



CIRCLE K – YUCCA VALLEY PROJECT BIOLOGICAL TECHNICAL REPORT

Yucca Valley, California

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TABLE OF CONTENTS

1 Introduction 1

 1.1 Project Location 1

 1.2 Project Description 1

 1.3 Existing Conditions 1

 1.4 Regulatory Framework 1

2 Methods 7

 2.1 Database Search 7

 2.2 Vegetation Mapping and General Biological Surveys 8

 2.3 Special-Status Species Surveys 9

 2.4 Constraints-Level Aquatic Resources Assessment 10

3 Results 11

 3.1 Physical Setting 11

 3.2 Vegetation Communities and Land Uses 11

 3.3 Plants and Wildlife 13

 Wildlife Corridors 24

 3.5 Potential Federal and State Jurisdictional Aquatic Resources 24

4 Impact Analysis 26

 4.1 Special-Status Plants and Wildlife Impacts 27

 4.2 Native Vegetation Impacts 28

 4.3 Potentially Jurisdictional Aquatic Resources Impacts 29

 4.4 Wildlife Corridor Impacts 30

 4.5 Local Policies and Ordinances Impacts 30

 4.6 Habitat Conservation Plan; Natural Community Conservation Plan; or Other Approved Local, Regional, or State Habitat Conservation Plan Impacts 30

 4.7 Cumulative Impacts 30

5 Mitigation Measures 32

 5.1 Best Management Practices 32

 5.2 Western Joshua Tree Incidental Take Permit 33

 5.3 Burrowing Owl Avoidance and Mitigation Measures 33

 5.4 Nesting Bird Avoidance 34

6 References 36

TABLES

Table 1. CRPR Definitions 8

Table 2. Summary of Vegetation/Land Cover Within the Survey Area and Project Site 11
Table 3. Assessment of Special-Status Plant Species Potential to Occur Within the Project Site.. 14
Table 4. Assessment of Special-Status Wildlife Species Potential to Occur Within the Project Site17
Table 5. Vegetation Communities/Land Cover Project Impacts..... 29

FIGURES

- Figure 1. Project Location
- Figure 2. Biological Resources
- Figure 3a. CNDDDB Plants and Wildlife
- Figure 3b. USFWS Plants and Wildlife
- Figure 4. Soils, National Hydrology Dataset, and National Wetland Inventory
- Figure 5. Proposed Project Impacts

APPENDICES

- Appendix A. Site Photographs
- Appendix B. Plant and Wildlife Species Observed

1 INTRODUCTION

1.1 PROJECT LOCATION

The Circle K-Yucca Valley Project (project or proposed project) consists of approximately 4.3 acres within the Town of Yucca Valley, San Bernardino County, California (Figure 1). The project site is in the eastern portion of Yucca Valley at the northwest corner of 29 Palms Highway and Avalon Avenue. It is bounded by Paxton Road to the north, 29 Palms Highway, Avalon Avenue to the west, and by Diadem Drive and self-storage development to the east. The project site lies within the Yucca Valley North U.S. Geological Survey (USGS) 7.5' quadrangle (USGS 2025), within Sections 31 and 32 of Township 1 North, Range 6 East.

1.2 PROJECT DESCRIPTION

The project proposes the development of a Circle K gas station, a 5,200-square-foot convenience store, and associated parking stalls. The project would feature a fuel canopy with seven fuel pumps. The project would provide 28 parking stalls which would include 18 standard stalls, two accessible stalls, three electric vehicle stalls, one electric vehicle accessible stall, and four electric vehicle capable stalls. The 28 proposed parking stalls would satisfy the 25 required parking stalls per the Town of Yucca Valley Municipal Code. The site plan would include three driveways providing access to the gas station which would each be located on Avalon Avenue, Diadem Drive, and 29 Palms Highway. The proposed site plan encroaches on the Avalon Avenue right-of-way at the southeast section of the project area. As such, the applicant understands that there will be a required right-of-way (ROW) vacation along Avalon Avenue. There will also be a ROW dedication along 29 Palms Highway to accommodate for highway improvements. The existing 12" water main along Avalon Avenue will also need to be relocated. Additionally, the existing parcel will be subdivided with the southern portion being developed for this project and the northern portion remaining undeveloped. The proposed project boundary is 4.3 acres and the off-site improvements include an additional 0.2 acre.

1.3 EXISTING CONDITIONS

The project site is composed of natural and disturbed Joshua tree woodland, as well as disturbed habitat and developed land. Joshua tree woodland habitat is dominant throughout the parcel, and disturbed land extends from the eastern portion through the central site. The topography of the project site is generally flat with minimal elevation change. The project site is bounded by developed land, composed of commercial properties, paved roads and lots, and disturbed habitat.

1.4 REGULATORY FRAMEWORK

Federal, state, and local agencies have established several regulations to protect and conserve biological and aquatic resources. The descriptions below provide a brief overview of agency regulations that may be applicable to the project. The regulating agencies make the final determination as to what types of permits are required.

FEDERAL REGULATIONS

Federal Endangered Species Act

The federal ESA of 1973 (16 U.S.C. § 1531 et seq.), as amended, provides for listing of endangered and threatened species of plants and animals and designation of critical habitat for listed species. The ESA regulates the “take” of any endangered fish or wildlife species, per Section 9. As development is proposed, the responsible agency or individual landowner is required to consult with the U.S. Fish and Wildlife Service (USFWS) to assess potential impacts on listed species (including plants) or their critical habitat, pursuant to Sections 7 and 10 of the ESA. USFWS is required to make a determination as to the extent of impact a project would have on a particular species. If it is determined that potential impacts on a species would likely occur, measures to avoid or reduce such impacts must be identified. USFWS may issue an incidental take statement, following consultation and the issuance of a Biological Opinion. This allows for take of the species that is incidental to another authorized activity, provided that the action will not adversely affect the existence of the species. Section 10 of the ESA provides for issuance of incidental take permits to non-federal parties with the development of a habitat conservation plan (HCP); Section 7 provides for permitting of federal projects.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA; 16 U.S.C. § 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive and listed at 50 Code of Federal Regulations (CFR) 10.13. The USFWS enforces the MBTA, which prohibits “by any means or in any manner, to pursue, hunt, take, capture, [or] kill” any migratory bird, or attempt such actions, except as permitted by regulation.

