exceptions to the State’s prohibition against take of a listed species if the take of a listed species is incidental to carrying out an otherwise lawful project that has been approved under CEQA

(FGC § 2081). Under CESA, the California Fish and Game Commission may authorize taking of candidate species, and the CDFW may recommend that the Commission authorize (or not authorize) the taking of listed or candidate species (FGC § 2084).

## **2.2.3 - California Fish and Game Code**

### **Rare, Threatened, and Endangered Species**

Under CESA, the CDFW has the responsibility for maintaining a list of endangered and threatened species (FGC § 2070). Fish and Game Code Sections 2050 through 2098 outline the protection provided to California's rare, endangered, and threatened species. Fish and Game Code Section 2080 prohibits the taking of plants and animals listed under the CESA, and Fish and Game Code Section 2081 establishes an incidental take permit program for State-listed species. The CDFW maintains a list of "candidate species" which it formally notices as being under review, in addition to the list of endangered or threatened species.

### **Fully Protected Species**

Fish and Game Code Sections 3500–5500 outline protection for fully protected species of mammals, birds, reptiles, amphibians, and fish. Species that are fully protected by these sections may not be taken or possessed at any time. The CDFW cannot issue permits or licenses that authorize the take of any fully protected species except under certain circumstances such as scientific research and live capture and relocation of such species pursuant to a permit for the protection of livestock.

### **Species of Special Concern**

In addition to formal listing under the Endangered Species Act and CESA, some species receive additional consideration by the CDFW and local lead agencies during the CEQA process. Species that may be considered for review are those listed as a "Species of Special Concern." The CDFW maintains lists of Species of Special Concern that serve as species "watch lists." Species with this status may have limited distributions or limited populations and/or the extent of their habitats has been reduced substantially such that their populations may be threatened. Thus, their populations are monitored and they may receive special attention during environmental review. While they do not have statutory protection, they may be considered rare under CEQA and specific protection measures may be warranted. In addition to Species of Special Concern, the CDFW Special Animals List identifies animals that are tracked by the California Natural Diversity Database (CNDDDB) and may be potentially vulnerable but warrant no federal interest and no legal protection.

### **Other Sensitive Species**

Sensitive species that would qualify for listing but are not currently listed are afforded protection under CEQA. CEQA Guidelines Section 15065 (Mandatory Findings of Significance) requires that a substantial reduction in numbers of a rare or endangered species be considered a significant effect. CEQA Guidelines Section 15380 (Rare or Endangered Species) provides for the assessment of unlisted species as rare or endangered under CEQA if the species can be shown to meet the criteria

for listing. Unlisted plant species on the California Native Plant Society (CNPS) List ranked 1A, 1B, 2A, and 2B would typically require evaluation under CEQA.

### **Native Bird Protection**

Sections 3503, 3503.5, and 3513 protect native birds. Under Fish and Game Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any native bird. Under Fish and Game Code Section 3503.5, it is unlawful to take, possess, or destroy any birds in the orders of *Falconiformes* or *Strigiformes* (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird. Under Fish and Game Code Section 3513, it is unlawful to take or possess any native migratory bird as designated in the MBTA except as provided by rules and provisions of the MBTA. Mitigation for avoidance of impacts to nesting birds is typically included in CEQA and other permitting documents to ensure project compliance with these Fish and Game Code Sections.

### **Native Plant Protection Act**

The Native Plant Protection Act of 1977 (NPPA) (FGC § 1900, *et seq.*) prohibits the taking, possessing, or sale within the State of any plants with a State designation of rare, threatened, or endangered (as defined by the CDFW). An exception to this prohibition in the NPPA allows landowners to take listed plant species under specified circumstances, provided that the owners first notify CDFW and give the agency at least 10 days to come and retrieve (and presumably replant) the plants before they are plowed under or otherwise destroyed. Fish and Game Code Section 1913 exempts from take prohibition “the removal of endangered or rare native plants from a canal, lateral ditch, building site, or road, or other right-of-way.” Project impacts to these species are not considered significant unless the species are known to have a high potential to occur within the area of disturbance associated with construction of the proposed project.

### **Lake or Streambed Alteration**

Fish and Game Code Section 1602 requires any entity to notify the CDFW before beginning any activity that “may substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of any river, stream, or lake” or “deposit debris, waste, or other materials that could pass into any river, stream, or lake.” “River, stream, or lake” includes waters that are episodic and perennial and ephemeral streams, desert washes, and watercourses with a subsurface flow. A Lake or Streambed Alteration Agreement will be required if the CDFW determines that project activities may substantially adversely affect fish or wildlife resources through alterations to a covered body of water.

