Appendix C: Biological Resources Technical Report

Appendices

This page intentionally left blank.

Biological Resources Technical Report

La Puerta School Site Specific Plan

City of Claremont, Los Angeles County, California

DRAFT REPORT

Portion of Assessor Parcel No. 8670-003-900

Prepared for:

PLACEWORKS
3 MacArthur Place, Suite 1100
Santa Ana, CA 92707
Contact: Jorge Estrada, (714) 966-9220

Prepared by:

Cadre Environmental
701 Palomar Airport Road, Suite 300
Carlsbad, California 92011
Contact: Ruben Ramirez, (949) 300-0212

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

INTRODUCTION

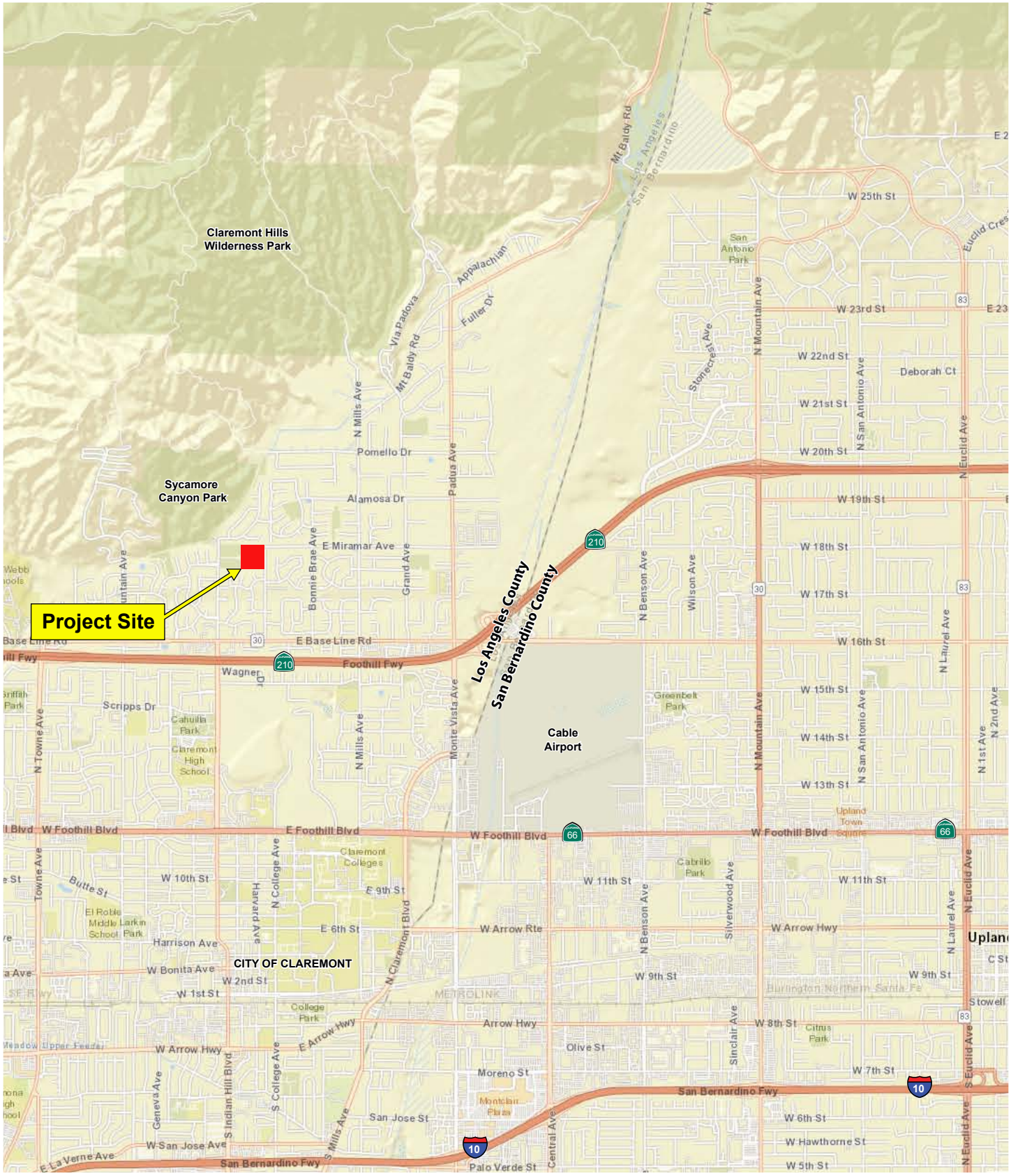
The following biological technical report describes a detailed assessment of potential sensitive natural resources located within and immediately adjacent to the La Puerta School Site Specific Plan Project, including offsite areas which will be disturbed in connection with development of the Project (Project Site). Specifically, the report has been prepared to support the California Environmental Quality Act (CEQA) documentation, compliance and review process conducted by the City of Claremont. As discussed below, the assessment includes a thorough literature review, site reconnaissance characterizing baseline conditions (including floral and faunal and dominate vegetation communities), impact analysis, and proposed mitigation and/or conservation measures.

PROJECT LOCATION & DESCRIPTION

The 9.58-acre Project Site, eastern half of Assessor Parcel Number (APN) 8670-003-900 is located south of the pedestrian access point to the Thompson Creek Trail, west of Forbes Avenue and east of the La Puerta Sports Park, in the City of Claremont, Los Angeles County, California (U.S. Geological Survey (USGS)) 7.5' series Mount Baldy Quadrangle, as shown in Figure 1, *Regional Location Map*, and Figure 2, *Project Site Map*. Additionally, the Project includes 0.63-acre of off-site improvement areas for roadway improvements and sewer line installation. Therefore, the study area for this report and associated physical impact area is 10.21-acres total.

The Project Site is completely devoid of natural undisturbed vegetation communities and is characterized as disturbed/non-native grassland, disturbed, ornamental and developed. A few scattered native laurel sumac (*Malosma laurina*) shrubs and coast live oak (*Quercus agrifolia*) trees are scattered within and adjacent to the ornamental vegetation. The property was previously used as a La Puerta Intermediate School which was closed in 1979, as illustrated in Figure 2, *Project Site Map.* Offsite impact areas where future utilities servicing the property will be placed include the paved bordering reach of Forbes Avenue to the west and the southern region of the La Puerta Sports Park where a sewer line will be installed.

The La Puerta School Site Specific Plan Project proposes the development of 56 single-family detached homes with all associated access, circulation, infrastructure, and hardscape/landscape improvements. The 56 homes would be provided at a density of approximately 5.8 dwelling units per acre and each will include a two-car garage, driveway, and private yard.



Portion of Assessor Parcel No. 8670-003-900

Figure 1 - Regional Location Map
Biological Resources Technical Report
La Puerta School Site Specific Plan C-5

CADRE Environmental

N
not to scale

Figure 2 - Project Site Map
Biological Resources Technical Report
La Puerta School Site Specific Plan

CADRE Environmental

N

1 inch = 200 feet

LITERATURE REVIEW

Existing biological resource conditions within and adjacent to the Project Site were initially investigated through review of pertinent scientific literature. Federal register listings, protocols, and species data provided by the United States Fish and Wildlife Service (USFWS) were reviewed in conjunction with anticipated federally listed species potentially occurring within the Project Site. The California Natural Diversity Database (CNDDB 2022a), a California Department of Fish and Wildlife (CDFW) Natural Heritage Division species account database, was also reviewed for all pertinent information regarding the locations of known occurrences of sensitive species in the vicinity of the property. In addition, numerous regional floral and faunal field guides were utilized in the identification of species and suitable habitats. Combined, the sources reviewed provided an excellent baseline from which to inventory the biological resources potentially occurring in the area. Other sources of information included the review of unpublished biological resource letter reports and assessments. Other CDFW reports and publications consulted include the following:

- Special Animals (CDFW 2022b);
- State and Federally Listed Endangered and Threatened Animals of California (CDFW 2022c);
- Endangered, Threatened, and Rare Plants of California (CDFW 2022d); and
- Special Vascular Plants and Bryophytes List (CDFW 2022e).

FIELD SURVEYS

An initial reconnaissance survey of the Project Site was conducted by Ruben Ramirez, Cadre Environmental in June 2022 in order to characterize and identify potential sensitive plant and wildlife habitats, and to establish the accuracy of the data identified in the literature search and previous surveys. Geologic and soil maps were examined to identify local soil types that may support sensitive taxa. Aerial photograph, topographic maps, and vegetation and rare plant maps prepared by previous studies in the region were used to determine community types and other physical features that may support sensitive plants/wildlife, uncommon taxa, or rare communities that occur within the Project Site, if available. Based on the initial CDFW and USFWS database reviews a habitat assessment was conducted for but not limited to the following target species:

- sensitive plants
- coastal California gnatcatcher (*Polioptila californica californica*), Federally Threated (FT) and California Species of Special Concern (SSC)
- burrowing owl (*Athene cunicularia*). SSC.
- Least Bell's vireo (*Vireo bellii pusillus*), Federally Endangered (FE)/FT
- American peregrine falcon (*Falco peregrinus anatum*) State Fully Protected (SFP)
- Southern California legless lizard (*Anniella stebbinsi*), SSC

Vegetation Communities/Habitat Classification Mapping

Natural community names and hierarchical structure follows the CDFW "List of California Terrestrial Natural Communities" and/or Holland (1986) classification systems, which have been refined and augmented where appropriate to better characterize the habitat types observed onsite when not addressed by the classification systems.

Floristic Plant Inventory

A general plant survey was conducted throughout the Project Site during the initial reconnaissance in a collective effort to identify all species occurring onsite. All plants observed during the survey efforts were either identified in the field or collected and later identified using taxonomic keys. Plant taxonomy follows Hickman (1993). Scientific nomenclature and common names used in this report generally follow Roberts et al. (2004) or Baldwin et al. (2012) for updated taxonomy. Scientific names are included only at the first mention of a species; thereafter, common names alone are used.

Wildlife Resources Inventory

All animals identified during the reconnaissance survey by sight, call, tracks, scat, or other characteristic sign were recorded onto a 1:200 scale orthorectified color aerial photograph or documented using a global positioning system (GPS). In addition to species actually detected, expected use of the site by other wildlife was derived from the analysis of habitats on the site, combined with known habitat preferences of regionally occurring wildlife species. Vertebrate taxonomy followed in this report is according to the Center for North American Herpetology (2022 for amphibians and reptiles), the American Ornithologists' Union (1988 and supplemental) for birds, and Baker et al. (2003) for mammals. Both common and scientific names are used during the first mention of a species; common names only are used in the remainder of the text.

Regional Connectivity/Wildlife Movement Corridors

The analysis of wildlife movement corridors associated with the Project Site and immediate vicinity is based on information compiled from literature, analysis of the aerial photograph and direct observations made in the field during the reconnaissance site visit. A literature review was conducted that includes documents on island biogeography (studies of fragmented and isolated habitat "islands"), reports on wildlife home range sizes and migration patterns, and studies on wildlife dispersal. Wildlife movement studies conducted in southern California were also reviewed. Use of field-verified digital data, in conjunction with the GIS database, allowed proper identification of regional vegetation communities and drainage features. This information was crucial to assessing the relationship of the Project Site to large open space areas in the immediate vicinity and was also evaluated in terms of connectivity and habitat linkages. Relative to corridor issues, the discussions in this report are intended to focus on wildlife movement associated within the Project Site and the immediate vicinity.

Jurisdictional Resources Assessment

A jurisdictional resources assessment was conducted throughout all regions of the Project Site and offsite impact areas by Cadre Environmental in June 2022. The assessment determined the boundaries or absence of potential wetland and non-wetland waters of the United States subject to the regulatory jurisdiction of the U.S. Army Corps of Engineers (USACE) pursuant to Clean Water Act (CWA) Section 404; wetland and non-wetland waters of the State subject to the regulatory jurisdiction of the Regional Water Quality Control Board (RWQCB) pursuant to Clean Water Act (CWA) Section 401 and State Porter-Cologne Water Quality Control Act (Porter-Cologne); streambed and riparian habitat subject to the regulatory jurisdiction of the CDFW pursuant Sections 1600 *et seq*. of the California Fish and Game Code (CDFG Codes).