Clean Water Act

Pursuant to Section 404 of the Clean Water Act (CWA) (33 U.S.C. § 1344), the Corps is authorized to regulate any activity that would result in the discharge of dredged or fill material into waters of the U.S. (including wetlands), which include those waters listed in 33 CFR 328.3 (88 Federal Register [FR] 61964, September 8, 2023; Revised Definition of “Waters of the United States”; Conforming). The Corps, with oversight from the U.S. Environmental Protection Agency (EPA), has the principal authority to issue CWA Section 404 permits. Substantial impacts on waters of the U.S. may require an Individual Permit. Projects that only minimally affect waters of the U.S. may meet the conditions of one of the existing Nationwide Permits.

A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for all Section 404 permitted actions. The Regional Water Quality Control Board (RWQCB), a division of the State Water Resources Control Board, provides oversight of the Section 401 certification process in California. The RWQCBs are required to provide Water Quality Certification for licenses or permits that authorize an activity that may result in a discharge from a point source into a water of the U.S. Water Quality Certification authorization “is limited to assuring that a discharge from a Federally licensed or permitted activity will comply with water quality requirements” (40 CFR 121.3).

The National Pollutant Discharge Elimination System (NPDES) is the permitting program for discharge of pollutants into surface waters of the U.S. under Section 402 of the CWA (33 U.S.C. § 1342).

STATE REGULATIONS

California Environmental Quality Act

The CEQA (California Public Resources Code § 21000 et seq.) was established in 1970 as California's counterpart to the National Environmental Policy Act (NEPA). CEQA requires state and local agencies to identify significant environmental impacts of their actions and to avoid or mitigate those impacts, where feasible.

CEQA applies to certain activities of state and local public agencies. A public agency must comply with CEQA when it undertakes an activity defined by CEQA as a "project." A project is an activity undertaken by a public agency or a private activity, which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency that may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

California Endangered Species Act

The California Endangered Species Act of 1984 (CESA; CFGC § 2050 et seq.), in combination with the California Native Plant Protection Act of 1977 (CFGC § 1900 et seq.), regulates the listing and take of plant and animal species designated as endangered, threatened, or rare within the state. California also lists species of special concern (SSC) based on limited distribution; declining populations; diminishing habitat; or unusual scientific, recreational, or educational value. The California Department of Fish and Wildlife (CDFW) is responsible for assessing development projects for their potential to impact listed species and their habitats. State-listed special-status species are addressed through the issuance of a 2081 permit (Memorandum of Understanding).

California Fish and Game Code Sections 1600-1602

Pursuant to Division 2, Chapter 6, Section 1602 of the CFGC, CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel or bank of any river, stream or lake that supports fish or wildlife. A Lake or Streambed Alteration Agreement Application must be submitted to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake" (CFGC § 1602). CDFW has jurisdiction over riparian habitats associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources. CDFW reviews the proposed actions and, if necessary, submits (to the applicant) a proposal that includes measures to protect affected fish and wildlife resources. The final proposal that is mutually agreed upon by CDFW and the applicant is the Lake or Streambed Alteration Agreement.

California Fish and Game Code Sections 3503, 3511, 3513, 3801, 4700, 5050, and 5515

CDFW protects and manages fish, wildlife, and native plant resources within California. The California Fish and Game Commission and/or CDFW are responsible for issuing permits for the take or possession of protected species. The following sections of the CFGC address protected species: Section 3511 (birds), Section 4700 (mammals), Section 5050 (reptiles and amphibians), and Section 5515 (fish). In addition, the protection of birds of prey is provided for in Sections 3503, 3513, and 3800 of the CFGC.

California Native Plant Protection Act (California Fish and Game Code §§ 1900–1913)

The California Native Plant Protection Act requires all state agencies to use their authority to carry out programs to conserve endangered and rare native plants. The California Native Plant Protection Act prohibits the take of such plants, with certain exceptions.

California Desert Native Plants Act (California Food and Agriculture Code §§ 80001–80201)

The California Desert Native Plants Act prohibits the removal of certain species of California desert native plants on public and privately owned lands without a valid permit from the sheriff or commissioner of the county where collecting would occur. This act applies within the boundaries of Imperial, Inyo, Kern, Los Angeles, Mono, Riverside, San Bernardino, and San Diego Counties.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (California Water Code § 13000 et seq.) provides for statewide coordination of water quality regulations. The State Water Resources Control Board was established as the statewide authority and nine separate RWQCBs were developed to oversee water quality on a day-to-day basis.

The RWQCBs have primary responsibility for protecting water quality in California. As discussed above, the RWQCBs regulate discharges to surface waters under the CWA. In addition, the RWQCBs are responsible for administering the Porter-Cologne Water Quality Control Act.

Pursuant to the Porter-Cologne Water Quality Control Act, the state is given authority to regulate waters of the state, which are defined as any surface water or groundwater, including saline waters. As such, any person proposing to discharge waste into a water body that could affect its water quality must first file a Report of Waste Discharge if a Section 404 permit is not required for the activity. “Waste” is partially defined as any waste substance associated with human habitation, including fill material discharged into water bodies.

REGIONAL AND LOCAL PLANS***San Bernardino County, Countywide Policy Plan***

The 2022 Countywide Policy Plan outlines countywide goals and policies as they relate to biological resources. Natural Resource (NR) goals and policies applicable to the project include:

Goal NR-5. Biological Resources: An interconnected landscape of open spaces and habitat areas that promotes biodiversity and healthy ecosystems, both for their intrinsic value and for the value placed on them by residents and visitors.

Policy NR-5.1: Coordinated habitat planning. We participate in landscape-scale habitat conservation planning and coordinate with existing or proposed habitat conservation and natural resource management plans for private and public lands to increase certainty for both the conservation of species, habitats, wildlife corridors, and other important biological resources and functions; and for land development and infrastructure permitting.