### **Natural Community Conservation Planning Act**

Section 2800 of the California Fish and Game Code establishes the Natural Community Conservation Planning Act (NCCP Act), which allows the CDFW to authorize Natural Community Conservation Plans (NCCPs) to allow take of species listed under CESA and other sensitive species and vegetation communities on a regional scale. The primary objective of the NCCP Act is to conserve covered natural communities and species at the ecosystem scale while accommodating compatible land uses, or covered activities. NCCPs must provide conservation and management of natural communities

and species in perpetuity within the area covered by permits. Each NCCP provides measures necessary to conserve and manage sensitive biological resources, including natural vegetation communities and the plant and wildlife species they support, within a reserve system, while also allowing compatible developments and other projects to take species and habitats under special conditions outside of areas targeted for conservation. NCCPs are different from HCPs because the NCCP Act requires that conservation actions improve the long-term conservation of species, whereas HCPs typically only require avoidance of adverse impacts to species. Additionally, while HCPs can be implemented at a project or regional scale, an NCCP must be applied across regional scales to promote the long-term recovery of species, protection of habitats and natural communities, and maintenance of species diversity at the landscape level.

### **2.2.4 - California Porter-Cologne Water Quality Control Act**

The RWQCB regulates actions that would involve “discharging waste, or proposing to discharge waste, within any region that could affect the waters of the State” (Water Code § 13260(a)), pursuant to provisions of the Porter-Cologne Water Quality Act. “Waters of the State” are defined as “any surface water or groundwater, including saline waters, within the boundaries of the State” (Water Code § 13050(e)).

### **2.2.5 - California State Water Resources Control Board/RWQCB Stormwater Management Permitting**

While federal CWA National Pollutant Discharge Elimination System (NPDES) regulations allow two permitting options for construction-related stormwater discharges (individual permits and General Permits), the State Water Board has elected to adopt only one Statewide Construction General Permit at this time that will apply to all stormwater discharges associated with construction activity, except from those on Tribal Lands, those in the Lake Tahoe Hydrologic Unit, and those performed by the California Department of Transportation (Caltrans).

The Construction General Permit requires all dischargers where construction activity disturbs greater than 1 acre of land or those sites less than 1 acre that are part of a common plan of development or sale that disturbs more than 1 acre of land surface to:

1. Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving off-site into receiving waters.
2. Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation. Achieve quantitatively defined (i.e., numeric) pollutant-specific discharge standards, and conduct much more rigorous monitoring based on the project’s projected risk level.
3. Perform inspections of all BMPs.

## 2.2.6 - California Oak Woodlands Conservation Act (AB 242)

The State of California enacted the California Oak Woodlands Conservation Act (Assembly Bill [AB] 242) in 2001. It established requirements for the preservation and protection of oak woodlands and trees and allocated funding to be managed by the Wildlife Conservation Board that would support a variety of ways to preserve oak woodlands throughout the State. In order to qualify to use these funds, counties were required to adopt an oak woodland conservation management plan. In 2004, Senate Bill (SB) 1334 (Public Resources Code [PRC] § 21083.4) expanded this preservation effort by requiring a county, “in determining whether CEQA requires an environmental impact report, negative declaration, or mitigated negative declaration, to determine whether a project in its jurisdiction may result in a conversion of oak woodlands that will have a significant effect on the environment, and would require the county, if it determines there may be a significant effect to oak woodlands, to require one or more of specified mitigation alternatives to mitigate the significant effect of the conversion of oak woodlands.”

## 2.2.7 - Natural Community Rankings

The CDFW maintains sensitivity rankings of natural vegetation communities in the California Sensitive Natural Communities list.<sup>3</sup> CDFW evaluates natural communities using the NatureServe Heritage Methodology and ranking system, which indicates conservation status of communities accordingly.

- **Rank S1–Critically Imperiled:** At very high risk of extirpation in the jurisdiction due to very restricted range, very few populations or occurrences, very steep declines, severe threats, or other factors.
- **Rank S2–Imperiled:** At high risk of extirpation in the jurisdiction due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.
- **Rank S3–Vulnerable:** At moderate risk of extirpation in the jurisdiction due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.
- **Rank S4–Apparently Secure:** At a fairly low risk of extirpation in the jurisdiction due to an extensive range and/or many populations or occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors.
- **Rank S5–Secure:** At very low or no risk of extirpation in the jurisdiction due to a very extensive range, abundant populations or occurrences, with little to no concern from declines or threats.

Per the CDFW, natural communities ranked S1–S3 are considered Sensitive Natural Communities to be addressed during CEQA review or other environmental review. Not all the natural communities listed on the 2025 CDFW California Natural Community List are ranked; however, all sensitive natural

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<sup>3</sup> California Department of Fish and Wildlife (CDFW). 2025. Natural Communities List, Sacramento. January 2, 2025. Accessed January 8, 2025.

communities are indicated by a “Y” in the Sensitive column, while those that are not considered sensitive are indicated by an “N” in the Sensitive column. Thus, potential impacts to communities ranked S1-S3 and/or marked “Y” in the Sensitive column on the Sensitive Natural Communities list should be analyzed during the preparation of environmental documents pursuant to CEQA as they may meet the definition of Rare or Endangered under the CEQA Guidelines Section 15380 criteria.

The CNDDDB maintains listings of sensitive communities in the database that were entered in the mid-1990s using a previous classification system. CDFW recommends that these “Legacy Sensitive Natural Communities” be classified using the current Manual of California Vegetation (MCV) system and that they be addressed in the environmental review process under the new classification and current sensitivity rankings.