Wetlands are identified by the presence of three characteristics: hydrophytic vegetation, wetland hydrology, and hydric soils. If any of these criteria were met, one or more transects were run to determine the extent of the wetland. Specifically, the presence of wetland hydrology was evaluated throughout the Project Site by recording the extent of observed surface flows, depth of inundation, depth to saturated soils, and depth to free water in the soil pits, where applicable. In addition, indicators of wetland or riverine hydrology were recorded, including water marks, drift lines, rack, debris, and sediment deposits, as warranted. Any indicators of hydric soils, such as redoximorphic features, buried organic matter, organic streaking, reduced soil conditions, gleyed or low-chroma soils, or sulfidic odor were also recorded.

EXISTING ENVIRONMENTAL SETTING

SURROUNDING LAND USES/TOPOGRAPHY/SOILS

The Project Site is completely devoid of natural undisturbed vegetation communities and is characterized as disturbed/non-native grassland, disturbed, ornamental and developed. A few scattered native laurel sumac shrubs and coast live oak trees are scattered within and adjacent to the ornamental vegetation. The property was previously used as a La Puerta Intermediate School which was closed in 1979, as illustrated in Figure 2, *Project Site Map.* Offsite impact areas where future utilities servicing the property will be placed include the paved bordering reach of Forbes Road to the west and the southern region of the La Puerta Sports Park where a sewer line will be installed, as illustrated in Figure 3, *Vegetation Communities Map* and Figures 4 to 6, *Current Project Site Photographs*. The Soil Survey of Los Angeles County Area has the following soil type mapped within the boundary of the Project Site and offsite improvement areas as shown on Figure 7, *Soils Association Map*:

- Urban land-Soboba complex, 0 to 5 percent slopes, somewhat excessively drained.

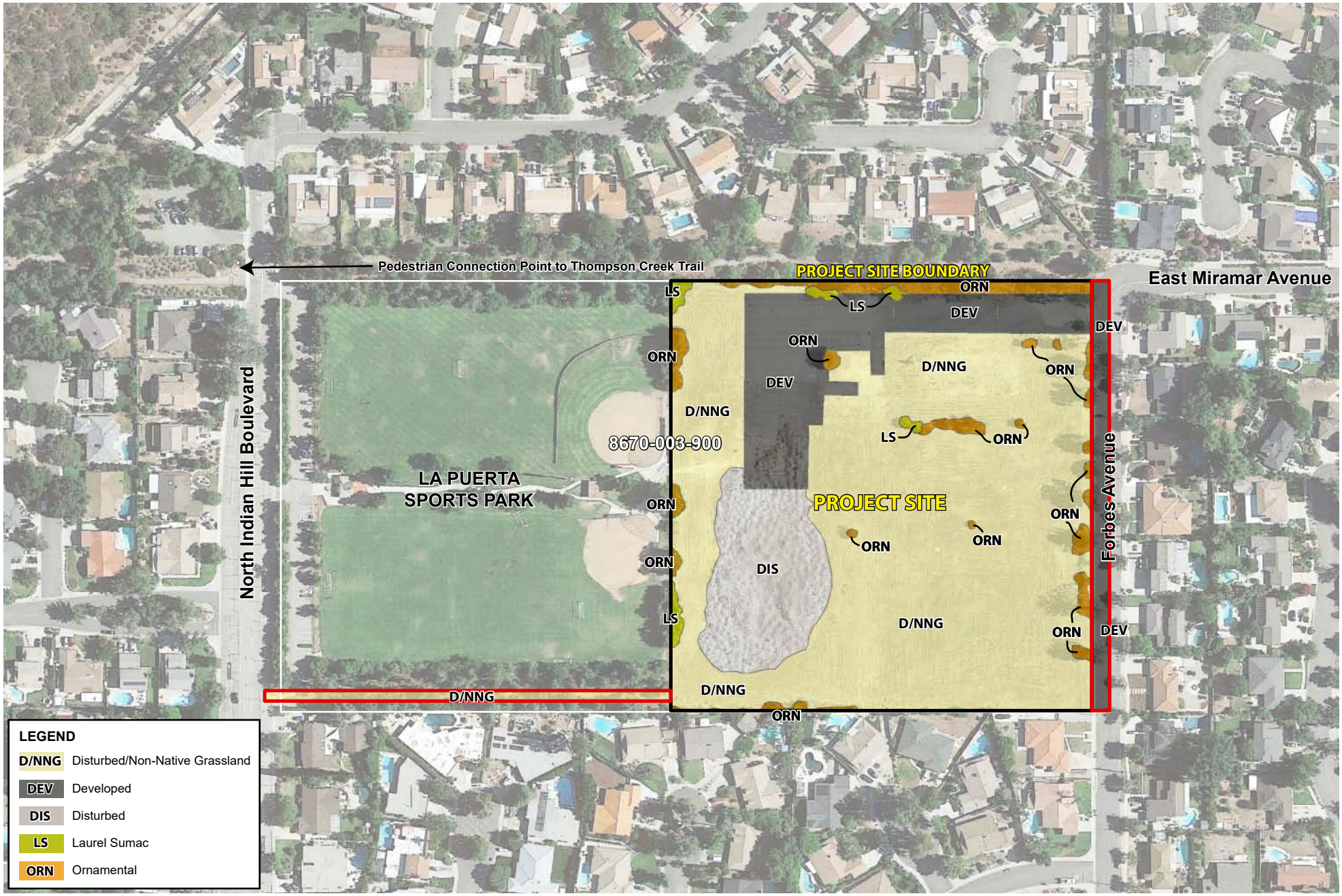


Figure 3 - Vegetation Communities Map
Biological Resources Technical Report
La Puerta School Site Specific Plan

CADRE Environmental

N

1 inch = 200 feet

PHOTOGRAPH 1 - Eastward view of offsite impact area located south of the La Puerta Sports Park where a sewer line will be installed.

PHOTOGRAPH 2 - Westward view of offsite impact area located south of the La Puerta Sports Park where a sewer line will be installed.

Refer to Figure 2 for Photographic Key Map

Figure 4 - Current Project Site Photographs
Biological Resources Technical Report
La Puerta School Site Specific Plan

CADRE Environmental

PHOTOGRAPH 3 - Northeast view of Project Site from southwest corner.

PHOTOGRAPH 4 - Southeast view of Project Site from northwest corner.

Refer to Figure 2 for Photographic Key Map

Figure 5 - Current Project Site Photographs
Biological Resources Technical Report
La Puerta School Site Specific Plan

CADRE Environmental

PHOTOGRAPH 5 - Southwest view of Project Site from northeast corner.

PHOTOGRAPH 6 - Northwest view of Project Site from southeast corner.

Refer to Figure 2 for Photographic Key Map

Figure 6 - Current Project Site Photographs
Biological Resources Technical Report
La Puerta School Site Specific Plan

CADRE Environmental

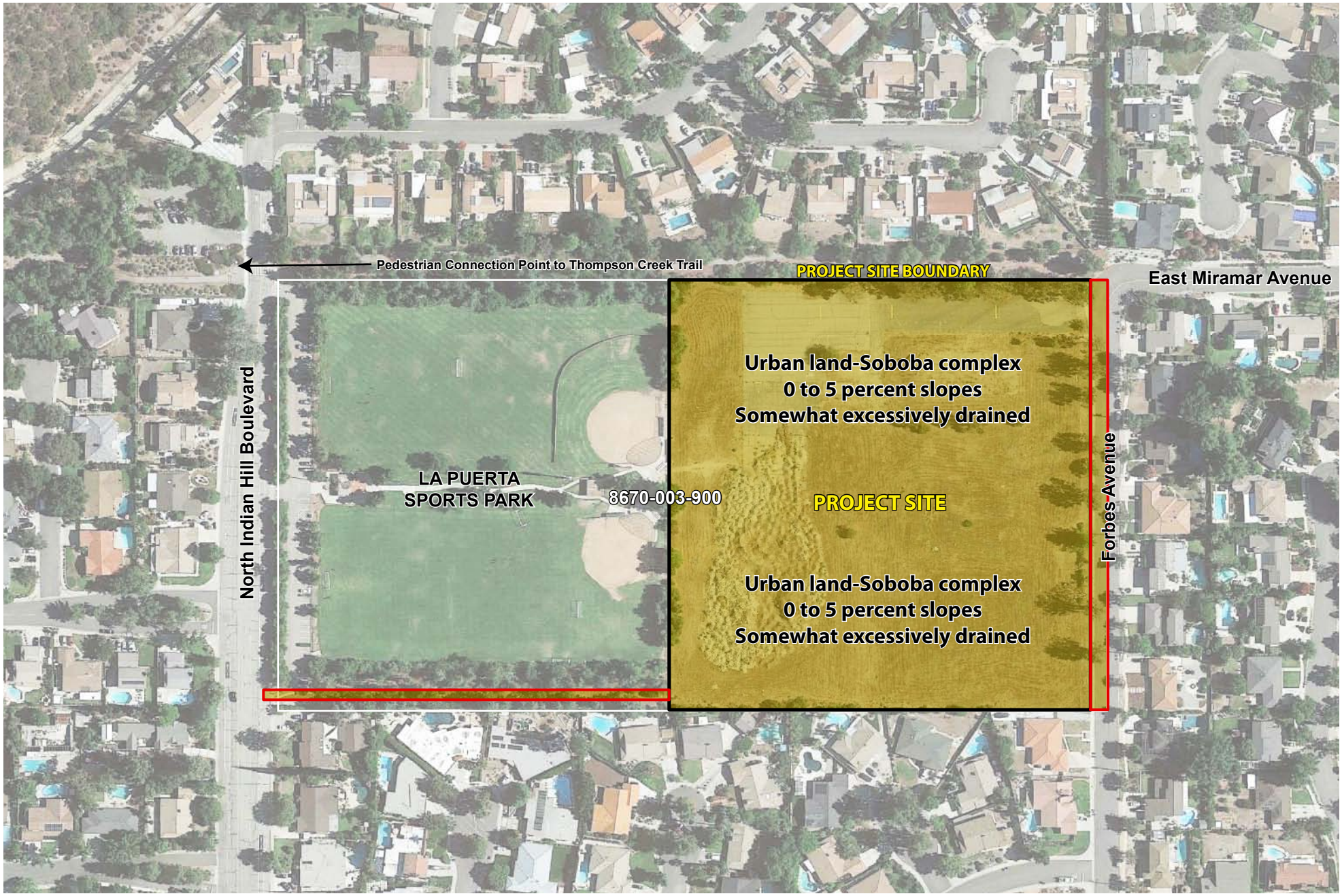


Figure 7 - Soils Association Map
Biological Resources Technical Report
La Puerta School Site Specific Plan

CADRE Environmental

N

1 inch = 200 feet

VEGETATION COMMUNITIES

Natural community names follow the CDFW "List of California Terrestrial Natural Communities" and/or Holland (1986) classification system, which have been refined and where appropriate to better characterize the habitat types onsite when not addressed by the classification systems. Acreage totals for vegetation communities documented onsite and offsite are listed in Table 1. *Vegetation Communities Acreages*.

Table 1.
Vegetation Communities Acreages

*Vegetation Type	Acreage (onsite)	Acres (offsite)	Acres (total)
Disturbed/Non-Native Grassland	6.51	0.00	6.51
Developed	1.44	0.40	1.84
Disturbed	1.05	0.23	1.28
Ornamental	0.49	0.00	0.49
Laurel Sumac (Individual Shrubs)	0.09	0.00	0.09
TOTALS	**9.58**	**0.63**	**10.21**

**Source: Cadre Environmental 2022.*

Disturbed/Non-Native Grassland

Disturbed/Non-native grassland habitats documented onsite are either dominated by ruderal species or equally dominated by ruderal and non-native grassland species. Ruderal invasive species documented within this vegetation community include prickly sow-thistle (*Sonchus asper*), cheeseweed (*Malva parviflora*), black mustard (*Brassica nigra*), horseweed (*Erigeron canadensis*), tocalote (*Centaurea melitensis*), red-stemmed filaree (*Erodium cicutarium*), prickly lettuce (*Lactuca serriola*), Russian thistle (Salsola tragus), spotted spurge (*Euphorbia maculata*), nettle-leaved goosefoot (*Chenopodium murale*), tumbling pigweed (*Amaranthus albus*), puncture vine (*Tribulus terrestris*), tree tobacco (*Nicotiana glauca*), Italian thistle (*Carduus pycnocephalus*), and orchard nettle (*Urtica urens*).