Policy NR-5.7: Development review, entitlement, and mitigation. We comply with state and federal regulations regarding protected species of animals and vegetation through the development review, entitlement, and environmental clearance processes.

Policy NR-5.8: Invasive species. We require the use of non-invasive plant species with new development and encourage the management of existing invasive plant species that degrade ecological function.

Per the policies outlined in the Countywide Policy Plan, the County reviews land development permits for adequacy in assessing potential impacts on NRs. The Planning Division of the County's Land Use Services has developed Biotic Resources Overlay Maps to identify sensitive biotic resources that may occur within specific areas of the County. All discretionary permit applications must disclose potential impacts on these identified resources and propose mitigation measures to eliminate or reduce significant impacts.

County of San Bernardino Burrowing Owl Overlay Zone

Land development permit applications within the Burrowing Owl Overlay Zone (County of San Bernardino 2012) must include an analysis of potential impacts on burrowing owl and provide proposed mitigation measures, if necessary, to reduce or eliminate such impacts. Though the site does not occur within the Burrowing Owl Overlay Zone, the analysis provided herein evaluates the potential for this species to occur on site.

County of San Bernardino Code Chapter 88.01: Plant Protection and Management

County Code §§ 88.01.010 through 88.01.090 outline provisions to preserve San Bernardino County's native trees and plants in certain areas of public and private property. Per §§ 88.01.050, a Tree or Plant Removal Permit is required for the removal of the following desert native plants:

- *Dalea spinosa* (with stems two inches or greater in diameter or six feet or greater in height)
 - All species of the genus *Prosopis* (with stems two inches or greater in diameter or six feet or greater in height)
 - All species of the family Agavaceae
 - Creosote rings (10 feet or greater in diameter)
 - All Joshua trees
 - *Olneya tesota* (any part, living or dead)
 - All species of the genus *Prosopis* (any part, living or dead)
 - All species of the genus *Cercidium* (any part, living or dead)
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- All species regulated under the California Desert Native Plants Act

2 METHODS

Rocks Biological Consulting (RBC) biologists conducted vegetation mapping, habitat assessments for special-status species, a western Joshua tree (*Yucca brevifolia*) census, and a general biological survey on June 17, 2025. Biologists Kelsey Woldt and Alec Goodman recorded the starting and ending survey conditions as follows: Time (1015 - 1410), Temperature (89F - 95F), Cloud Cover (0% - 0%), Wind Speed (3-5mph; 0-2mph). Additionally, RBC examined the site for the presence of potentially jurisdictional aquatic resources; however, a formal aquatic resources delineation to identify areas that may be considered jurisdictional under the Corps pursuant to Section 404 of the CWA, under the RWQCB pursuant to Section 401 of the CWA and the Porter-Cologne Water Quality Control Act, and under the CDFW pursuant to Section 1602 of the CFGC, was not conducted.

The general biological survey, vegetation mapping, constraints-level aquatic resources assessment, and habitat assessments were conducted within the approximately 4.3-acre project site boundary and a surrounding 100-foot buffer (survey area) for a total of 8.9 acres. The western Joshua tree census was conducted within the project site plus a 50-foot buffer. The 0.2 acre of off-site improvements adjacent to the project site and 29 Palms Highway are included in the buffer areas.

Note that buffer areas are included in this analysis to assess the potential for special-status species or resources in areas immediately adjacent to the project site that could be impacted by the project analyzed herein. Such information should not be considered comprehensive for all biological resources or aquatic resources that may occur in buffer areas, and buffer mapping is intended only for the project analysis outlined herein; such information is not intended for impact analysis of any potential future projects within or adjacent to project buffer areas.

2.1 DATABASE SEARCH

Prior to conducting field surveys, existing information regarding biological resources present or potentially present within the project site was obtained through a review of pertinent literature and databases, including, but not limited to:

- CDFW California Natural Diversity Database (CNDDDB; CDFW 2025a; Figure 3a)
- California Native Plant Society (CNPS) Electronic Inventory (CNPS 2025)
- USFWS Special-Status Species Database (USFWS 2025a; Figure 3b)
- USFWS Information for Planning and Consulting (IPaC) Database (USFWS 2025b)
- USFWS National Wetlands Inventory (NWI) Database (USFWS 2025c)
- USGS National Hydrography Dataset (NHD) Database (Figure 4)

Database results, along with local biological knowledge, were used for assessment of special-status species' potential for occurrence on or adjacent to the project site. The potential for occurrence tables created for the project include federally and state-listed species, candidate species, and other state-designated special-status species that have been reported within three miles of the project site (CDFW 2025a; USFWS 2025a) and determined to be potentially present in

the IPaC Database (USFWS 2025b), as well as California Rare Plant Rank (CRPR) 1 and 2 species that occur within the ‘Nine Quads’ search for the elevational range of the project site, approximately 3,210 to 3,222 feet above mean sea level (amsl; CNPS 2025). The CNPS ‘Nine Quads’ search queries the USGS quadrangle in which the project site is located and the surrounding eight quadrangles, which includes Bighorn Canyon, Landers, Rimrock, Joshua Tree North, Joshua Tree South, Morongo Valley, Yucca Valley North, and Yucca Valley South. The potential for special-status species to occur within the project site was refined by considering the habitat affinities of each species, field habitat assessments, vegetation mapping, and knowledge of local biological resources.

2.2 VEGETATION MAPPING AND GENERAL BIOLOGICAL SURVEYS

On June 17, 2025, RBC biologists conducted vegetation mapping in the field to provide a baseline of the biological resources that occur or have the potential to occur within the project site. RBC conducted vegetation mapping by walking throughout the survey area and mapping vegetation communities on aerial photographs at a 1:2400 scale (1 inch = 200 feet).

The extent of each habitat type (delineated as a habitat polygon on the vegetation maps) was calculated using the Geographic Information System (GIS) application ArcGIS Collector. Habitats were classified based on the dominant and characteristic plant species in accordance with vegetation community classifications outlined in Holland’s *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986). The vegetation communities were also compared to *The Manual of California Vegetation, 2nd Edition* (MCV2; Sawyer et al. 2009), and the equivalent classification is provided.