## 2.2.8 - California Native Plant Society Rare Plant Rankings

The CNPS maintains a rank of plant species native to California that have low population numbers, limited distribution, or are otherwise threatened with extinction. This information is published in the Inventory of Rare and Endangered Vascular Plants of California. Following are the definitions of the CNPS ranks:

- **Rank 1A:** Plants presumed extirpated in California and either rare or extinct elsewhere
- **Rank 1B:** Plants Rare, Threatened, or Endangered in California and elsewhere
- **Rank 2A:** Plants presumed extirpated in California but common elsewhere
- **Rank 2B:** Plants rare, threatened, or endangered in California but more common elsewhere
- **Rank 3:** Plants about which more information is needed
- **Rank 4:** Watch List: Plants of limited distribution

Potential impacts to populations of CNPS ranked plants receive consideration under CEQA review. All plants appearing on the CNPS List ranked 1 or 2 are considered to meet the CEQA Guidelines Section 15380 criteria. Rank 3 and 4 plants do not automatically meet this definition. Rank 4 plants do not clearly meet CEQA standards and thresholds for impact considerations.<sup>4</sup>

## 2.2.9 - City of Riverside General Plan 2025

The City of Riverside adopted a General Plan in July 2007, setting the City’s development vision through 2025. The City’s General Plan emphasizes the preservation and enhancement of its diverse biological resources and identifies sensitive vegetation communities within the planning area.

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<sup>4</sup> California Native Plant Society (CNPS). 2020. Considerations for Including the California Rare Plant Rank (CRPR) Four Plant Taxa in CEQA Biological Resource Impact Analysis.

## 2.3 - Habitat Conservation Plans

### 2.3.1 - Western Riverside County Multiple Species Habitat Conservation Plan

The MSHCP serves as a multijurisdictional HCP pursuant to Section 10(a)(1)(B) of the Endangered Species Act and an NCCP pursuant to Fish and Game Code Section 2081.1 that focuses on the conservation of species and habitats in western Riverside County. The MSHCP allows permittees to obtain take of threatened, endangered, and rare plant and animal species covered by the MSHCP. Regulation of take of species is authorized by the USFWS and the CDFW for lawful actions (e.g., public and private projects) in exchange for the assembly and management of a conservation reserve system. The MSHCP covers take of 146 species in the plan area, including 32 that are State and/or federally listed.

The MSHCP area encompasses approximately 1.26 million acres and includes all unincorporated land in Riverside County west of the crest of the San Jacinto Mountains to the Orange County line, inclusive of the jurisdictional areas of the cities of Eastvale, Jurupa Valley, Wildomar, Menifee, San Jacinto, Hemet, Perris, Calimesa, Beaumont, Banning, Moreno Valley, Riverside, Corona, Norco, Canyon Lake, Lake Elsinore, Murrieta, and Temecula. Conservation areas that comprise the reserve system will be assembled from Criteria Area cells that consist of 0.75-section cells of approximately 160 acres, each with specific criteria for conservation.

The Conservation Areas that comprise the reserve system will total 500,000 acres when complete, which is projected to be by 2028. Of the 500,000 acres targeted for conservation, 347,000 were in existing open spaces in Public/Quasi-Public (PQP) Lands at the time the MSHCP was adopted in 2003. These lands are under ownership or management of government agencies and their development is not likely. The County and City permittees are responsible for assembling the remaining 153,000 acres in the reserve system by 2028 through implementing the MSHCP during the development and entitlement process.

## 3 - METHODS

### 3.1 - Literature and Database Reviews

This literature review provides a baseline from which to evaluate potential project impacts on biological resources within the project site and the surrounding area.

#### 3.1.1 - Existing Documentation

As part of the literature review, an FCS Biologist examined existing environmental documentation for the project site and vicinity. This documentation included literature pertaining to MSHCP conservation requirements, habitat requirements of special-status species with the potential to occur in the project vicinity, federal register listings, protocols, and species data provided by USFWS and CDFW or contained within the MSHCP.

#### 3.1.2 - Topographic Maps and Aerial Photographs

An FCS Biologist reviewed current USGS 7.5-minute topographic quadrangle map(s) and aerial photographs as a preliminary analysis of the existing conditions within the project site and immediate vicinity.<sup>5</sup> Information obtained from the topographic maps included elevation, general watershed information, and potential drainage feature locations using Google Earth in conjunction with the United States EPA Watershed Assessment, Tracking, and Environmental Results System (WATERS).<sup>6</sup> Aerial photographs provided a perspective of the current site conditions relative to on-site and off-site land use, plant community locations, and potential locations of wildlife movement corridors.

#### 3.1.3 - Soil Surveys

FCS Biologists reviewed United States Department of Agriculture (USDA) soil surveys<sup>7</sup> to establish if soil conditions on the project site are suitable for occurrence of special-status plant species. The soil surveys provide descriptions of taxonomy, parent material, landform, thickness, arrangement, and other important characteristics. FCS Biologists reviewed characteristics for soils mapped on the project site and habitat requirements for special-status plant species that occur in the project vicinity to determine whether there was potential for these species to occur on the project site.