Native species commonly occurring with disturbed habitats and documented onsite include Jimpson weed (*Datura wrightii*), nightshade (*Solanum douglasii*), western ragweed (*Ambrosia psilostachya*), telegraph weed (*Heterotheca grandiflora*), common fiddleneck (*Amsinckia intermedia*), bicolored lupin (*Lupinus bicolor*), Spanish clover (*Acmispon americanus*), and California cudweed (*Pseudognaphalium californicum*).

Non-native grasses detected within this vegetation type in sub- or codominant distribution include ripgut grass (*Bromus diandrus*), soft chess (*Bromus hordeaceus*), goldentop (*Lamarckia aurea*), Bermuda grass (*Cynodon dactylon*), Common Mediterranean grass (*Schismus barbatus*), hare barley (*Hordeum murinum*), and wild oat (*Avena fatua*).

Developed

Developed regions of the Project Site include the previously paved reaches onsite adjacent to the cleared school buildings, asphalt paved reach of Forbes Avenue and

offsite concrete lined drainage ditch located in the southern region of the La Puerta Sports Park.

Disturbed

The disturbed region of the Project Site includes piles of imported materials including sand, gravels cobbles, boulders and concrete, created in the southwest region of the property. This region is generally devoid of vegetation with the exception of scattered invasive species as noted in the disturbed/non-native grassland description above.

Ornamental

Ornamental trees, palms and shrubs are scattered throughout the Project Site and offsite impact areas located south of the La Puerta Sports Park. Species detected include Peruvian pepper tree (*Schinus molle*), Brazilian pepper tree (*Schinus terebinthifolia*), pine (*Pinus* sp.), olive (*Olea europaea*), ash tree (*Fraxinus* sp.), jade plant (*Crassula ovata*), Mexican fan palm (*Washingtonia robusta*), lemon scented gum (*Corymbia citriodora*), blue gum (*Eucalyptus globulus*), Chinese elm (*Ulmus parvifolia*), oleander (*Nerium* oleander), waxleaf privet (*Ligustrum quihoui*), black lotus (*Robinia pseudoacacia*), and tuna cactus (*Opuntia ficus-indica*).

Laurel Sumac

Several isolated native laurel sumac shrubs are scattered onsite primarily along the northern and western property boundaries. Although a few small coast live oak were also located along the western boundary adjacent to the laurel sumac and ornamental vegetation, no additional native trees, shrubs or vegetation warranting classification as an independent vegetation community were documented within or adjacent to the Project Site.

GENERAL PLANT & WILDLIFE SPECIES

A complete list of plant species documented onsite is included in the vegetation descriptions in the previous section.

General wildlife species documented on site include American kestrel (*Falco sparverius*) red-tailed hawk (*Buteo jamaicensis*), Anna's hummingbird (*Calypte anna*), mourning dove (*Zenaida macroura*), black phoebe (*Sayornis nigricans*), Say's phoebe (*Sayornis saya*), American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), white crowned sparrow (*Zonotrichia leucophrys*), lesser goldfinch (*Spinus psaltria*), house finch (*Haemorhous mexicanus*), and side-blotched lizard (*Uta stansburiana elegans*). A complete list of wildlife species documented onsite is include in Appendix A, Faunal Compendium.

JURISDICTIONAL RESOURCES

No wetlands or jurisdictional resources regulated by the USACE, CDFW, or RWQCB were documented within or adjacent to the Project Site. Specifically, no natural drainages, swales or inundated features are present. Also, no riparian scrub, forest or woodland habitat is located within or adjacent to the Project Site.

SENSITIVE BIOLOGICAL RESOURCES

The following discussion describes the plant and wildlife species present, or potentially present within the property boundaries, that have been afforded special recognition by federal, state, or local resource conservation agencies and organizations, principally due to the species' declining or limited population sizes, usually resulting from habitat loss. Also discussed are habitats that are unique, of relatively limited distribution, or of particular value to wildlife. Protected sensitive species are classified by state and/or federal resource management agencies, or both, as threatened or endangered, under provisions of the state and federal endangered species act. Vulnerable or "at-risk" species that are proposed for listing as threatened or endangered (and thereby for protected status) are categorized administratively as "candidates" by the USFWS. CDFW uses various terminology and classifications to describe vulnerable species. There are additional sensitive species classifications applicable in California. These are described below.

Sensitive biological resources are habitats or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. The CDFW, USFWS, and special groups like the California Native Plant Society maintain watch lists of such resources. For the purpose of this assessment sources used to determine the sensitive status of biological resources are:

Plants: USFWS (2022), CNDDB (CDFW 2022a), CDFW (2022b), CNPS (2022), and Skinner and Pavlik (1994),

Wildlife: California Wildlife Habitat Relationships (2008), USFWS (2022), CNDDB (CDFW 2022a), and CDFW (2022b).

Habitats: CNDDB (CDFW 2022a).

FEDERAL PROTECTION AND CLASSIFICATIONS

The Federal Endangered Species Act of 1973 (FESA) defines an endangered species as "any species that is in danger of extinction throughout all or a significant portion of its range..." Threatened species are defined as "any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to "take" any listed species. "Take" is defined as follows in Section 3(18) of the FESA: "...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Further, the USFWS, through regulation, has interpreted the terms

"harm" and "harass" to include certain types of habitat modification as forms of a "take." These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a federal agency for an action that could affect a federally listed plant and animal species, the property owner and agency are required to consult with USFWS. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants. Recently, the USFWS instituted changes in the listing status of former candidate species. Former C1 (candidate) species are now referred to simply as candidate species and represent the only candidates for listing. Former C2 species (for which the USFWS had insufficient evidence to warrant listing at this time) and C3 species (either extinct, no longer a valid taxon or more abundant than was formerly believed) are no longer considered as candidate species. Therefore, these species are no longer maintained in list form by the USFWS, nor are they formally protected. However, some USFWS field offices have issued memoranda stating that former C2 species are henceforth to be considered Federal Species of Concern. This term is employed in this document but carries no official protections. All references to federally protected species in this report (whether listed, proposed for listing or candidate) include the most current published status or candidate category to which each species has been assigned by USFWS.

For purposes of this assessment, the following acronyms are used for federal status species:

FE	Federal Endangered
FT	Federal Threatened
FPE	Federal Proposed Endangered
FPT	Federal Proposed Threatened
FC	Federal Candidate for Listing

The designation of critical habitat can also have a significant impact on the development of land designated as "*critical habitat*." The FESA prohibits federal agencies from taking any action that will "*adversely modify or destroy*" critical habitat (16 U.S.C. § 1536(a)(2)). This provision of the FESA applies to the issuance of permits by federal agencies. Before approving an action affecting critical habitat, the federal agency is required to consult with the USFWS who then issues a biological opinion evaluating whether the action will "*adversely modify"* critical habitat. Thus, the designation of critical habitat effectively gives the USFWS extensive regulatory control over the development of land designated as critical habitat.

The federal Migratory Bird Treaty Act (MBTA) makes it unlawful to "*take*" any migratory bird or part, nest, or egg of such bird listed in wildlife protection treaties between the United States and Great Britain, the Republic of Mexico, Japan, and the Union of Soviet States. For purposes of the MBTA, "*take*" is defined as to pursue, hunt, capture, kill, or possess or attempt to do the same.

The Bald Eagle and Golden Eagle Protection Act explicitly protects the bald eagle and golden eagle and imposes its own prohibition on any taking of these species. As defined in this act, take means to pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, or molest or disturb. Current USFWS policy is not to refer the incidental take of

bald eagles for prosecution under the Bald Eagle and Golden Eagle Protection Act (16 U.S.C. 668-668d).

STATE PROTECTION AND CLASSIFICATIONS

California's Endangered Species Act (CESA) defines an endangered species as "...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease." The State defines a threatened species as "...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species." Candidate species are defined as "...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list." Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike FESA, CESA does not include listing provisions for invertebrate species.

Article 3, Sections 2080 through 2085, of CESA addresses the taking of threatened or endangered species by stating "No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided..." Under CESA, "take" is defined as "...hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Exceptions authorized by the state to allow "take" require "...permits or memorandums of understanding..." and can be authorized for "...endangered species, threatened species, or candidate species for scientific, educational, or management purposes." Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

Additionally, some sensitive mammals and birds are protected by the State as Fully Protected Mammals or Fully Protected Birds, as described in the California Fish and Game Code, Sections 4700 and 3511, respectively. SSC ("special" animals and plants) listings include special status species, including all state and federal protected and candidate taxa, Bureau of Land Management and US Forest Service sensitive species, species considered to be declining or rare by the CNPS or National Audubon Society, and a selection of species which are considered to be under population stress but are not formally proposed for listing. This list is primarily a working document for the CDFW's CNDDB project. Informally listed taxa are not protected per se but warrant consideration in the preparation of biotic assessments. For some species, the CNDDB is only concerned with specific portions of the life history, such as roosts, rookeries, or nest sites. For the purposes of this assessment, the following acronyms are used for State status species:

SE	State Endangered
ST	State Threatened
SCE	State Candidate Endangered
SCT	State Candidate Threatened
SFP	State Fully Protected
SP	State Protected
SR	State Rare
SSC	California Species of Special Concern
CWL	California Watch List

Nesting birds, including raptors, are protected under California Fish and Game Code Section 3503, which reads, “It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” In addition, under California Fish and Game Code Section 3503.5, “it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto”. Passerines and non-passerine land birds are further protected under California Fish and Game Code 3513. As such, CDFW typically recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by CDFW.

The CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in the State. This organization has compiled an inventory comprised of the information focusing on geographic distribution and qualitative characterization of rare, threatened, or endangered vascular plant species of California (Tibor 2001). The list serves as the candidate list for listing as threatened and endangered by CDFW. The CNPS has developed five categories of rarity (CRPR):

CRPR 1A	Presumed extinct in California.
CRPR 1B	Rare, threatened, or endangered in California and elsewhere.
CRPR 2A	Plants presumed extirpated in California but common elsewhere
CRPR 2B	Plants rare, threatened, or endangered in California but more common elsewhere
CRPR 3	Plants about which we need more information – a review list.
CRPR 4	Species of limited distribution in California (i.e., naturally rare in the wild), but whose existence does not appear to be susceptible to threat.

As stated by the CNPS:

> "*Threat Rank is an extension added onto the California Rare Plant Rank and designates the level of endangerment by a 1 to 3 ranking with 1 being the most endangered and 3 being the least endangered. A Threat Rank is present for all California Rare Plant Rank 1B's, 2's, 4's, and the majority of California Rare Plant Rank 3's. California Rare Plant Rank 4 plants are seldom assigned a Threat Rank of 0.1, as they generally have large enough populations to not have significant threats to their continued existence in California; however, certain conditions exist to make the plant a species of concern and hence be assigned a California Rare Plant Rank. In addition, all California Rare Plant Rank 1A (presumed extinct in California), and some California Rare Plant Rank 3 (need more information) plants, which lack threat information, do not have a Threat Rank extension." (CNPS 2010)*

0.1	Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
0.2	Fairly threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
0.3	Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

SENSITIVE HABITATS

As stated by CDFW:

> "*One purpose of the vegetation classification is to assist in determining the level of rarity and imperilment of vegetation types. Ranking of alliances according to their degree of imperilment (as measured by rarity, trends, and threats) follows NatureServe's Heritage Methodology, in which all alliances are listed with a G (global) and S (state) rank. For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled*" (CDFW 2012)

No vegetation communities listed by CDFW as sensitive were documented within or adjacent to the Project Site or offsite impact area.

SENSITIVE PLANTS

No state or federally listed threatened or endangered plant species were detected or are expected to occur onsite. No other CNPS, special-status plants, or species of local concern were observed or expected to occur onsite as outlined in Table 2, *Sensitive Plant Species with Potential to Occur Onsite*. The Project Site is completely devoid of natural undisturbed vegetation communities and is characterized as disturbed/non-native grassland, disturbed, ornamental and developed.