RBC biologists conducted general biological surveys for plants and wildlife concurrently with vegetation mapping. Photos taken during the general biological surveys are provided in Appendix A. Plant species encountered during the field survey were identified and recorded in field notebooks. Plant species that could not be identified were brought to the laboratory for identification using the dichotomous keys in the *Jepson Manual* (Baldwin et al. 2012). A list of the vascular plant species observed in the survey area is presented in Appendix B.

RBC conducted habitat assessments for special-status plants during the general biological field surveys. Special-status plant species include those that are: 1) listed or proposed for listing by federal or state agencies as threatened or endangered; 2) CRPR 1 or 2 species (CNPS 2025); or 3) considered rare, endangered, or threatened by the CDFW (CDFW 2025b) or other local conservation organizations or specialists.

In the state of California, CNPS is a statewide resource conservation organization that has developed an inventory of California’s sensitive plant species. The CRPR system is recognized by the CDFW and essentially serves as an early warning list of potential candidate species for threatened or endangered status. The CRPR system is categorized as outlined in Table 2.

Table 1. CRPR Definitions

CRPR	1A	Presumed extirpated in California and rare or extinct elsewhere
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	1B	Rare, threatened, or endangered in California and elsewhere
	2A	Presumed extirpated in California but more common elsewhere
	2B	Rare, threatened, or endangered in California but more common elsewhere
	3	Plants for which more information needed
	4	Plants of limited distribution
CRPR Threat Ranks	0.1	Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
	0.2	Moderately 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)

Wildlife species were documented during the field survey by sight, calls, tracks, scat, or other signs, and were recorded in field notebooks. Binoculars (10X42 magnification) were used to aid in the identification of wildlife. In addition to species observed during the surveys, expected wildlife use of the project site was assessed based on known habitat preferences of local species and knowledge of their biogeographic distribution in the region. RBC conducted habitat assessments for special-status wildlife during the general biological field surveys. Special-status wildlife species include those that are: 1) listed or proposed for listing by federal or state agencies as threatened or endangered; or 2) considered endangered, threatened, or rare by the CDFW (CDFW 2025b).

A list of wildlife species observed in the project site is presented in Appendix B; scientific and common names of wildlife follow CDFW’s Complete List of Amphibian, Reptile, Bird and Mammal Species in California (CDFW 2016). Twilight/nighttime surveys were not conducted, therefore crepuscular and nocturnal animals are likely under-represented in the project species list; however, habitat assessments were performed for all special-status species to ensure that any potentially present rare species are adequately addressed herein.

If observed, the location of biological resources designated as special-status by the USFWS, CDFW, and/or CNPS, were recorded in field notebooks, on aerial maps, and/or through the use of Global Positioning System (GPS) units.

2.3 SPECIAL-STATUS SPECIES SURVEYS

2.3.1 WESTERN JOSHUA TREE CENSUS

Western Joshua tree was observed on the project site during the general biological survey on June 17, 2025. As such, a focused western Joshua tree census was conducted on the project site and a 50-foot buffer during this initial site visit. Each western Joshua tree within the approximately 4.3-acre project site and surrounding 50-foot buffer received a unique identification number, and a sub-meter GPS was used to record the location of each tree.

In accordance with the *Western Joshua Tree Conservation Permitting Census Instructions* (CDFW 2024), trees were classified into the following size classes: A – less than one meter in height; B – one meter or greater but less than five meters in height; and C – five meters or greater in height. Additional information collected included status (live/dead), maturity (branched/not branched), phenological stage (flowers/fruits/none), and proposed impacts (removal, trim, relocation, other, or none). Complete survey methods for the focused western Joshua tree census will be provided in a separate survey report.

2.4 CONSTRAINTS–LEVEL AQUATIC RESOURCES ASSESSMENT

RBC conducted a constraints-level assessment of the survey area to identify areas that may be considered potentially jurisdictional under the Corps pursuant to Section 404 of the CWA, the RWQCB pursuant to Section 401 of the CWA and the Porter-Cologne Act, or CDFW pursuant to CFGC §1602. Areas with depressions, drainage patterns, wetland vegetation, and/or riparian vegetation within the review area were assessed for potential jurisdictional status, with focus on the presence of defined channels, soils, and hydrology. No formal jurisdictional delineation was conducted as part of this effort.

3 RESULTS

This section includes results of the literature review, vegetation mapping, general biological surveys, and constraints-level aquatic resources assessment; the results of the focused western Joshua tree census will be provided in a separate survey report. Special-status biological resources are also addressed in this section and are defined as follows: 1) species that have been given special recognition by federal, state, or local conservation agencies and organizations due to limited, declining, or threatened/endangered population sizes; 2) species and their associated habitat types recognized by local and regional resource agencies as sensitive; 3) habitat areas or vegetation communities that are unique, are of relatively limited distribution, or are of particular value to wildlife; 4) wildlife corridors and habitat linkages; and/or 5) biological resources that may or may not be considered sensitive, but are regulated under local, state, and/or federal laws.

3.1 PHYSICAL SETTING

The project site is a relatively flat parcel that supports developed land, disturbed land, Joshua tree woodland, and disturbed Joshua tree woodland. Disturbed habitat is found primarily along the southern and eastern borders of the project site, extending into the central site from the eastern project edge. Disturbance in the central portion of the project site appears to be recent with crushed vegetation and fresh scrape marks present. Joshua tree woodland covers the remainder of the project footprint and portions of the northern and southwestern site buffers. Disturbed Joshua tree woodland is present in the northwestern survey area in the project buffer, across Diadem Drive associated with residential development. Commercial and residential development surrounds the site on all sides with intermittent disconnected areas of native Joshua tree woodland.

On-site elevations range from approximately 3,210 to 3,222 feet amsl. Soils mapped on site include Ramona-Hanford-Greenfield and Wasco-Helendale-Bryman (Figure 4).

3.2 VEGETATION COMMUNITIES AND LAND COVERS

The project site supports low diversity in vegetation communities and other land covers. Table 2 provides a summary of vegetation/land cover on the site, which is depicted on Figure 2.