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<sup>5</sup> United States Geological Survey (USGS). 2025. National Geospatial Program. Website: [https://www.usgs.gov/core-science-systems/national-geospatial-program/us-topo-maps-america?qt-science\\_support\\_page\\_related\\_con=4#qt-science\\_support\\_page\\_related\\_con](https://www.usgs.gov/core-science-systems/national-geospatial-program/us-topo-maps-america?qt-science_support_page_related_con=4#qt-science_support_page_related_con). Accessed January 3, 2025.

<sup>6</sup> United States Environmental Protection Agency (EPA). 2025. Watershed Assessment, Tracking and Environmental Results System (WATERS). Website: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>. Accessed January 3, 2025.

<sup>7</sup> Natural Resources Conservation Service (NRCS). 2025. Web Soil Survey (WSS). United States Department of Agriculture (USDA). Website: <https://websoilsurvey.nrcs.usda.gov/app/>. Accessed January 3, 2025.

### 3.1.4 - Special-status Species Database Search

An FCS Biologist compiled a list of threatened, endangered, and otherwise special-status species previously recorded within the project vicinity based on a search of the USFWS Information for Planning and Consultation (IPaC) database,<sup>8</sup> the CNDDDB, and the CNPS Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California.<sup>9,10</sup> The CNDDDB search focused on species records within 5 and 10 miles of the project site. The CNPSEI search focused on records from the *Corona North, California* USGS 7.5-minute Topographic Quadrangle Map and the eight surrounding quadrangles. The CNDDDB Biogeographic Information and Observation System (BIOS 6) was used to determine distances between species occurrences and the project site.<sup>11</sup>

### 3.1.5 - Assessment of Potential for Occurrence of Special-status Species

The potential for occurrence on the project site was assessed for each of the special-status species identified in the database searches. The assessment of potential for occurrence was based on conditions on the project site, habitat requirements of special-status species, and number of recent (<20 years old) occurrences in the project vicinity. The occurrence potential for each special-status species was classified into one of the following categories:

**No Potential for Occurrence or Absent**—There is no suitable habitat for the species on the project site or the project site is located outside of the known range of the species.

**Low Potential to Occur**—Species is known to occur in the project vicinity (within the nine USGS quadrangle search area); however, there is only poor quality or marginal habitat on the project site.

**Moderate Potential to Occur**—Species is known to occur in the vicinity of the project site (based on recent [within 20 years] CNDDDB or other records within 10 miles of the project site or based on professional expertise specific to the project site or species) and there is marginally or partially suitable habitat on the project site. Alternatively, there is marginally or partially suitable habitat on the project site and the project site is within the known range of the species.

**High Potential to Occur**—Species is known to occur in the vicinity of the project site (based on recent [within 20 years] CNDDDB or other records within 5 miles of the project site or based on professional expertise specific to the project site or species) and there is suitable habitat on the project site.

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<sup>8</sup> United States Fish and Wildlife Service (USFWS). 2025. Information for Planning and Consultation (IPaC). Website: <https://ecos.fws.gov/ipac/>. Accessed January 3, 2025.

<sup>9</sup> California Department of Fish and Wildlife (CDFW). 2025. California Natural Diversity Database (CNDDDB) RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>. Accessed January 3, 2025.

<sup>10</sup> California Native Plant Society (CNPS). 2025. California Native Plant Society Rare and Endangered Plant Inventory. Website: <http://www.rareplants.cnps.org/>. Accessed January 3, 2025.

<sup>11</sup> California Department of Fish and Wildlife (CDFW). 2025. Biogeographic Information and Observation System (BIOS 6). Website: <https://wildlife.ca.gov/Data/BIOS>. Accessed January 3, 2025.

Alternatively, there is suitable habitat on the project site and the project site is within the known range of the species.

**Present**—Species is known to occur on the project site based on recent (within 20 years) CNDDDB or other records and there is suitable habitat present on the project site or the species was observed on the project site during the field survey(s).

### 3.1.6 - Trees and Native Vegetation

Prior to conducting the reconnaissance-level field survey, an FCS Biologist reviewed applicable City ordinances pertaining to tree and native vegetation preservation and protection and ascertained whether measures or permits are required to remove, replace, or transplant protected trees or native vegetation.

### 3.1.7 - Jurisdictional Waters and Wetlands

Prior to conducting the reconnaissance-level survey, an FCS Biologist reviewed EPA WATERS and aerial photography to identify potential natural drainage features and water bodies.<sup>12</sup> In general, all surface drainage features identified as blue-line streams on USGS maps and linear patches of vegetation are expected to exhibit evidence of flow and be considered potentially subject to State and federal regulatory authority as waters of the United States and/or State. A preliminary assessment was conducted to determine the location of any existing drainages and limits of project-related grading activities to aid in determining whether a formal delineation of waters of the United States or State is necessary. A formal jurisdictional delineation is provided in a separate report.