Table 2.
Sensitive Plant Species with Potential to Occur Onsite.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
San Gabriel manzanita (*Arctostaphylos glandulosa* ssp. *gabrielensis*) CRPR List 1B.2	Perennial evergreen shrub generally blooming in March. It crows in chaparral vegetation with rocky substrates (CNPS 2022)	Not Detected
Davidson's saltscale (*Atriplex serenana* var. *davidsonii*) CRPR List 1B.2	Davidson's saltscale is a decumbent to ascending annual that is sparsely scaly. It blooms April to October. It grows on coastal bluffs and alkaline alluvial terraces, and on alkali or saline flats in interior areas (CNPS 2022).	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed alkali soils or vegetation communities.
Nevin's barberry (*Berberis nevinii*) CRPR 1B.1 FE/SE	Perennial evergreen shrub which generally blooms from February to June within chaparral, cismontane woodland, coastal scrub, and riparian scrub in sandy, gravelly substrates (CNPS 2022)	Not Detected
Slender mariposa lily (*Calochortus clavatus* var. *gracilis*) CRPR List 1B.2	Perennial bulbiferous herb which generally blooms from March to June within chaparral, coastal scrub, and valley and foothill grassland habitats. (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.
Plummer's mariposa-lily (*Calochortus plummerae*) CRPR 4.2	Perennial bulbiferous herb which generally blooms from May to June within chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and grassland habitats with granite and rocky substrates. (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.
Parry's spineflower (*Chorizanthe parryi* var. *parryi*) CRPR 1B.1	Annual herb which generally blooms from April to June within chaparral, cismontane woodland, coastal scrub and grassland habitats with sandy and/or rocky openings (CNPS 2022).	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Slender-horned spineflower (*Dodecahema leptoceras*) CRPR 1B.1 FE/SE	Annual herb which generally blooms from April to June within chaparral, cismontane woodland and coastal scrub (alluvial fan) with sandy substrates. (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.
Many-stemmed dudleya (*Dudleya multicaulis*) CRPR 1B.2	Perennial herb which generally blooms from April to July within chaparral, coastal scrub and valley and foothill grassland often associated with clay substrates. (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed clay soils or vegetation communities.
Round-leaved filaree (*Erodium macrophyllum*) CRPR List 2.1	Habitats include open areas in cismontane woodland and valley and foothill grasslands, which are often associated with heavy clay soils below 3,600 feet elevation.	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed clay soils or vegetation communities.
Mesa horkelia (*Horkelia cuneata ssp. puberula*) CRPR 1B.1	Perennial herb which generally blooms from February to September within chaparral (maritime), cismontane woodland and coastal scrub with sandy or gravelly substrates. (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.
California satintail (*Imperata brevifolia*) CRPR List 1B.2	Perennial rhizomatous herb blooming from September to May in chaparral, coastal scrub, Mojavean desert scrub, meadows and seeps (often alkali), and riparian scrub habitats in association with mesic conditions (CNPS 2022).	Not detected
Robinson's pepper-grass (*Lepidium virginicum var. robinsonii*) CRPR 4.3	Annual herb which generally blooms from January to July within chaparral and coastal sage scrub habitats. (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.
Lemon lily (*Lilium parryi*) CRPR 1B.2	Perennial bulbiferous herb which generally blooms from July to August within lower montane coniferous forest, meadows and seeps, riparian forest, and upper montane coniferous forest (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Hall's monardella (*Monardella macrantha ssp. hallii*) CRPR 1B.3	Perennial rhizomatous herb which generally blooms from June to October within broadleaf upland forest, chaparral, cismontane woodland, lower montane coniferous forest, valley and foothill grassland. (CNPS 2022)	Not detected
White-rabbit tobacco (*Pseudognaphalium leucocephalum*) CRPR 2B.2	Perennial herb which generally blooms from July to August within chaparral, cismontane woodland, coastal scrub, and riparian woodland with sandy or gravelly substrates. (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.
Salt spring checkerbloom (*Sidalcea neomexicana*) CRPR 2.2	Perennial herb which generally blooms from March to June within chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, and playas within alkaline and mesic substrates gravelly substrates. (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed alkali soils or vegetation communities.
San Bernardino aster (*Symphyotrichum defoliatum*) CRPR 1B.2	Perennial rhizomatous herb which generally blooms from July to November near ditches, streams, springs in cismontane woodland, coastal scrub, lower montane coniferous forest, meadows and seeps, marshes and swamps, and valley and foothill grassland (vernally mesic) (CNPS 2022).	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.
Greata's aster (*Symphyotrichum greatae*) CRPR 1B.3	Perennial rhizomatous herb which generally blooms from June to October within broad-leaved upland forest, chaparral, cismontane woodland, lower montane coniferous forest and riparian woodland. (CNPS 2022)	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.
Rigid fringepod (*Thysanocarpus rigidus*)	Annual herb generally blooming from February to May in pinyon and juniper woodland habitats in association with dry, rocky slopes.	Not detected or expected to occur onsite based on a complete lack of suitable undisturbed soils or vegetation communities.

Species Name (*Scientific Name*) Status	Habitat Description	Comments

California Native Plant Society (CNPS): California Rare Plant Rank (CRPR)
CRPR 1A – plants presumed extinct in California
CRPR 1B – plants rare, threatened, or endangered in California, but more common elsewhere
CRPR 2A – plants presumed extirpated in California but common elsewhere
CRPR 2B – plants rare, threatened, or endangered in California but more common elsewhere
CRPR 3 – plants about which we need more information, a review list
CRPR 4 – plants of limited distribution, a watch list
.1 – Seriously endangered in California
.2 – Fairly endangered in California
.3 – Not very endangered in California

Federal (USFWS) Protection and Classification
FE – Federally Endangered
FT – Federally Threatened
FC – Federal Candidate for Listing

State (CDFW) Protection and Classification
SE – State Endangered
ST – State Threatened

Source: Cadre Environmental 2022.

SENSITIVE WILDLIFE

No state or federally listed threatened or endangered wildlife species were detected or are expected to occur onsite. However, suitable foraging and/or breeding habitat for two (2) sensitive species was detected onsite for the California horned lark (*Eremophila alpestris actia*) and sharp-shinned hawk (*Accipiter striatus*), as outlined in Table 3, *Sensitive Wildlife Species with Potential to Occur Onsite*.

Table 3.
Sensitive Wildlife Species with Potential to Occur Onsite.

Species Name (*Scientific Name*) Status	Habitat Description	Comments
AMPHIBIANS		
Arroyo Toad (*Anaxyrus californicus*) FE SSC	The arroyo toad is found in the southern part of the Coast Ranges from northern San Luis Obispo Co. south to Baja California. Its elevation range extends up to 6400 ft (1950 m). This species is found in semi-arid regions near washes or intermittent streams. Habitats used include valley-foothill and desert riparian as well as a	No Potential based on a complete lack of suitable breeding or upland aestivation habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
	variety of more arid habitats including desert wash, palm oasis, and Joshua tree, mixed chaparral and sagebrush.	
Southern mountain yellow-legged frog (*Rana muscosa*) FE/SE CWL	The southern mountain yellow-legged frog is found in sunny river margins, meadow streams, isolated pools, and lake borders. They seldom are found away from water but may cross upland areas in moving between summer and winter habitats.	No Potential based on a complete lack of suitable breeding habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Western spadefoot (*Spea hammondii*) SSC	The western spadefoot population is patchily but widely distributed throughout southern California. Primary habitat for this species includes breeding habitat below 1500 meters (i.e., vernal pools or other standing water that is free of exotic species) with secondary habitats including adjacent chaparral, sage scrub, grassland, and alluvial scrub habitats.	No Potential based on a complete lack of suitable breeding habitat within or adjacent to the Project Site. A review of historic aerials resulted in no indication of onsite inundation. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Coast range newt (*Taricha torosa*) SSC	The coast range newt has narrow habitat requirements, typically restricted to "pools and runs" stream configurations and adjacent upland habitats within the Santa Ana Mountains Bioregion.	No Potential based on a complete lack of suitable breeding habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
REPTILES		
Southern California Legless Lizard (*Anniella stebbinsi*) SSC	Occur primarily in habitats characterized as having loose often sandy substrates in association with vegetative cover, detritus and moist soils.	Not detected or expected to occur onsite based on a complete lack of suitable vegetation communities and undisturbed sandy substrates and moist soils. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Coastal western whiptail (*Aspidoscelis tigris stejnegeri*) SSC	The coastal western whiptail occurs in a wide variety of habitats including coastal sage scrub, desert scrub, Riversidean alluvial fan scrub, woodlands, grasslands, playas, and respective ecotones between these habitats.	Not detected or expected to occur onsite based on a complete lack of suitable vegetation communities. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Two-striped garter snake (*Thamnophis hammondii*) SSC	This highly aquatic snake is primarily found creeks or inundated areas in association with oak woodlands, scrub and riparian habitats.	No Potential based on a complete lack of aquatic features within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Western pond turtle (*Emys marmorata*) SSC	The western pond turtle inhabits slow moving permanent or intermittent streams, small ponds, small lakes, reservoirs, abandoned gravel pits, permanent and ephemeral shallow wetlands, stock ponds, and sewage treatment lagoons.	No Potential based on a complete lack of aquatic features within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Coast horned lizard (*Phrynosoma blainvillii*) SSC	The horned lizard occurs primarily in scrub, chaparral, and grassland habitats in associated with undisturbed sandy substrates.	Not detected or expected to occur onsite based on a complete lack of suitable vegetation communities or undisturbed sandy substrates. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
BIRDS		
Cooper's hawk (*Accipiter cooperii*) SSC	Cooper's hawk is most commonly found within or adjacent to riparian/oak forest and woodland habitats. This uncommon resident of California increases in numbers during winter migration.	Not detected or expected to occur onsite based on a complete lack of suitable foraging habitat within or adjacent to the Project Site.
Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) CWL	Southern California rufous-crowned sparrow is a non-migratory bird species that primarily occurs within sage scrub habitats and to a lesser extent chaparral sub-associations.	Not detected or expected to occur onsite based on a complete lack of suitable breeding or foraging vegetation communities within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Cactus wren (*Campylorhynchus brunneicapillus)* SSC	This species is a rare localized resident that is found in maritime succulent scrub and coastal sage scrub that contain Opuntia thickets.	Not detected or expected to occur onsite based on a complete lack of coastal sage or southern cactus scrub vegetation communities within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Bell's sage sparrow (*Amphispiza belli*) CWL	Bell's sage sparrow is an uncommon to fairly common but localized resident breeder in dry chaparral and coastal sage scrub along the coastal lowlands, inland valleys, and in the lower foothills of local mountains.	Not detected or expected to occur onsite based on a complete lack of coastal sage or chaparral vegetation communities within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Burrowing owls (*Athene cunicularia*) SSC	The burrowing owl uses predominantly open land, including grassland, agriculture (e.g., dry-land farming and grazing areas), playa, and sparse coastal sage scrub and desert scrub habitats. Some breeding burrowing owls are year-round residents and additional individuals from the north may winter in southern California.	Not detected onsite. No burrows larger than 4 inches in diameter or characteristic sign including white-wash, feathers, tracks, or pellets were detected within or adjacent to the Project Site. However, the disturbed region of the Project Site has several piles of concrete debris piles which represent suitable refugia for the species.
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) FT/SE	Western yellow-billed cuckoo prefer, riparian scrub, forest and woodland habitats.	No Potential based on a complete lack of riparian habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
California horned lark (*Eremophila alpestris actia*) SSC	The California horned lark is a common to abundant resident in a variety of open habitats, usually where trees and large shrubs are absent.	Low Potential. The disturbed/non-native grassland represents suitable foraging and breeding habitat for the species.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
White-tailed kite (*Elanus leucurus*) SFP	The white-tailed kite is found in riparian, oak woodlands adjacent to large open spaces including grasslands, wetlands, savannahs and agricultural fields. This non-migratory bird species occurs throughout the lower elevations of California.	Not detected or expected to occur onsite based on a complete lack of breeding habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Southwestern willow flycatcher (*Empidonax traillii extimus*) FE/SE	The southwestern willow flycatcher prefers riparian scrub, forest and woodland habitats.	No Potential based on a complete lack of riparian habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Merlin (*Falco columbarius*) CWL	The merlin occurs as a transient in the spring and fall and may occasionally winter within the area. The species does not breed in the region.	Not detected or expected to occur onsite. The species does not breed in California.
American peregrine falcon (*Falco peregrinus anatum*) SFP	Throughout the species' range, peregrine falcons are found in a large variety of open habitats, including tundra, marshes, seacoasts, savannahs and high mountains. The species nests on cliffs generally over 200 feet in height.	Not detected or expected to occur onsite. No breeding (nesting) habitat is present within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Prairie falcon (*Falco mexicanus*) CWL	Habitat use of the prairie falcon includes annual grasslands to alpine meadows. The prairie falcon is associated primarily with perennial grasslands, savannahs, rangeland, some agricultural fields during the winter season, and desert scrub areas, all typically dry environments of western North American where there are cliffs or bluffs for nest sites.	Not detected or expected to occur onsite. No breeding (nesting) habitat is present within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Yellow-breasted chat (*Icteria virens*) SSC	The yellow-breasted chat is associated with riparian woodland and riparian scrub habitats.	No Potential based on a complete lack of riparian habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Yellow warbler (*Setophaga petechia*) SSC	Habitat characteristics of the yellow warbler are well known to include riparian scrub and forest and woodland.	No Potential based on a complete lack of riparian habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Sharp-shinned hawk (*Accipiter striatus*) CWL	Potential habitat for the sharp-shinned hawk includes montane coniferous forest for potential breeding areas (none have been documented) and riparian scrub, woodland, and forest habitat, oak woodland and forest, chaparral, coastal sage scrub, desert scrub, and alluvial fan sage scrub for foraging.	Low Potential. The disturbed/non-native grassland represents suitable foraging habitat for the species.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Loggerhead shrike (*Lanius ludovicianus*) SSC	Loggerhead shrike prefer open ground for foraging and thick trees and shrubs including sage scrub, chaparral, and desert scrub habitats for nesting.	No Potential based on a complete lack of breeding habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Coastal California gnatcatcher (*Polioptila californica californica*) FT/SSC	The coastal California gnatcatcher is a non-migratory bird species that primarily occurs within sage scrub habitats in coastal southern California dominated by California sagebrush (*Artemisia californica*), and California buckwheat (*Eriogonum fasciculatum*).	No Potential based on a complete lack of coastal sage scrub habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Least Bell's vireo (*Vireo bellii pusillus*) FE/SE	Least Bell's vireo resides in riparian habitats with a well-defined understory including southern willow scrub, mule fat, and riparian forest/woodland habitats.	No Potential based on a complete lack of riparian habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
MAMMALS		
Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax)* SSC	The northwestern San Diego pocket mouse occurs in coastal sage scrub sage scrub/grassland ecotones, chaparral, and desert scrubs at all elevations up to 6,000 feet.	No Potential based on a complete lack of coastal sage scrub/chaparral habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
San Diego desert woodrat (*Neotoma lepida intermedia*) SSC	The San Diego desert woodrat is found throughout the species range in sage scrub and chaparral wherever there are rock outcrops, boulders, and dense undergrowth.	No Potential based on a complete lack of coastal sage scrub/chaparral habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
San Bernardino kangaroo rat (*Dipodomys merriami parvus*) FE/SSC	Prefers alluvial scrub, coastal sage scrub habitats with sandy and gravelly substrates.	No Potential based on a complete lack of coastal sage scrub/alluvial scrub habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Western mastiff bat (*Eumops perotis californicus*) SSC	Western mastiff bats are found in a variety of biotic environments from low desert scrub to chaparral, oak woodland and ponderosa pine.	No Potential based on a complete lack of desert scrub to chaparral, oak woodland and ponderosa pine habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Pallid bat (*Antrozous pallidus*)	The species occurs in a variety of habitats, including coniferous forests, oak woodlands, brushy terrain, rocky canyons, open farmland, and desert. Roosts are selected on the basis of temperature/proximity to foraging habitat. They are generalists in their roosting requirements, using a variety of structures including rock crevices, tree hollows, mines/caves, structures.	No Potential based on a complete lack of foraging and roosting habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Big free-tailed bat (*Nyctinomops macrotis*)	This smaller relative of the western mastiff bat is relatively rare, with a broad and sporadic distribution across the southwestern United States. Preferred roosting habitat appears to be in crevices in cliffs and large boulders, the same as for the western mastiff bat.	No Potential based on a complete lack of foraging and roosting habitat within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.
Los Angeles pocket mouse (*Perognathus longimembris brevinasus*) SSC	The Los Angeles pocket mouse appears to be limited to sparsely vegetated habitat areas in patches of fine sandy soils associated with washes or of aeolian (windblown) origin, such as dunes.	No Potential based on a complete lack of suitable vegetation or soils within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is surrounded by high density residential development and sports park.