Table 2. Summary of Vegetation/Land Cover Within the Survey Area and Project Site

Vegetation (Holland) ¹	Vegetation (MCV2) ²	Global/State Rank	Survey Area (acres)	Project Site (acres)
Developed	Developed/Disturbed	No Rank	2.0	--
Disturbed habitat			2.0	1.4
Joshua tree woodland	<i>Yucca brevifolia</i> Woodland Alliance	G4/S3.2	4.6	2.8
Joshua tree woodland - Disturbed			0.3	0.0

Total³	8.9	4.3
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¹ Vegetation communities recognized by Holland (1986)

² Vegetation communities from Holland (1986) crosswalked to Sawyer et al. (2009)

³ Acreages summed using raw numbers provided during GIS analysis (available upon request) and thus the sum of the total rounded numbers may not directly add up in this table

Natural communities with ranks of S1 through S3 are considered sensitive natural communities by CDFW to be addressed in the environmental review processes of CEQA. Joshua tree woodland, both natural and disturbed subtypes, is ranked as S3.2; as such, it is considered a sensitive natural community jurisdictional under CEQA (CDFW 2025d).

Developed

Developed land is typically classified as lands regularly utilized by humans that are devoid of natural habitat. Developed land within the survey area primarily consists of residential development, paved roads, and sidewalks. Developed land does not occur within the project site but occurs in the surrounding buffer.

Developed habitat is not recognized by CDFW (CDFW 2025d); therefore, it is not considered a sensitive natural community under CEQA.

Disturbed habitat

Disturbed habitat is typically classified as land on which the native vegetation has been significantly altered by agriculture, construction, or other land-clearing activities, and the species composition and site conditions are not characteristic of the disturbed phase of a plant association (e.g., disturbed Joshua tree woodland). Disturbed habitat is typically found in vacant lots, along roadsides, within construction staging areas, and in abandoned fields. Non-native annual species and perennial broadleaf species typically dominate the habitat. Disturbed land occurs on 1.4 acres of the project site. Disturbed land on site is primarily bare ground with scattered coverage of annual burweed (*Ambrosia acanthicarpa*), tumbleweed (*Salsola* sp.), brome species (*Bromus* sp.), and evening primrose (*Oenothera* sp.) The area mapped as disturbed in the central portion of the project site shows signs of recent removal of vegetation as the vegetation cover is not consistent with the immediate surroundings and the topsoil looks disturbed.

Disturbed habitat is not recognized by CDFW (CDFW 2025d); therefore, it is not considered a sensitive natural community under CEQA.

Joshua Tree Woodland

Joshua tree woodland occurs on gentle alluvial fans, ridges, and gentle to moderate slopes and consists of scattered Joshua trees in the tree strata with a variety of desert shrubs, such as big sagebrush, blackbrush, ephedra species, California buckwheat, and Cooper's goldenbush (*Ericameria cooperi*).

Joshua tree woodland occurs on the majority of the project site (2.8 acres) and the project buffer (1.8 acres). It is dominated in the tree strata by Joshua tree while green ephedra (*Ephedra viridis*), desert senna (*Senna armata*), desert goldenhead (*Acamptopappus sphaerocephalus*), and

creosote bush (*Larrea tridentata*) primarily comprise the shrub layer. The herbaceous layer is largely old man schismus (*Schismus barbatus*) and brome species.

Joshua tree woodland is ranked as G4/S3.2, meaning it is “apparently secure worldwide,” “vulnerable statewide,” and “threatened” (CDFW 2025d); therefore, it is considered a sensitive natural community jurisdictional under CEQA.

Disturbed Joshua Tree Woodland

Disturbed Joshua tree woodland is similar to Joshua tree woodland; however, it has been substantially physically altered by human disturbance. Joshua tree woodland occurs on gentle alluvial fans, ridges, and gentle to moderate slopes and consists of scattered Joshua trees in the tree strata with a variety of desert shrubs, such as big sagebrush, blackbrush, ephedra species, California buckwheat, and Cooper’s goldenbush (*Ericameria cooperi*).

Disturbed Joshua tree woodland does not occur within the project boundary; however, it is present in the northwestern project buffer near residential development across from Diadem Drive (0.3 acre). Although Joshua trees are found in this portion of the survey area, disturbance is evident due to the lack of shrub and herbaceous layer vegetation.

Joshua tree woodland is ranked as G4/S3.2, meaning it is “apparently secure worldwide,” “vulnerable statewide,” and “threatened” (CDFW 2025d); therefore, it is considered a sensitive natural community jurisdictional under CEQA.

3.3 PLANTS AND WILDLIFE

The project site supports a relatively low diversity of wildlife and plant species. A total of 33 plant species (73 percent native, 27 percent non-native) were observed during the general biological survey and focused species surveys (Appendix B). A total of eight bird species, one reptile species, one mammal species, and one invertebrate species were observed (Appendix B).

3.3.1 SPECIAL-STATUS PLANT SPECIES

As the dominant species in Joshua tree woodland habitat, western Joshua trees, a candidate for listing under CESA, were observed throughout the project site and buffer. Two species regulated by the County Code Chapter 88.01 were also observed during the field survey and include calico cactus (*Echinocereus engelmannii*) and silver cholla (*Cylindropuntia echinocarpa*). No other special-status plant species were observed on site and none have a moderate or high potential for occurrence based on the relatively disturbed nature of the site and the development immediately surrounding the project site. Please note that CRPR 3 and 4 species were omitted from the potential to occur analysis below due to their relatively low threat status, consistent with standard practice. Additionally, special-status plant species with low potential to occur or not expected to occur are not addressed further in this report; because these species have low or no potential for occurrence, no impacts are anticipated on these species. A full list of special-status plant species assessed and their potential to occur on site is presented in Table 3.