### 3.1.8 - MSHCP Information Map

As part of the MSHCP Consistency Analysis, an FCS Biologist reviewed the Regional Conservation Authority (RCA) MSHCP Information Map to identify MSHCP wildlife and plant species survey areas for the parcels that comprise the project site and the limits of Criteria Cells, Cell Groups, and MSHCP Conservation Areas in the vicinity of the project site. The website was also reviewed to.<sup>13</sup>

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<sup>12</sup> United States Environmental Protection Agency (EPA). 2025. Watershed Assessment, Tracking and Environmental Results System (WATERS). Website: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>. Accessed January 3, 2025.

<sup>13</sup> Regional Conservation Authority (RCA). 2025. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Information Map. Website: <https://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=2b9d4520bd5f4d35add35fb58808c1b7>. Accessed January 3, 2025.

## 3.2 - Field Surveys

### 3.2.1 - General Biological Survey

The objective of the general biological survey was to ascertain general site conditions and identify whether existing vegetation communities provide suitable habitat for special-status plant or wildlife species, including burrowing owls. During this survey, the Biologist walked and drove the project site and characterized and mapped vegetation communities, identified and recorded plants and wildlife observed on-site, and recorded evidence of wildlife habitats, including wildlife corridors, nests, dens, or burrows. Special-status or unusual biological resources identified during the literature review were ground-truthed during the field survey for mapping accuracy. Special attention was paid to sensitive habitats and areas potentially supporting special-status floral and faunal species.

#### Vegetation Communities and Plants

Common plant species observed during the general biological survey were identified by visual characteristics and morphology in the field and recorded in a field notebook and on field maps. Uncommon and unfamiliar plants were identified with the use of taxonomical guides, including Jepson eFlora and Calflora.<sup>14,15</sup> Taxonomic nomenclature used in this study follows The Jepson Manual: Vascular Plants of California.<sup>16</sup> Common plant names, when not available from The Jepson Manual, were taken from other regionally specific references. Vegetation community types and boundaries were noted on aerial photos, verified through field observation, and digitized using Esri ArcGIS software® ArcMap 10.0. By incorporating collected field data and interpreting aerial photography, a map of habitat types, land cover types, and other biological resources within the project site was prepared. Vegetation community and land cover types used to help classify habitat types are based on the CNPS Manual of California Vegetation (MCV) and cross-referenced with the CDFW Natural Communities List.<sup>17,18,19</sup>

#### Wildlife

Wildlife species detected during the general biological survey by sight, calls, tracks, scat, or other signs were recorded. Notations were made regarding suitable habitat for those special-status species

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<sup>14</sup> Jepson Flora Project (eds.) 2025. Jepson eFlora. Website: <https://ucjeps.berkeley.edu/eflora/>. Accessed January 3, 2025.

<sup>15</sup> Calflora. 2025. Calflora: Information on California plants for education, research, and conservation. Website: <http://www.calflora.org/>. Accessed January 3, 2025.

<sup>16</sup> Baldwin, B., et al. 2012. The Jepson Manual: Vascular Plants of California. Berkeley, CA: University of California Press. County of San Bernardino (Bernardino). 2007 (amended 2015).

<sup>17</sup> Sawyer, J.O., T. Keeler-Wolf, and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society, Sacramento.

<sup>18</sup> California Department of Fish and Wildlife (CDFW). 2025. Natural Communities List, Sacramento: California Department of Fish and Wildlife. Website: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>. Accessed January 3, 2025

<sup>19</sup> California Native Plant Society (CNPS). 2025. A Manual of California Vegetation Online. Website: <https://vegetation.cnps.org/>. Accessed January 3, 2025.

determined to have the potential to occur within the project site.<sup>20</sup> Appropriate field guides were used to assist in species identification during surveys, such as Peterson, Reid, and Stebbins.<sup>21,22,23</sup> Online resources such as eBird and California Herps were also consulted as necessary.<sup>24,25</sup>

### **Wildlife Movement Corridors**

Wildlife movement corridors link areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. Urbanization and the resulting fragmentation of open space areas create isolated “islands” of wildlife habitat, forming separated populations. Corridors act as an effective link between populations.

The project site was evaluated for evidence of a wildlife movement corridor during the general biological survey. The scope of the biological resource assessment did not include a formal wildlife movement corridor study utilizing track plates, camera stations, scent stations, or snares. Rather, the focus of this study was to determine whether a change in land use at the project site could have significant impacts on the regional movement of wildlife. Conclusions are based on the information compiled during the literature review, including aerial photographs, USGS topographic maps, and resource maps for the vicinity; the field survey; and professional experience with the desired topography, habitat, and resource requirements of the special-status species potentially utilizing the project site and vicinity.

### **3.2.2 - Burrowing Owl Habitat Assessment**

FCS Biologist conducted a habitat assessment for the burrowing owl on December 20, 2024, for the project site and adjacent areas to evaluate the suitability of on-site habitat for this species. The habitat assessment was conducted on-site and within 500 feet of the project boundary to determine whether any on-site habitats were suitable for supporting occupancy by burrowing owls. The FCS Biologist walked the project site within 500 feet of the project boundary and characterized and mapped vegetation communities, identified and recorded wildlife observed on-site, and searched for suitable habitat for burrowing owls, including open habitats with low-growing and/or spaced vegetation and burrows or other potential cover (e.g., concrete slabs, pipes).