Federal (USFWS) Protection and Classification
FE – Federally Endangered
FT – Federally Threatened
FC – Federal Candidate for Listing

State (CDFW) Protection and Classification
SE – State Endangered
ST – State Threatened
SSC – State Species of Special Concern
CWL – California Watch List
SPF – State Fully Protected

Sources: Cadre Environmental 2022.

Critical habitat designations by the USFWS were researched to determine if any of the Project Site is located within USFWS critical habitat. The Project Site does not occur within a designated critical habitat for federally endangered or threatened species.

REGIONAL CONNECTIVITY/WILDLIFE MOVEMENT CORRIDORS

Overview

Wildlife corridors link areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated “islands” of wildlife habitat. In the absence of habitat linkages that allow movement to adjoining open space areas, various studies have concluded that some wildlife species, especially the larger and more mobile mammals, will not likely persist over time in fragmented or isolated habitat areas because they

prohibit the infusion of new individuals and genetic information (MacArthur and Wilson 1967; Soule 1987; Harris and Gallager 1989; Bennett 1990). Corridors effectively act as links between different populations of a species. A group of smaller populations (termed "demes") linked together via a system of corridors is termed a "metapopulation." The long-term health of each deme within the metapopulation is dependent upon its size and the frequency of interchange of individuals (immigration vs. emigration). The smaller the deme, the more important immigration becomes, because prolonged inbreeding with the same individuals can reduce genetic variability. Immigrant individuals that move into the deme from adjoining demes mate with individuals and supply that deme with new genes and gene combinations that increases overall genetic diversity. An increase in a population's genetic variability is generally associated with an increase in a population's health. Corridors mitigate the effects of habitat fragmentation by:

(1) allowing animals to move between remaining habitats, which allows depleted populations to be replenished and promotes genetic diversity;

(2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events (such as fires or disease) will result in population or local species extinction; and

(3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs (Noss 1983; Fahrig and Merriam 1985; Simberloff and Cox 1987; Harris and Gallagher 1989).

Wildlife movement activities usually fall into one of three movement categories: (1) dispersal (e.g., juvenile animals from natal areas, individuals extending range distributions); (2) seasonal migration; and (3) movements related to home range activities (foraging for food or water, defending territories, searching for mates, breeding areas, or cover). A number of terms have been used in various wildlife movement studies, such as "wildlife corridor", "travel route", "habitat linkage", and "wildlife crossing" to refer to areas in which wildlife moves from one area to another. To clarify the meaning of these terms and facilitate the discussion on wildlife movement in this study, these terms are defined as follows:

Travel Route: A landscape feature (such as a ridge line, drainage, canyon, or riparian strip) within a larger natural habitat area that is used frequently by animals to facilitate movement and provide access to necessary resources (e.g., water, food, cover, den sites). The travel route is generally preferred because it provides the least amount of topographic resistance in moving from one area to another; it contains adequate food, water, and/or cover while moving between habitat areas; and provides a relatively direct link between target habitat areas.

Wildlife Corridor: A piece of habitat, usually linear in nature, that connects two or more habitat patches that would otherwise be fragmented or isolated from one another. Wildlife corridors are usually bounded by urban land areas or other areas unsuitable for wildlife. The corridor generally contains suitable cover, food, and/or water to support species and facilitate movement while in the corridor. Larger, landscape-level corridors (often referred to as "habitat or landscape linkages") can provide both transitory and resident habitat for a variety of species.

Wildlife Crossing: A small, narrow area, relatively short in length and generally constricted in nature, that allows wildlife to pass under or through an obstacle or barrier that otherwise hinders or prevents movement. Crossings typically are manmade and include culverts, underpasses, drainage pipes, and tunnels to provide access across or under roads, highways, pipelines, or other physical obstacles. These are often "choke points" along a movement corridor.

Wildlife Movement within Project Site

The Project Site does not represent a regional or local wildlife movement corridor and provides no cover, food, natural unrestricted water courses or habitats that would facilitate movement onsite or between regional open space lands. The Project Site is completely devoid of natural undisturbed vegetation communities, bordered by fencing and is surrounded by high density residential development and the La Puerta Sports Park. A pedestrian connection trail is located immediately north of the Project Site. However, this trail only serves as an access route from high density residential development extending west of the Project Site 1,000 feet to the Thompson Creek Trail. The Thompson Creek trail is located immediately east and adjacent to a concrete channeled and fenced reach of Thompson Creek.

REGIONAL AND REGULATORY SETTING

FEDERAL

Clean Water Act

The Clean Water Act (CWA), Section 401 provides guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Section 401 requires a project operator to obtain a federal license or permit that allows activities resulting in a discharge to waters of the United States to obtain state certification, thereby ensuring that the discharge will comply with provisions of the CWA. The Regional Water Quality Control Board administers the certification program in California. Section 404 establishes a permit program administered by the USACE that regulates the discharge of dredged or fill material into waters of the United States, including wetlands. The USACE implementing regulations are found at 33 CFR 320 and 330. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines, which were developed by the United States Environmental Protection Agency in conjunction with the USACE (40 CFR 230). The guidelines allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts.

Wetland Definition Pursuant to Section 404 of the Clean Water Act

Aquatic resources, including riparian areas, wetlands, and certain aquatic vegetation communities, are considered sensitive biological resources and fall under the jurisdiction of several regulatory agencies. The USACE exerts jurisdiction over waters of the United States, including all waters that are subject to the ebb and flow of the tide; wetlands and

other waters such as lakes, rivers, streams (including intermittent or ephemeral streams), mudflats, sandflats, sloughs, prairie potholes, vernal pools, wet meadows, playa lakes, or natural ponds; and tributaries of the above features. The extent of waters of the United States is generally defined as the portion that falls within the limits of the Ordinary High-Water Mark (OHWM). The OHWM is defined as the "line on the shore established by the fluctuation of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas."

On April 21, 2020 the U.S. Environmental Protection Agency (EPA) and the USACE published the Navigable Waters Protection Rule to define "Waters of the United States" in the Federal Register. The April 2020 definition includes four simple categories of jurisdictional waters, including: (1) the territorial seas and traditional navigable waters; (2) perennial and intermittent tributaries to those waters; (3) certain lakes, ponds and impoundments; and (4) wetlands adjacent to jurisdictional waters.

The April 2020 definition provides clear exclusions for many water features that traditionally have been regulated, such as ephemeral drainages. The April 2020 definition has been formally adopted by EPA and the USACE and was used for this Jurisdictional Delineation.

Wetlands, including swamps, bogs, seasonal wetlands, seeps, marshes, and similar areas, are defined by USACE as "those 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" (33 CFR 328.3[b]; 40 CFR 230.3[t]). Indicators of three wetland parameters (i.e., hydric soils, hydrophytic vegetation, and wetlands hydrology), as determined by field investigation, must be present for a site to be classified as a wetland by USACE (USACE 1987).

It is important to note that the RWQCB definition of wetland was redefined and the new definition went into effect May 28, 2020. The definition of a wetland is as follows: An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation. This RWQCB modified three-parameter definition is similar to the federal definition in that it identifies three wetland characteristics that determine the presence of a wetland: wetland hydrology, hydric soils, and hydrophytic vegetation. Unlike the federal definition, however, the RWQCB wetland definition allows for the presence of hydric substrates as a criterion for wetland identification (not just wetland soils) and wetland hydrology for an area devoid of vegetation (less than 5% cover) to be considered a wetland.

However, if any vegetation is present, then the USACE delineation procedures would apply to the vegetated component (i.e., hydrophytes must dominate). Examples of waters that would be considered wetlands by the RWQCB definition, but not by the federal wetland definition, are non-vegetated wetlands, or wetlands characterized by exposed

bare substrates like mudflats and playas, as long as they meet the three-parameters as described in the RWQCB definition. It is important to note that while the USACE may not designate a feature as a wetland, that feature could be considered a special aquatic site or other water of the U.S. by the USACE and potentially subject to USACE jurisdiction.