Table 3. Assessment of Special-Status Plant Species Potential to Occur Within the Project Site

Species	Status	Habitat Description	Potential to Occur
Latimer's woodland-gilia (<i>Saltugilia latimeri</i>)	CNPR 1B.2	Annual herb. Blooms March-June. Chaparral, Mojavean desert scrub, pinyon and juniper woodland. Elevation 1,310-6,235 feet.	Low. Mojavean desert scrub habitat is present on site; however, dry desert slopes preferred by this species are absent. Species is known within four miles west and south of the project site (Calflora 2025).
Little San Bernardino Mtns. Linanthus (<i>Linanthus maculatus ssp. maculatus</i>)	CNPR 1B.2	Annual herb. Blooms March-May. Desert dunes, Joshua tree woodland, Mojavean and Sonoran desert scrub with sandy washes and flats. Elevation 460-4,005 feet.	Low. Joshua tree woodland present throughout the project site is suitable for this species. Species was recorded less than two miles from the project site in 1937 and 1940 (Calflora 2025). However, this species is likely extirpated from the area due to the development of habitat. The site is also disturbed.
Mojave beardtongue (<i>Penstemon clevelandii var. mohavensis</i>)	CRPR 1B.2	Perennial herb. Blooms March-May. Rocky hillsides and rock crevices in creosote-bush scrub, juniper-pinyon woodland, and chaparral. Elevation 3,035-5,315 feet.	Low. Preferred rocky hillside habitat is not present within the project site. Species was observed five miles east of the project site near the Desert View Conservation Area in 1935 (Calflora 2025).
Palmer's mariposa-lily (<i>Calochortus palmeri var. palmeri</i>)	CRPR 1B.2	Perennial bulbiferous herb. Blooms April-July. Chaparral, lower montane coniferous forest, meadows and seeps. Elevation 2,330-7,840 feet.	Low. Chaparral and montane forest habitat preferred by this species is not present within the project site. Species is not known within the project vicinity (Calflora 2025).
Parish's club-cholla (<i>Grusonia parishii</i>)	CRPR 2B.2	Perennial shrub (stem succulent). Blooms May-June. Sandy, gravelly flats in Mojavean and Sonoran desert scrub, and Joshua tree woodland. Elevation 985-5,000 feet.	None. This is a robust species and that would have been observed, if present on site.
Parish's daisy (<i>Erigeron parishii</i>)	CRPR 1B.1	Perennial herb. Blooms May-August. Mojavean desert scrub and pinyon and juniper woodland. Elevation 2,625-6,560 feet.	Low. Suitable Mojavean desert scrub habitat is present within the project site. However, this species prefers rocky slopes, active washes, and loose alluvial deposits which are absent from the site.

Species	Status	Habitat Description	Potential to Occur
Purple-nerve cymopterus (<i>Cymopterus multinervatus</i>)	CRPR 2B.2	Perennial herb. Blooms March-April. Mojavean desert scrub and Pinyon-juniper woodland. Elevation 2,590-5,905 feet.	Low. Suitable Mojavean desert scrub habitat is present within the project site; however, species is not known in project vicinity (Calflora 2025).
Robison's monardella (<i>Monardella robisonii</i>)	CRPR 1B.3	Perennial rhizomatous herb. Blooms from April-September. Pinyon-juniper woodland, desert scrub habitat. Elevation 2,000-4,920 feet.	Low. Granitic outcrops preferred by this species are absent from the project site.
San Bernardino milk-vetch (<i>Astragalus bernardinus</i>)	CRPR 1B.2	Perennial herb. Blooms April-June. Joshua tree woodland, pinyon-juniper woodland, rock outcrops, gravely soil, generally dolomite. Elevation 2,995-6,560 feet.	Low. Suitable Mojavean desert scrub habitat is present within the project site. Species was recorded less than 1.5 miles west of the project site in 1914 (Calflora 2025, CDFW 2025a). However, this species is likely extirpated from the area due to the development of habitat, surrounding land uses, and existing disturbances on site.
Shockley's rockcress (<i>Boechera shockleyi</i>)	CRPR 2B.2	Perennial herb. Blooms May-June. Pinyon-juniper woodland, rock outcrops, gravely soil, generally dolomite. Elevation 2,870-7,580 feet.	Low. Preferred pinyon-juniper woodland habitat with rock outcrops is not present within the project site. Species is not known in the project vicinity (Calflora 2025).
Southern jewelflower (<i>Streptanthus campestris</i>)	CRPR 1B.3	Perennial herb. Blooms May-July. Open, rocky conifer forest, yellow pine forest, chaparral, pinyon-juniper woodland. Elevation 2,955-7,545 feet.	Low. Preferred chaparral, forest, and pinyon-juniper woodland habitat is not present within the project site.
Tripple-ribbed milk-vetch (<i>Astragalus tricarinatus</i>)	CRPR 1B.2	Perennial herb. Blooms February-May. Joshua tree woodland, Sonoran scrub, creosote bush scrub, exposed rocky slopes, and canyon walls along desert washes. Elevation 1,475-3,905.	Low. Joshua tree woodland present throughout the project site is suitable for this species. However, this species is not likely to occur in this relatively developed portion of Yucca Valley. The project site also shows evidence of ongoing disturbance (graded areas, pedestrian trails, trash, etc.)
Western Joshua tree (<i>Yucca brevifolia</i>)	SCL	Tree. Blooms March-May. Joshua tree woodland and desert scrub. Elevation 1,315-7,545 feet.	Present. Species abundant throughout the project site.