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<sup>20</sup> California Department of Fish and Wildlife (CDFW). 2024. CNDDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>. Accessed January 3, 2025.

<sup>21</sup> Peterson, T.R. 2010. *A Field Guide to Birds of Western North America*, 4th Edition. Boston, MA: Houghton Mifflin Harcourt.

<sup>22</sup> Reid, F. 2006. *A Field Guide to Mammals of North America*, Fourth Edition. Boston, MA: Houghton Mifflin Harcourt.

<sup>23</sup> Stebbins, R.C. 2003. *A Field Guide to Western Reptiles and Amphibians*. Third Edition. Boston, MA: Houghton Mifflin Harcourt.

<sup>24</sup> eBird. 2025. Online bird occurrence database. Website: <http://ebird.org/content/ebird/>. Accessed January 3, 2025.

<sup>25</sup> California Herps. 2025. *A Guide to the Amphibians and Reptiles of California*. Website: <http://www.californiaherps.com/>. Accessed January 3, 2025.

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## 4 - RESULTS

This section summarizes the results of the literature search and general biological reconnaissance survey. The results of the sensitive biological resources database reviews and an analysis for the potential for occurrence of these resources on the project site are presented in Section 5. An analysis of project requirements for MSHCP consistency is presented in Section 6.

### 4.1 - Literature Review

#### 4.1.1 - Environmental Setting

The project site is situated on developed lands in the Riverside region and does not contain any native vegetation communities. The project site is generally flat with an elevation range of 874 feet above mean sea level (AMSL) near the northwestern portion of the project site to 838 feet AMSL near the southeast corner of the project site. The project site is surrounded by residential development and located along La Sierra Avenue.

#### Soils

The Natural Resource Conservation Service (NRCS) Web Soil Survey (WSS) mapped three soil types on the project site, including Arlington fine sandy loam, deep, 2 to 8 percent slopes; Bonsall fine sandy loam, 2 to 8 percent slopes; and Bonsall fine sandy loam, 8 to 15 percent slopes (Exhibit 5).

### 4.2 - Biological Surveys

The following describes the results of the general biological survey of the project site. No focused species surveys were conducted since the project site is not located within a MSHCP species survey area.