STATE

Regional Water Quality Control Board

The RWQCB also has jurisdiction over waters deemed “isolated” or not subject to Section 404 jurisdiction under the Solid Waste Agency of Northern Cook County v. Corps decision. Dredging, filling, or excavation of isolated waters constitutes a discharge of waste to waters of the state and prospective dischargers are required to obtain authorization through an Order of Waste Discharge or waiver thereof from the RWQCB and comply with other requirements of Porter-Cologne Act.

Under Section 401 of the CWA, the local RWQCB must certify that actions receiving authorization under Section 404 of the CWA also meet state water quality standards. The RWQCB requires projects to avoid impacts to wetlands if feasible and requires that projects do not result in a net loss of wetland acreage or a net loss of wetland function and values. Compensatory mitigation for impacts to wetlands and/or waters of the state is required.

CDFW Streambed Alteration Agreement

Waters of the State are regulated by the California Department of Fish and Wildlife (CDFW) through Section 1600 et seq. of the California Fish and Game Code. Section 1600 et seq. requires notifying the CDFW prior to any project activity that might (1) substantially divert or obstruct the natural flow of any river, stream, or lake; (2) substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or (3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. If, after this notification, the CDFW determines that the activity may substantially adversely affect fish and wildlife resources, a Lake or Streambed Alteration Agreement will need to be obtained. CDFW may then place conditions in the Section 1602 Streambed Alteration Agreement to avoid, minimize, and mitigate any potentially significant adverse impacts within CDFW jurisdictional limits.

The limits of Waters of the State are defined as the “body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." Therefore, the limits extend from the channel bed to the top of the bank, with the addition of the canopy of any riparian habitat associated with the watercourse.

LOCAL

City of Claremont City Trees (Chapter 12.26).

The proposed action would not impact trees within the City of Claremont Forbes Avenue right-of-way. If it is determined that the proposed action would result in impacts to City regulated trees, a tree removal permit will be required to comply with the Tree Policy Manual guidelines and will be reviewed by the City of Claremont Director of the Community Services Department to ensure compliance with the City of Claremont City Trees Municipal Code Chapter 12.26. The permit application would include an infectious tree disease management section or a list of preventative measures, developed in consultation with an arborist, to describe how it will be implemented to avoid or reduce the spread of tree insect pests and diseases.

For landscape design, the Specific Plan's landscape concept seeks to unify new development in the Project Area. The Specific Plan calls for the planting of streets trees, some of which are of mature size at installation. Onsite landscaping would include the use of native and naturalized plant materials. The Specific Plan includes a detailed planting palette for the Project Area. The primary goal is to incorporate species that are already well established in Claremont, including a variety of traditional trees and shrubs historically found in the area (Trumark Homes 2022).

City of Claremont General Plan - Open Space, Parkland, Conservation, and Air Quality Element

As outlined below, the proposed project would not conflict with the goals and polies of the City of Claremont's 2006 General Plan Open Space, Parkland, Conservation, and Air Quality Element.

Goals, Policies and Implementation Measures
Preservation of Natural Open Space Resources

Goal 5-1 Maintain unique and diverse open space resources throughout Claremont for the purposes of resource and habitat protection.

The Project Site is completely devoid of natural undisturbed vegetation communities and is characterized as disturbed/non-native grassland, disturbed, ornamental and developed. The property was previously used as a La Puerta Intermediate School which was closed in 1979, as illustrated in Figure 2, *Project Site Map.* Offsite impact areas where future utilities servicing the property will be placed include the paved bordering reach of Forbes Avenue to the west and the southern region of the La Puerta Sports Park where a sewer line will be installed.

Policy 5-1.1 Strive to acquire or otherwise protect open space areas that provide key wildlife corridors, and provide connectivity between habitat areas

The Project Site does not represent a regional wildlife movement corridor and provides no cover, food, natural unrestricted water courses or habitats that would facilitate regional wildlife movement onsite or between regional open space lands. The Project Site is

completely devoid of natural undisturbed vegetation communities, bordered by fencing and is surrounded by high density residential development and the La Puerta Sports Park. A pedestrian connection trail is located immediately north of the Project Site. However, this trail only serves as an access route from high density residential development extending west of the Project Site 1,000 feet to the Thompson Creek Trail. The Thompson Creek trail is located immediately east and adjacent to the concrete channeled and fenced reach of Thompson Creek.

Policy 5-1.2 Work with state and federal agencies to protect areas containing rare or endangered species of plants and animals.

No federal or state threatened or endangered species are expected to occur within or adjacent to the Project Site. The Project Site is completely devoid of natural undisturbed vegetation communities and is characterized as disturbed/non-native grassland, disturbed, ornamental and developed.

Policy 5-1.3 Encourage new development to preserve, where possible, on-site natural elements that contribute to the community's aesthetic character.

The Project Site is completely devoid of natural undisturbed vegetation communities and is characterized as disturbed/non-native grassland, disturbed, ornamental and developed.

Policy 5-1.4 Develop and implement specific management programs for hillside properties and other natural areas acquired by the City. These programs should be based on sound ecological principles and professionally accepted methods to protect and enhance sensitive animal populations and their habitats.

The Project Site is not located within or adjacent to a designated hillside property.

Policy 5-1.5 Minimize disturbances and scarring of ridgelines and other distinctive landforms in the hillsides.

The Project Site is not located within or adjacent to a designated hillside or ridgeline property.

Policy 5-1.6 Encourage the preservation of natural areas so that future generations will have the opportunity to learn first hand about the natural environmental and its importance.

The Project Site is completely devoid of natural undisturbed vegetation communities, bordered by fencing and is surrounded by high density residential development and the La Puerta Sports Park. The property was previously used as a La Puerta Intermediate School which was closed in 1979, as illustrated in Figure 2, *Project Site Map.*

Policy 5-1.7 Preserve the integrity of riparian habitat areas, creek corridors and other drainages that support biological resources, and contribute to the overall health of the watershed through the preservation of native plants and the removal of invasive, non-native plants.

No riparian scrub, forest, woodland habitats or creek and/or drainage features are located within or adjacent to the Project Site.

Policy 5-1.8 Manage limited natural resources to enable future generations to share in the environmental wealth of the Claremont area.

The Project Site is completely devoid of natural undisturbed vegetation communities, bordered by fencing and is surrounded by high density residential development and the La Puerta Sports Park. The property was previously used as a La Puerta Intermediate School which was closed in 1979, as illustrated in Figure 2, *Project Site Map.*

Policy 5-1.9 Minimize impacts to birds by site disturbance activities.

The onsite vegetation including ornamental trees, shrubs and palms represent potential habitat for common nesting bird and raptor species, many of which were documented onsite during the site assessment. Loss of an active nest would conflict with CDFG Codes 3503 & 3513 and MBTA. Implementation of Conservation Measure **BIO-CM2: Nesting Bird and Raptor Preconstruction Surveys** will ensure compliance with the CDFG Codes.

Conservation

Goal 5-12 Conserve and properly manage natural resource for future generations.

Policy 5-12.1 Educate the public on the need for resource conservation and on ways to minimize the use and consumption of limited natural resources to assure that future generations share in the environmental wealth of the Claremont area

City of Claremont directive not associated with the proposed action.

Policy 5-12.2 Consider the environmental impacts of proposed development of natural areas, recognizing the loss of natural resources is irreversible. The environmental analysis shall carefully weigh the cost and benefits of such development.

The Project Site is completely devoid of natural undisturbed vegetation communities, bordered by fencing and is surrounded by high density residential development and the La Puerta Sports Park. The proposed action represents a redevelopment project that would not result in a direct or indirect impact to natural vegetation or sensitive resources.

Policy 5-12.3 Encourage the reuse of already developed properties before developing natural areas.

The Project Site is completely devoid of natural undisturbed vegetation communities, bordered by fencing and is surrounded by high density residential development and the La Puerta Sports Park. The proposed action represents a redevelopment project that would not result in a direct or indirect impact to natural vegetation or sensitive resources.

The property was previously used as a La Puerta Intermediate School which was closed in 1979, as illustrated in Figure 2, *Project Site Map.*

Policy 5-12.4 Implement land use patterns and policies that incorporate smart growth practices including placement of higher densities near transit center also mixed-use development, and encouraging and accommodating pedestrian movement.

The proposed action will comply with all guidelines of the La Puerta School Site Specific Plan following adoption by the City of Claremont.

Policy 5-12.5 Propose the use of public/private partnerships to upgrade existing buildings for energy efficiency, water conservation, and storm water runoff pollution reduction.

The proposed action will comply with all guidelines of the La Puerta School Site Specific Plan and Municipal National Pollution Discharge and Elimination System (NPDES) Permit. As stated by the City of Claremont:

> "*The City of Claremont is included among the 84 incorporated cities that are subject to the requirements of the Los Angeles County Municipal Storm Water (Municipal NPDES Permit) Order No. R4-2012-0175. The goal of the Municipal NPDES Permit is to protect the beneficial uses associated with receiving waters through control measures that eliminate or reduce pollutants in runoff discharges. Because stormwater runoff and discharges from urbanized areas are significant sources of pollutants that can impair water quality and beneficial uses of the receiving water bodies, the City of Claremont (City) has established a Development Planning/Low Impact Development (LID) program to control pollutants from new development and redevelopment projects*." (City of Claremont 2012)

ENVIRONMENTAL IMPACTS

The following sections include an analysis of the direct impacts, indirect impacts, and cumulative effects of the proposed action on sensitive biological resources. This analysis characterizes the project related activities that are anticipated to adversely impact the species, and when feasible, quantifies such impacts. Direct effects are defined as actions that may cause an immediate effect on the species or its habitat, including the effects of interrelated actions and interdependent actions. Indirect effects are caused by or result from the proposed actions, are later in time, and are reasonably certain to occur. Indirect effects may occur outside of the area directly affected by the proposed action.

Cumulative impacts refer to incremental, individual environmental effects of two or more projects when considered together. These impacts taken individually may be minor but may be collectively significant. Cumulative effects include future tribal, local, or private actions that are reasonably certain to occur in the proposal vicinity considered in this report. A cumulative impact to biological resources may occur if a project has the potential to collectively degrade the quality of the environment, substantially reduce the habitat of

wildlife species or cause a population to drop below self-sustaining levels, thereby threatening to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal species.

THRESHOLD OF SIGNIFICANCE

The environmental impacts relative to biological resources are assessed using impact significance criteria which mirror the policy statement contained in the CEQA at Section 21001 (c) of the Public Resources Code. This section reflects that the legislature has established it to be the policy of the state to:

> "*Prevent the elimination of fish and wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities*…"

The following definitions apply to the significance criteria for biological resources:

- "*Endangered*" means that the species is listed as endangered under state or federal law.
- "*Threatened*" means that the species is listed as threatened under state or federal law.
- "*Rare*" means that the species exists in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens.
- "*Region*" refers to the area within southern California that is within the range of the individual species.
- "*Sensitive habitat*" refers to habitat for plants and animals (1) which plays a special role in perpetuating species utilizing the habitat on the property, and (2) without which there would be substantial danger that the population of that species would drop below self-perpetuating levels.
- "*Substantial effect*" means significance loss or harm of a magnitude which, based on current scientific data and knowledge, (1) would cause a species or a native plant or animal community to drop below self-perpetuating levels on a statewide or regional basis or (2) would cause a species to become threatened or endangered.

Impacts to biological resources may result in a significant adverse impact if one or more of the following conditions would result from implementation of the proposed project.

- Have a substantial adverse effect, either directly or through habitat modification, on any endangered, or threatened species, as listed in Tittle 14 of the California Code of Regulations (Sections 670.2 or 670.5) or Title 50, Code of Federal Regulations (Sections 17.11 or 17.12).
- Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, and meets the definition of Section 15380 (b), (c), or (d) of the CEQA Guidelines.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS.

- 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 and wildlife species or with established native resident migratory wildlife corridors, or impede the use of native 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 HCP, NCCP, or other approved local, regional, or state conservation plan.

Also, the determination of impacts has been made according to the federal definition of "*take*". The federal FESA prohibits the "*taking*" of a member of an endangered or threatened wildlife species or removing, damaging, or destroying a listed plant species by any person (including private individuals and private or government entities). The FESA defines "*take*" as "*to harass, harm, pursue, hunt, shoot, would, kill, trap, capture or collect*" an endangered or threatened species, or to attempt to engage in these activities.

DIRECT IMPACTS

Specifically, the biological resources assessment report addresses the following CEQA Environmental Checklist items.