Species	Status	Habitat Description	Potential to Occur
White-bracted spineflower (<i>Chorizanthe xanti</i> var. <i>leucotheca</i>)	CRPR 1B.2	Annual herb. Blooms April-June. Coastal scrub, Mojavean desert scrub, pinyon and juniper woodland. Elevation 985-3,935 feet.	Low. Although Mojavean desert scrub is present within the project site, this species prefers alluvial fans which are not present on site. Species is not known within the project vicinity (Calflora 2025).
SCL: State Candidate for listing under CESA CRPR: California Rare Plant Rank			

Western Joshua Tree

The western Joshua tree, a CESA candidate species, is endemic to the Mojave Desert in southern Nevada, southwestern Utah, western Arizona, southeastern California, and northern Baja California Norte (USDA n.d.). Numerous vegetation communities can support western Joshua tree including but not limited to, Joshua tree woodland, California juniper tree woodland, Mojave desert scrub, and Mojave mixed steppe habitats (USDA n.d.). Within California, the western Joshua tree is often associated with other plant species such as juniper (*Juniperus californica*), singleleaf pinyon (*Pinus monophylla*), shrub live oak (*Quercus turbinella*), blackbrush (*Coleogyne ramosissima*), green ephedra, eastern Mojave buckwheat (*Eriogonum fasciculatum*), white burrobrush (*Hymenoclea salsola*), bladdergrass (*Salazaria mexicana*), and Mojave desertrue (*Thamnosma montana*) (USDA n.d.). The yucca moth (*Tegeticula synthetica*) is responsible for pollination, and seeds are dispersed by mammals and wind. On average, western Joshua tree's temperature threshold ranges from -13 °F (-25 °C) to 120 °F (51 °C) and annual precipitation requirements range from 3.9 to 10.6 inches (98-268 mm; USDA n.d.)

Threats to western Joshua tree include climate change, fire, and habitat loss or degradation due to human activities (Center for Biological Diversity 2019). Seed dispersal is greatly inhibited by climate change-induced droughts which stall recruitment and kill adult trees. Development of private lands containing large stands of western Joshua tree poses a major threat to this species (Center for Biological Diversity 2019).

As previously mentioned, western Joshua tree, a candidate for listing under CESA, was recorded throughout the project site and 50-foot buffer. The trees occurring on site included trees of varying height classes: under one meter (including sprouts), between one and five meters, and over five meters. Additionally, several of the trees are considered reproductively mature and exhibited signs of fruiting and flowering. A detailed survey report will be provided separately that includes the results of the western Joshua tree census conducted on site.

No other special-status plant species, including federally or state-listed plant species, were observed during field surveys and none have a moderate or high potential to occur based on the lack of suitable habitats, proximity to frequent human disturbance in the immediate surrounding areas, and the isolated nature of the on-site native habitats from other large blocks of native vegetation (Table 3).

3.3.2 SPECIAL-STATUS WILDLIFE SPECIES AND CRITICAL HABITATS

No special-status wildlife species were observed during the general biological survey on June 17, 2025. Special-status wildlife assessed for their potential to occur on site are presented in Table 4, below. Please note that special-status wildlife species with low potential to occur or not expected to occur are not addressed further in this report (except for desert tortoise); because these species have low or no potential for occurrence, no impacts are anticipated on these species. A full list of special-status wildlife assessed and their potential to occur on site is presented in Table 4, below.

Table 4. Assessment of Special-Status Wildlife Species Potential to Occur Within the Project Site

Species	Status	Habitat Description	Potential to Occur
INVERTEBRATES			
Crotch's bumblebee (<i>Bombus crotchii</i>)	SCL; SSC	Found in open grasslands and scrublands from coastal California east toward the Sierra-Cascade Crest. Less common in western Nevada. Current populations of Crotch bumble bee are primarily found in Los Angeles, Orange, Riverside, and San Bernardino Counties. Occurs near food plants including <i>Antirrhinum</i> , <i>Phacelia</i> , <i>Clarkia</i> , <i>Dendromecon</i> , <i>Eschscholzia</i> , and <i>Eriogonum</i> .	Low. Appropriate forage plant species occur within the project site; however, no active nectar sources were observed on site.

Species	Status	Habitat Description	Potential to Occur
REPTILES			
Coast horned lizard (<i>Phrynosoma blainvillii</i>)	SSC	Found in a variety of habitats including sage scrub, chaparral, and coniferous and broadleaf woodlands. Observed on sandy or friable soils with open scrub. Requires open areas, bushes, and fine loose soil.	Low. Joshua tree woodland throughout the project site contains suitable sandy friable soils and open scrub habitat. Several observations from the 1890s of this species have occurred within one mile of the project site; however, these are likely extirpated due to habitat development (CDFW 2025a).
Desert tortoise (<i>Gopherus agassizii</i>)	FE; SE	Burrows in firm sandy or gravelly soils along creosote bush flats, riverbanks, washes, dunes, alluvial fans, hillsides, and canyons, often containing rocky areas.	Low. Sandy desert scrub habitat throughout the project site is suitable for this species. However, the site is surrounded by development and movement of desert tortoise into the site is unlikely.
Southern California legless lizard (<i>Anniella stebbinsi</i>)	SSC	Found in various habitats throughout its range (from Antioch, Contra Costa County south to the Mexican border) but especially common in coastal dune, valley-foothill, chaparral, coastal scrub types, sandy washes, and alluvial fans, containing moist, and loose soils.	Low. Suitable soils and habitat for this species is not present within the project site.
BIRDS			
Black-tailed gnatcatcher (<i>Polioptila melanura</i>)	WL	Found in desert scrub, including washes densely lined with creosote and salt bush as well as areas studded with ocotillo, prickly pear, cholla, and mesquite.	Low. Desert scrub and cholla are present on site, but shrub density is low.
Burrowing owl (<i>Athene cunicularia</i>)	SCL; SSC	Found in grasslands and open scrub from coast to foothills. Strongly associated with California ground squirrel and other fossorial mammal burrows.	Low-to-Moderate. Suitable open scrub habitat is present on site. Small mammal burrows including California ground squirrel burrow complexes occur on site. Species was detected by call approximately 2.5 miles north of the project site in 2016 (eBird 2025).