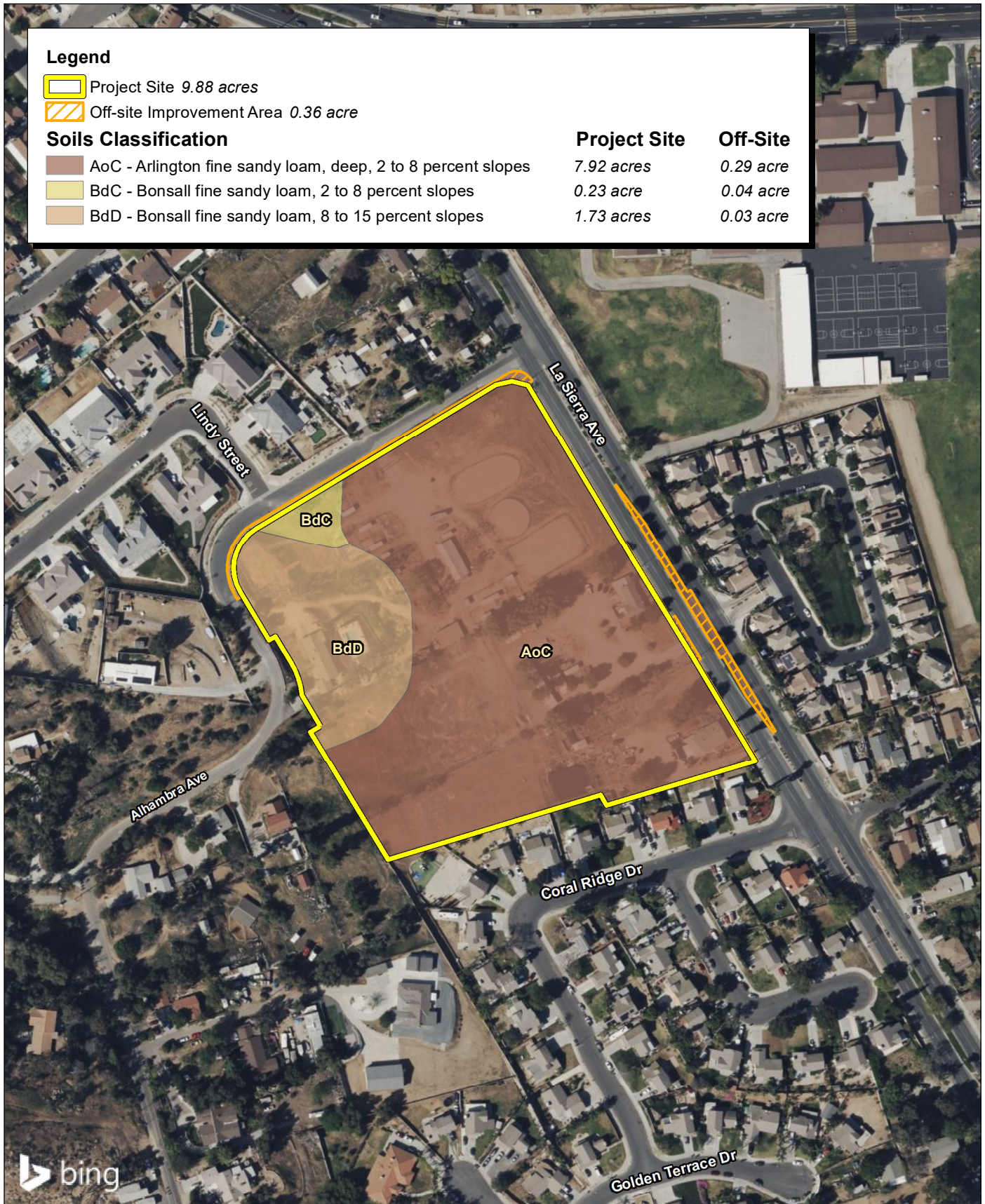
#### 4.2.1 - Survey Personnel

FCS Biologist Joseph Vu conducted a general biological survey on December 20, 2024.

#### 4.2.2 - Vegetation Communities and Land Use

The vegetation communities and land cover types recorded on the project site are described below. A map showing vegetation communities and land cover types is presented in Exhibit 6. Photographs are presented in Appendix A.

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Legend	
	Project Site 9.88 acres
	Off-site Improvement Area 0.36 acre
Soils Classification	
	AoC - Arlington fine sandy loam, deep, 2 to 8 percent slopes
	BdC - Bonsall fine sandy loam, 2 to 8 percent slopes
	BdD - Bonsall fine sandy loam, 8 to 15 percent slopes
Project Site	Off-Site
7.92 acres	0.29 acre
0.23 acre	0.04 acre
1.73 acres	0.03 acre

Source: Bing Aerial Imagery. USDA Soils Data, Riverside County. Kimley-Horn, 01/10/2025.



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Source: Bing Aerial Imagery. Kimley-Horn, 01/10/2025.



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## Ruderal/Bare

Ruderal/bare habitat is present throughout most of the project site in the form of backyards and plots of lands adjacent to the residential homes located on-site. This land cover type is characterized by disturbed, cleared, and/or bare ground that is being invaded by non-native ruderal plant species. This land cover type does not support suitable habitat for special-status plant species.

## Developed

Developed areas are those areas that have been converted to an impervious surface that does not allow for plant growth (e.g., an asphalt road) or have been developed into commercial or residential development. These areas may be vegetated with non-native, ornamental species that are planted associated with developed residential housing or roadways. This land cover type does not support suitable habitat for special-status plant species.

### 4.2.3 - Wildlife

The vegetation community and land cover types on the project site provide habitat for wildlife species that associate with disturbed or ruderal habitat types. The anthropogenic features on and adjacent to the project site (buildings and ornamental trees) could provide habitat for several wildlife species, including nesting birds. Wildlife activity during the general biological reconnaissance survey was low and almost no species were observed. No special-status wildlife species were observed during the survey, nor did the project site contain any suitable habitat for special-status wildlife species.

### 4.2.4 - Special-Status Wildlife Surveys

The project site does not occur within the MSHCP Burrowing Owl Survey Area Narrow Endemic Plant Species Survey Area (NEPSSA), Criteria Area Plant Species Survey Area (CAPSSA), Mammal Survey Area, and/or Amphibian Survey Area. Nor does the project site contain any riparian habitat that could be suitable for MSHCP Section 6.1.2 Riparian/Riverine species such as least Bell's vireo (*Vireo bellii pusillus*), western yellow-billed cuckoo (*Coccyzus americanus*), or southwestern willow flycatcher (*Empidonax traillii extimus*).

### 4.2.5 - Wildlife Movement Corridors

The project site lacks migratory wildlife corridors and/or wildlife nursery sites and does not occur within any MSHCP Cores or Linkages. While some very minor local wildlife movement may occur within the project site, the relatively small size and highly disturbed nature of the project site preclude it from providing migratory wildlife corridors and/or wildlife nursery sites, especially due to the being surrounded by urban development.

### 4.2.6 - Nesting Birds

The project site and adjacent areas contain vegetation and other potential nesting platforms that could provide suitable nesting habitat for bird species protected under the MBTA and the Fish and Game Code.

### **4.2.7 - Burrowing Owl Habitat Assessment**

The project site is surrounded by urban development, has been maintained as a residential property for decades, and does not contain any small mammal burrows, conditions that are not suitable for occupancy by burrowing owls. This species requires large open expanses of sparsely vegetated areas with an abundance of mammal burrows. Typical habitat associated with burrowing owls includes short grasslands, sparse scrublands, agricultural lands, prairies, coastal dunes, desert floors, and some artificial open areas as a year-round resident. Because of the lack of suitable habitat on the project site, the species is not expected to occur on-site, and focused surveys were not conducted for burrowing owls.

### **4.2.8 - Potentially Jurisdictional Water and Wetlands**

The project site does not contain any wetlands, riparian habitat, or other aquatic features that would be regulated under the jurisdiction USACE, RWQCB, CDFW, or MSHCP.