Environmental Issues	**Potentially Significant Impact**	**Less than Significant with Mitigation**	**Less than Significant Impact**	**No Impact**
Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				**X**
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				**X**
c) 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?				**X**

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
d) 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?				**X**
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				**X**
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Native Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				**X**

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

No Impact. The 9.50-acre (0.63-acre offsite impact area) proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any plant or wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. No federal or state endangered species were detected or expected to occur within or adjacent to the Project Site and offsite impact area.

No potential burrowing owl burrows larger than 4 inches in diameter or characteristic sign including white-wash, feathers, tracks, or pellets were detected within or adjacent to the Project Site. However, the disturbed region of the Project Site has several piles of concrete debris with openings which represent suitable refugia for the species. Because the Project Site could be colonized by burrowing owl in the future, a preconstruction survey will be conducted immediately prior to the initiation of construction to ensure the proposed action does not result in a direct or indirect impact to the species (**BIO-CM1, Burrowing Owl Preconstruction Survey**). If burrowing owls are detected onsite during the preconstruction survey, a burrowing owl relocation plan will be developed for the active translocation of individuals as directed by the City of Claremont and wildlife agencies.

As stated by CDFW:

> "*According to eBird (2021), there is a record of a peregrine falcon (Falco peregrinus anatum) sighted directly northwest of the Project site, along Thompson Creek Trail. Peregrine falcon is a species classified as fully protected under CDFW. Direct impacts in the form of habitat loss and indirect impacts in the form of construction noise and ground vibrations may occur and remove potential foraging habitat for this fully protected species. In addition, construction during the breeding season of nesting birds could*

result in the incidental loss of breeding success or otherwise lead to nest abandonment on site and around the Project vicinity, which may be considered take of a fully protected species." (CDFW 2022G)

No breeding habitat for the peregrine falcon is located within or in the region (0.5-mile) to the Project Site. The species nests on cliffs or structures generally over 200 feet in height none of which occur onsite or in the vicinity of the property. The proposed action would not result in a direct impact to the species. Regardless, several of the mature ornamental trees represents potential nesting habitat for common raptor species. Loss of an active raptor nest would conflict with CDFG Codes 3503 & 3513 and MBTA. Implementation of Conservation Measure **BIO-CM2: Nesting Bird and Raptor Preconstruction Surveys** will ensure compliance with the CDFG Codes.

Suitable foraging and/or breeding habitat for two (2) sensitive species was detected onsite including the California horned lark and sharp-shinned hawk, as outlined in Table 3, *Sensitive Wildlife Species with Potential to Occur Onsite*. Implementation of **BIO-CM 2, Nesting Bird and Raptor Preconstruction Survey**, will ensure the proposed action does not result in direct or indirect impacts to the species.

As stated by CDFW:

"*A review of California Natural Diversity Database (CNDDB) indicates an occurrence of southern California legless lizards (Anniella stebbinsi), a designated Species of Special Concern (SSC), within two miles of the Project vicinity. Project activities related to residential construction will require ground disturbing activities such as grading and grubbing, which may result in reptile habitat destruction, causing the death or injury of adults, juveniles, eggs, or hatchlings. Moreover, the Project may remove essential foraging and breeding habitat for the species*." CDFW 2022G)

No suitable habitat for the Southern California legless lizard was documented onsite. The species primarily occurs in habitats characterized as having loose often sandy substrates in association with vegetative cover, detritus and moist soils. The Project Site is completely devoid of natural undisturbed vegetation communities and is characterized as disturbed/non-native grassland, disturbed, ornamental and developed and did no exhibit mesic conditions.

b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS*?

No Impact. No riparian, sensitive or undisturbed native/natural habitats were documented within or adjacent to the Project Site as outlined in Table 4, *Project Site Vegetation Community Impacts,* and Figure 8, *Vegetation Communities Impact Map*.

The Project Site is completely devoid of natural undisturbed vegetation communities and is characterized as disturbed/non-native grassland, disturbed, ornamental and developed. A few scattered native laurel sumac shrubs and coast live oak trees are scattered within and adjacent to the ornamental vegetation. The property was previously

used as a La Puerta Intermediate School which was closed in 1979, as illustrated in Figure 2, *Project Site Map.* Offsite impact areas where future utilities servicing the property will be placed include the paved bordering reach of Forbes Avenue to the west and the southern region of the La Puerta Sports Park where a sewer line will be installed.

Table 4.
Project Site Vegetation Community Impacts

*Vegetation Type	Acreage (onsite)	Acres (offsite)	Impact Acres (total)
Disturbed/Non-Native Grassland	6.51	0.00	6.51
Developed	1.44	0.40	1.84
Disturbed	1.05	0.23	1.28
Ornamental	0.49	0.00	0.49
Laurel Sumac (Individual Shrubs)	0.09	0.00	0.09
TOTALS	**9.58**	**0.63**	**10.21**

Source: Cadre Environmental 2022.

c) *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?*

No Impact. No wetlands or jurisdictional resources regulated by the USACE, CDFW, or RWQCB were documented within or immediately adjacent to the Project Site. Therefore, no mitigation is required or proposed.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The Project Site does not represent a regional wildlife movement corridor and provides no cover, food, natural unrestricted water courses or habitats that would facilitate movement onsite or between regional open space lands. The Project Site is completely devoid of natural undisturbed vegetation communities, bordered by fencing and is surrounded by high density residential development and the La Puerta Sports Park. A pedestrian connection trail is located immediately north of the Project Site. However, this trail only serves as an access route from high density residential development extending west of the Project Site 1,000 feet to the Thompson Creek Trail. The Thompson Creek trail is located immediately east and adjacent to the concrete channeled and fenced reach of Thompson Creek.

The onsite vegetation including ornamental trees, shrubs and palms represents potential habitat for nesting bird and raptor species, many of which were documented onsite during the site assessment. Loss of an active nest would conflict with CDFG Codes 3503 & 3513 and MBTA. Implementation of Conservation Measure **BIO-CM2: Nesting Bird and Raptor Preconstruction Surveys** will ensure compliance with the CDFG Codes.

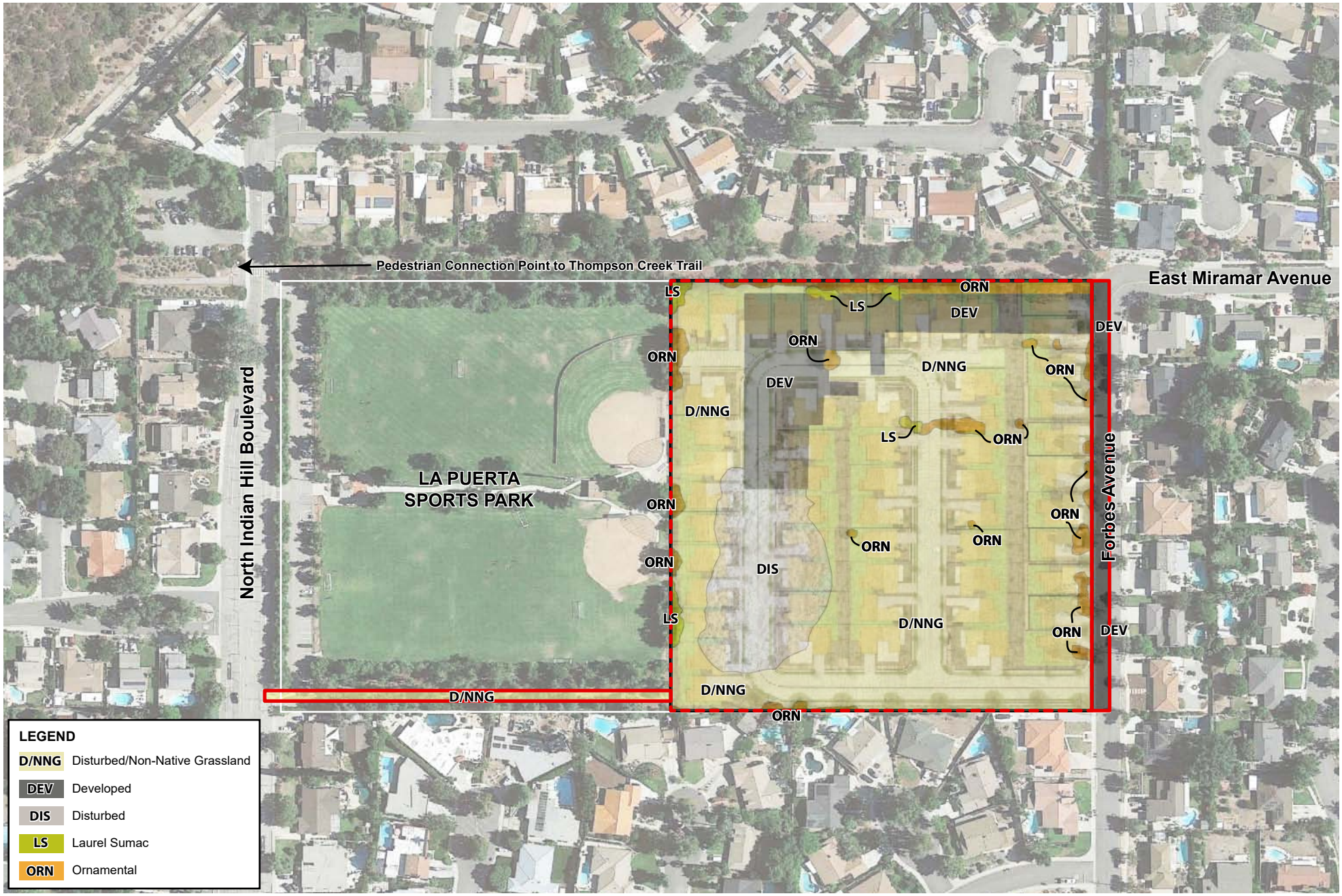


Figure 8 - Project Site Impact Map
Biological Resources Technical Report
La Puerta School Site Specific Plan

CADRE Environmental

N

1 inch = 200 feet

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The proposed action would not impact trees within the City of Claremont Forbes Avenue right-of-way. If it is determined that the proposed action would result in impacts to City regulated trees, a tree removal permit will be required to comply with the Tree Policy Manual guidelines and will be reviewed by the City of Claremont Director of the Community Services Department to ensure compliance with the City of Claremont City Trees Municipal Code Chapter 12.26. The permit application would include an infectious tree disease management section or a list of preventative measures, developed in consultation with an arborist, to describe how it will be implemented to avoid or reduce the spread of tree insect pests and diseases.

For landscape design, the Specific Plan's landscape concept seeks to unify new development in the Project Area. The Specific Plan calls for the planting of streets trees, some of which are of mature size at installation. Onsite landscaping would include the use of native and naturalized plant materials. The Specific Plan includes a detailed planting palette for the Project Area. The primary goal is to incorporate species that are already well established in Claremont, including a variety of traditional trees and shrubs historically found in the area (Trumark Homes 2022).

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Native Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is not located within or adjacent to a Conservation Program Area. Therefore, implementation of the project would not result in a conflict with the provisions of an adopted habitat conservation plan and no impact would occur.

INDIRECT IMPACTS

Potential indirect impacts include hydrological modification, discharges, lighting, and construction noise. Compliance with all the following guidelines will ensure that the proposed project will not result in significant indirect impacts to habitats and associated floral and faunal species outside of the Project Site.

Water Quality

The proposed action will comply with all guidelines of the La Puerta School Site Specific Plan and Municipal NPDES Permit. As stated by the City of Claremont:

> "*The City of Claremont is included among the 84 incorporated cities that are subject to the requirements of the Los Angeles County Municipal Storm Water (Municipal NPDES Permit) Order No. R4-2012-0175. The goal of the Municipal NPDES Permit is to protect the beneficial uses associated with receiving waters through control measures that eliminate or reduce pollutants in runoff discharges. Because stormwater runoff and discharges from urbanized areas are significant sources of pollutants that can impair water quality and beneficial uses of the receiving water bodies, the City of*

Claremont (City) has established a Development Planning/Low Impact Development (LID) program to control pollutants from new development and redevelopment projects." (City of Claremont 2012)

Toxics

Toxic sources within the Project Site would be limited to those commonly associated with residential developments such as pesticides, insecticides, herbicides, fertilizers, and vehicle emissions. In order to mitigate for the potential effects of these toxics, the project will incorporate structural BMPs, as required in association with compliance with the NPDES permit system as warranted, in order to reduce the level of toxins introduced into the drainage system. Water quality measures will be implemented and no significant impacts are anticipated.

Lighting

Impacts related to lighting would be less than significant during both construction and operation. No native open space habitat or wildlife movement corridor are located adjacent to the Project Site and no indirect impacts to wildlife species will occur. The Project Site is completely devoid of natural undisturbed vegetation communities, bordered by fencing and is surrounded by high density residential development and the La Puerta Sports Park.

Noise

Indirect temporal noise impacts may occur to nesting bird species located adjacent to the Project Site during project construction (ornamental landscaping shrubs and trees). Noise and vibration associated with the use of heavy equipment during project construction has the potential to disrupt bird nesting, foraging and breeding behavior within and adjacent to sensitive receptor sites. Conservation Measure **BIO-CM2: Nesting Bird and Raptor Preconstruction Surveys** has been incorporated into the project to collectively contribute to reducing potential indirect noise impacts to nesting bird species located within and adjacent to the Project Site.

CUMULATIVE IMPACTS

The direct and/or indirect impacts of the project would not result in significant cumulative impacts (CEQA Section 15310) to environmental resources within the region of the Project Site. Cumulative impacts refer to incremental effects of an individual project when assessed with the effects of past, current, and proposed projects. The project represents the redevelopment of 9.50-acre of primarily disturbed/non-native grassland habitat, surrounded by existing residential/recreational development, and therefore will not result in an adverse cumulative impact. Impacts related to buildout of the City and Sphere of Influence are anticipated to be less than significant if projects comply with General Plan policies and standard conditions.

No sensitive species or habitats were detected within or adjacent to the Project Site. Therefore, project initiation would not conflict with the general plan policies and standard conditions for the protection of sensitive resources.

The following biological conservation measures addresses the potential adverse impact determined to be potentially significant or are relevant to the protection of biological resources to the extent practicable as part of ensuring all potential impacts are mitigated to a level of less than significant.

BIO-CM1 Burrowing Owl Preconstruction Survey

There is a possibility of owl colonization within the Study Area prior to site grading within the disturbed regions of the property. To ensure that no direct loss of individuals occurs, prior to initiation of on-site grading activities within any phase of the project resulting in direct impacts to disturbed habitat a preconstruction survey will be conducted. The preconstruction survey for burrowing owls shall be conducted by a qualified biologist. The survey shall be conducted 14 days prior to construction activities within the disturbed regions of the phased action area. If ground-disturbing activities are delayed or suspended for more than 14 days after the preconstruction survey, the site shall be resurveyed for owls.

If owls are determined to be present within or adjacent to the phased construction footprint, they shall be captured and relocated. The preconstruction survey and any relocation activity shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, 2012. According to CDFW guidelines, mitigation actions will be conducted from September 1st to January 31st, which is prior to the nesting season. However, burrowing owl nesting activity is variable, and as such the time frame will be adjusted accordingly. Should eggs or fledglings be discovered in any owl burrow, the burrow cannot be disturbed (pursuant to CDFW guidelines) until the young have hatched and fledged (matured to a stage that they can leave the nest on their own). Occupied burrows shall not be disturbed during the nesting season (February 1st through August 31st) unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: a) the adult birds have not begun egg-laying and incubation; or b) the juveniles from the occupied burrows are foraging independently and are capable of independent survival. If a biologist is unable to verify one of the above conditions, then no disturbance shall occur within 300 feet of the burrowing owls nest during the breeding season to avoid abandonment of the young.

BIO-CM 2 Nesting Bird & Raptor Preconstruction Survey

To avoid impacts to nesting birds and raptors within or adjacent to the Project Site and to comply with the CDFG Codes 3503 & 3513, and MBTA, clearing should occur between non-nesting (or non-breeding) season for birds and raptors (generally, September 16th to December 31st). If this avoidance schedule is not feasible, the alternative is to carry out such activities under the supervision of a qualified biologist. This shall entail the following:

A qualified biologist shall conduct a pre-construction nesting bird and raptor survey no more than 14 days prior to initiating ground disturbance activities. The survey will consist of full coverage of the proposed disturbance limits and up to a 500-foot buffer area, determined by the biologist and taking into account the species nesting in the area and the habitat present. If no active nests are found, no additional measures are required.

If "occupied" nests are found, their locations shall be mapped, species documented, and, to the degree feasible, the status of the nest (e.g., incubation of eggs, feeding of young, near fledging) recorded. The biologist shall establish a no-disturbance buffer around each active nest. The buffer area will be determined by the biologist based on the species present, surrounding habitat, and type of construction activities proposed in the area. No construction or ground disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the construction supervisor that activities may resume.

LITERATURE CITED

American Ornithologist Union (AOU). 1998. Check-list of North American Birds. 7th ed. American Ornithologists' Union, Washington, DC.

Baker, R. J., L. C. Bradley, R. D. Bradley, J. W. Dragoo, M. D. Engstrom, R. S. Hoffman, C. A. Jones, F. Reid, D. W. Rice, and C. Jones. 2003. Revised checklist of North American mammals north of Mexico. Occasional Papers of the Museum of Texas Tech University. No. 229: 1-23.

Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken, eds. 2012. The Jepson manual: vascular plants of California, 2nd ed. University of California Press, Berkeley.

Bennett, A. F. 1990. Habitat Corridors: their role in wildlife management and conservation, Department of Conservation and Environment, Melbourne, Australia.

California Department of Fish and Game. 2012. Staff Report on Burrowing Owl Mitigation.

California Department of Fish and Wildlife (CDFW), Natural Diversity Data Base (CNDDB). 2022a. Sensitive Element Record Search for the Mount Baldy Quadrangle. California Department of Fish and Wildlife. Sacramento, California. Accessed June 2022.

California Department of Fish and Wildlife (CDFW). 2022b. Special Animals. Natural Heritage Division, Natural Diversity Data Base.

California Department of Fish and Wildlife (CDFW). 2022c. State and Federally Listed Endangered and Threatened Animals of California. Natural Heritage Division, Natural Diversity Data Base.

California Department of Fish and Wildlife (CDFW). 2022d. Endangered, Threatened, and Rare Plants of California. Natural Heritage Division, Natural Diversity Data Base.

California Department of Fish and Wildlife (CDFW). 2022e. Special Vascular Plants, Bryophytes, and Lichens. Natural Heritage Division, Natural Diversity Data Base.

California Department of Fish and Wildlife (CDFW) 2022f. http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp.

California Department of Fish and Wildlife (CDFW). 2022. Comments on the Notice of Preparation of a Draft Environmental Impact Report for the La Puerta School Site Specific Plan Project, Los Angeles, County, SCH #2022020137.

California Native Plant Society. 2001. Botanical survey guidelines of the California Native Plant Society. Fremontia 29: 64-65.

California Native Plant Society. 2022. Inventory of Rare and Endangered Plants in California, 8th Edition, http://www.cnps.org/cnps/rareplants/inventory/ Accessed [June 2022].

Center for North American Herpetology. 2022. http://www.cnah.org/

City of Claremont. 2012. Developer's Stormwater Compliance Guide for Development and Construction Projects.

City of Claremont. 2006. City of Claremont General Plan – Open Space, Parkland, Conservation, and Air Quality Element.

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1, U.S. Army Engineer Waterways Experimental Station, Vicksburg, Mississippi.

Farhig, L. and G. Merriam. 1985. Habitat patch connectivity and population survival. Ecology 66:1762-1768.

Ferren, W.R., Jr., P.L. Fiedler, R.A. Leidy, K. D. Lafferty, and L. A. K. Mertes. 1996b. Wetlands of California. Part III. Key to the catalogue of wetlands of the central California and southern California coast and coastal watershed. Madroño 32:183-223.

Ferren, W.R., Jr., P.L. Fiedler, and R.A. Leidy. 1996c. Wetlands of California. Part I. History of wetland habitat. Madroño 32:105-124.

Grinnell, J. 1933. Review of the recent mammal fauna of California. Univ. Calif. Publ. Zool. 40:71-234

Hickman, J. C. 1993. The Jepson Manual: Higher Plants of California. Berkeley: University of California Press.

Jepson Flora Project. 2022 (v. 1.0 & supplements). Jepson eFlora. http://ucjeps.berkeley.edu/IJM.html. Accessed June 2022.

Knecht, A. 1971. Soil Survey of Los Angeles Area, California. United States Department of Agriculture, Soil Conservation Service, Washington, DC.

McArthur, R. and Wilson, E. O. 1967. The theory of Island Biogeography. Princeton University Press, 1967.

Noss, R. F. 1983. A regional landscape approach to maintain diversity. BioScience 33:700-706.

Simberloff, D. and J. Cox. 1987. Consequences and cost of conservation corridors. Conservation Biology 1:63-71.

Skinner, M. W. and B. M. Pavlik. 1994. California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California. California Native Plant Society. Special Publication, no. 1, 5th ed. Sacramento, California.

Soil Survey Staff, Natural Resources Conservation Service (NRCS), United States Department of Agriculture (USDA). Web Soil Survey. Available online at http://websoilsurvey.nrcs.usda.gov/. Accessed June 2022.

Trumark Homes. 2022. La Puerta School Site Specific Plan.

United States Fish and Wildlife Service. 2022. Threatened and Endangered Species. Pacific Southwest Region. Carlsbad Office. Available online at http://www.fws.gov/carlsbad/SpeciesStatusList/CFWO_Species_Status_List%20.htm Accessed June 2022

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

Author:_____Date: June 8th, 2022

APPENDIX A

Faunal Compendium

BIRDS

Columbiformes - Pigeons and Doves

Columbidae - Pigeons and Doves

Columba livia ▪ rock pigeon
Zenaida macroura ▪ mourning dove

Apodiformes - Swifts and Hummingbirds

Trochilidae - Hummingbirds

Calypte anna ▪ Anna's hummingbird
Selasphorus sasin ▪ Allen's hummingbird

Accipitriformes - Hawks, Kites, Eagles, and Allies

Accipitridae - Hawks, Kites, Eagles, and Allies

Buteo jamaicensis ▪ red-tailed hawk

Strigiformes - Owls

Tytonidae - Barn Owls

Tyto alba ▪ barn owl

Piciformes - Puffbirds, Jacamars, Toucans, Woodpeckers, and Allies

Picidae - Woodpeckers and Allies

Dryobates nuttallii ▪ Nuttall's woodpecker

Falconiformes - Caracaras and Falcons

Falconidae - Caracaras and Falcons

Falco sparverius ▪ American kestrel

Passeriformes - Passerine Birds

Tyrannidae - Tyrant Flycatchers

Myiarchus cinerascens ▪ ash-throated flycatcher
Sayornis nigricans ▪ black phoebe
Sayornis saya ▪ Say's phoebe
Tyrannus vociferans ▪ Cassin's kingbird

Corvidae - Crows and Jays

Corvus brachyrhynchos ▪ American crow
Corvus corax ▪ common raven

Hirundinidae - Swallows

Stelgidopteryx serripennis ▪ northern rough-winged swallow
Petrochelidon pyrrhonota ▪ cliff swallow

Troglodytidae - Wrens

Troglodytes aedon ▪ house wren

Mimidae - Mockingbirds and Thrashers

Mimus polyglottos ▪ northern mockingbird

Sturnidae - Starlings

Sturnus vulgaris ▪ European starling

Turdidae - Thrushes

Catharus guttatus ▪ hermit thrush
Sialia mexicana ▪ western bluebird

Passeridae - Old World Sparrows

Passer domesticus ▪ house sparrow

Motacillidae - Wagtails and Pipits

Anthus rubescens ▪ American pipit

Fringillidae - Fringilline and Cardueline Finches and Allies

Haemorhous mexicanus ▪ house finch
Spinus psaltria ▪ lesser goldfinch

Passerellidae - New World Sparrows

Melospiza melodia ▪ song sparrow
Melozone crissalis ▪ California towhee
Zonotrichia leucophrys ▪ white-crowned sparrow

Icteridae - Blackbirds

Euphagus cyanocephalus ▪ Brewer's blackbird
Icterus cucullatus ▪ hooded oriole

Parulidae - Wood-Warblers

Setophaga coronata ▪ yellow-rumped warbler

REPTILES

Uta stansburiana elegans ▪ side-blotched lizard

Contact: Ruben S. Ramirez, Jr. 949-300-0212, r.ramirez@cadreenvironmental.com