## 5 - ANALYSIS OF POTENTIAL FOR OCCURRENCE OF SENSITIVE BIOLOGICAL RESOURCES

The following section discusses the results of the database reviews for sensitive biological resources and an analysis of the potential for these resources to occur within the project site based on existing biological conditions on and adjacent to the site.

### 5.1 - Sensitive Natural Communities

Sensitive natural communities are vegetation communities or special wildlife habitats that are rare or occur in limited distributions or provide specific habitat requirements for special-status plant or wildlife species. The CDFW maintains a list of natural vegetation communities found in California and ranks them based on rarity. Communities ranked S1–S3 are considered sensitive natural communities.<sup>26</sup> The CNDDDB identified 10 sensitive natural community types California Walnut Woodland, Riversidian Alluvial Fan Sage Scrub, Southern California Arroyo Chub/Santa Ana Sucker Stream, Southern Coast Live Oak Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Interior Cypress Forest, Southern Riparian Forest, Southern Riparian Scrub, Southern Sycamore Alder Riparian Woodland, and Southern Willow Scrub.<sup>27</sup> These vegetation communities are within the previous Holland classification system that CDFW considers “Legacy Sensitive Natural Communities.” Updated MCV classifications of these communities may include classifications that are considered sensitive by CDFW. No sensitive vegetation communities were recorded on or directly adjacent to the project site.

### 5.2 - Special-status Plant Species

Within 10 miles of the project site, 47 special-status plant species have been recorded in the CNDDDB (Exhibit 7)<sup>28,29</sup> on the nine-quadrangle search area of the CNPSEI<sup>30</sup> and in the IPaC query results and were considered in an analysis of their potential to occur on the project site (Appendix B, Table 1). Table 1 in Appendix B includes the legal status of each species, their required habitat, and a summary analysis of the potential for each species to occur on the project site. The potential for occurrence of a

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<sup>26</sup> California Department of Fish and Wildlife (CDFW). 2024. Natural Communities List, Sacramento: California Department of Fish and Wildlife. Accessed January 3, 2025.

<sup>27</sup> California Department of Fish and Wildlife (CDFW). 2025. Biogeographic Information and Observation System (BIOS). Website: <https://wildlife.ca.gov/Data/BIOS>. Accessed January 3, 2025.

<sup>28</sup> California Department of Fish and Wildlife (CDFW). 2025. CNDDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>. Accessed January 3, 2025.

<sup>29</sup> California Department of Fish and Wildlife (CDFW). 2025. Biogeographic Information and Observation System (BIOS 6). Website: <https://wildlife.ca.gov/Data/BIOS>. Accessed January 3, 2025.

<sup>30</sup> California Native Plant Society (CNPS). 2025. California Native Plant Society Rare and Endangered Plant Inventory. Website: <http://www.rareplants.cnps.org/>. Accessed January 3, 2025.

species was based on current biological conditions on the project site and presence of suitable habitats, soil types, and proximity and number of occurrences recorded in the CNDDDB.<sup>31,32,33</sup> Because of the disturbed nature of the project site, no special-status plant species have a potential of occurring.

### 5.3 - Special-status Wildlife Species

Sixty-four special-status wildlife species were identified as occurring within 10 miles of the project site as recorded in the CNDDDB (Exhibit 7)<sup>34,35</sup> or listed in the IPaC query results and were considered in an analysis of their potential to occur on the project site (Appendix B, Table 2). Table 2 in Appendix B includes the legal status of each species, their required habitat types and features, and a summary analysis of the potential for each species to occur on the project site. The potential for wildlife to occur on the project site was based on presence of suitable habitats and proximity and recency of occurrences recorded in the CNDDDB.<sup>36,37</sup> Because of the disturbed nature of the project site, no special-status wildlife species have a potential of occurring.

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<sup>31</sup> California Department of Fish and Wildlife (CDFW). 2025. CNDDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>. Accessed January 3, 2025.

<sup>32</sup> California Native Plant Society (CNPS). 2054. California Native Plant Society Rare and Endangered Plant Inventory. Website: <http://www.rareplants.cnps.org/>. Accessed January 3, 2025.

<sup>33</sup> California Department of Fish and Wildlife (CDFW). 2025. Biogeographic Information and Observation System (BIOS 6). Website: <https://wildlife.ca.gov/Data/BIOS>. Accessed January 3, 2025.

<sup>34</sup> California Department of Fish and Wildlife (CDFW). 2005. CNDDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>. Accessed January 3, 2025.

<sup>35</sup> California Department of Fish and Wildlife (CDFW). 2025. Biogeographic Information and Observation System (BIOS 6). Website: <https://wildlife.ca.gov/Data/BIOS>. Accessed January 3, 2025.

<sup>36</sup> California Department of Fish and Wildlife (CDFW). 2025. CNDDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>. Accessed January 3, 2025.

<sup>37</sup> California Department of Fish and Wildlife (CDFW). 2025. Biogeographic Information and Observation System (BIOS 6). Website: <https://wildlife.ca.gov/Data/BIOS>. Accessed January 3, 2025.