Species	Status	Habitat Description	Potential to Occur
Cooper's hawk (<i>Accipiter cooperii</i>)	WL	Usually found in oak woodlands but occasionally in willow or eucalyptus woodlands. Hunts on habitat edges often near riparian areas. Occasionally observed in urban areas.	Low. Open Joshua tree woodland habitat present on site but provides marginally suitable foraging habitat for this species. Additionally, riparian areas are absent. Species was observed in urban location less than one mile west of the project site in 2017 (eBird 2025).
Costa's hummingbird (<i>Calypte costae</i>)	BCC	Found in Sonoran and Mojave Desert scrub, coastal California chaparral and sage scrub, and deciduous forest and desert scrub.	Moderate. Mojave desert scrub present within the project site is suitable for this species. Species has been observed several times within 0.25 mile of the project site since 2023 (eBird 2025).
Golden eagle (<i>Aquila chrysaetos</i>)	FP; WL	Found in rolling foothills, mountain areas, sage-juniper flats, and desert habitats. Diet consists primarily of lagomorphs and rodents.	Low. Desert habitat on site provides marginally suitable foraging habitat for this species. Species observed in 2022 approximately 1.5 miles west of the project site (eBird 2025). However, it is unlikely to forage on site due to degree of existing disturbance. Suitable nesting absent does not occur in the surrounding area.
Lawrence's goldfinch (<i>Spinus lawrencei</i>)	BCC	Found in dry, open oak woodlands, coastal scrub, pinyon pine-juniper woodlands and streamside habitats.	Low. Suitable oak and pine-juniper woodlands not present on site; however, onsite Joshua tree woodland is marginally suitable.
Le Conte's thrasher (<i>Toxostoma lecontei</i>)	SSC, BCC	Found in saltbush scrub, creosote bush scrub, and other lightly vegetated desert scrub. Permanent resident within California range.	Moderate. Desert scrub habitat on site is suitable for this species. Species observed less than two miles west of the project site in 2017 and three miles east of the project site in 2010 (eBird 2025, CDFW 2025a)

Species	Status	Habitat Description	Potential to Occur
Loggerhead shrike (<i>Lanius ludovicianus</i>)	SSC	Found within grassland, chaparral, desert, and desert edge scrub, particularly near dense vegetation used for nesting.	Moderate. Joshua tree woodland habitat throughout the project site provides suitable foraging and nesting habitat for this species. Species was observed in 2024 and 2025 with 0.25 mile of the project site (eBird 2025).
Olive-sided flycatcher (<i>Contopus cooperi</i>)	SSC, BCC	Found along edges or within openings of semi-open to dense forests, largely composed of conifers in Southern California. Broaden tree genera preferences during migration; desert migrants are found in various habitats containing trees. Nest primarily in conifers, occasionally in willows, oaks, alders, and eucalyptus.	Low. Preferred conifer forest not present within the project site; however, desert migrants may occupy Joshua tree woodland. Species observed approximately 1.5 miles west of the project site in 2005 (eBird 2025).
Prairie falcon (<i>Falco mexicanus</i>)	WL	Open country throughout the West wherever they can find bluffs and cliffs to nest on, including in alpine habitat to about 11,000 feet. Breeding habitats include grasslands, shrub steppe desert, areas of mixed shrubs and grasslands, or alpine tundra, agriculture fields.	Low. Open desert scrub and Joshua tree woodland habitat on site provides marginally suitable foraging habitat for this species. Additionally, bluffs and cliffs required to nest are absent.
Sharp-shinned hawk (<i>Accipiter striatus</i>)	WL	Roost in mid- to high-canopy forests, nest in single layered forest canopy, prefer conifers, and hunt migratory birds and small animals (e.g., reptiles and insects) at the edge of woodlands, brushy pastures, and shorelines.	Low. Joshua tree woodland within the project site is marginally suitable for this species. Onsite Joshua trees may provide roosts. Species observed approximately 2 miles south of the project site in 2024 (eBird 2025). This species does not nest in southern California.
Swainson's hawk (<i>Buteo swainsoni</i>)	ST	Found in open habitats for foraging including grasslands, prairies, and sometimes pastures. Nest in solitary trees or sometimes very small groves near water.	Low. Suitable breeding and foraging habitat is not present.
Yellow-billed cuckoo (<i>Coccyzus americanus</i>)	FT; SE	Found primarily in riparian forests and woodlands.	Low. Suitable riparian habitat with dense cover is not present within the project site.

Species	Status	Habitat Description	Potential to Occur
Yellow breasted chat (<i>Icteria virens</i>)	SSC	Nests in early stage riparian habitats with adequate shrub cover and an open canopy where dense thickets and tall perching trees are present.	Low. Riparian habitat with dense shrub cover is not present within the project site.
Yellow warbler (<i>Dendroica petechia brewsteri</i>)	SSC	Found in riparian habitats along aquatic resources containing willows and cottonwoods or in wet meadows. Riparian species generalist depending on geographic location. Occasionally found in disturbed or semiurban areas.	Low. Riparian habitat preferred by this species is not present within the project site; however, semiurban areas surrounding the site are potentially suitable.
MAMMALS			
Pallid San Diego pocket mouse (<i>Chaetodipus fallax</i>)	SSC	Found in coastal and desert scrub, chaparral, chamise-redshank, pinyon-juniper, and annual grassland. Burrows in rocky, gravelly or sandy soil. Preference for feeding on grass seed.	Low. Desert scrub habitat and friable soils present within the project site. Species observed approximately three miles west of the project site in 1903 and 1969 (CDFW 2025). There are no recent observations of this species in the project vicinity; development surrounding the project site makes occupation by this species unlikely.
Western yellow bat (<i>Lasiurus xanthinu</i>)	SSC	Found in Los Angeles and San Bernardino counties south to the Mexican border. Found below 2,000 ft amsl in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees including those of Aracaceae (palm family).	Low. Suitable desert riparian and desert wash habitats not present within the project site. Roosting trees preferred by this species are absent.
FE: Federally Endangered FT: Federally Threatened SC: State Candidate for listing under CESA SE: State Endangered ST: State Threatened FP: CDFW Fully Protected Species SSC: CDFW Species of Special Concern WL: CDFW Watch List Species BCC: Birds of Conservation Concern			

3.3.2.1 Threatened and Endangered Wildlife Species

Burrowing Owl (Athene cunicularia)

On October 10, 2024, the California Fish and Game Commission unanimously approved the listing of burrowing owl as a candidate species for listing under CESA. The species will undergo a one-year review prior to issuance of a final decision on listing. As a candidate for potential listing, the species is temporarily awarded the same protections as a state-listed endangered or threatened species (CFGF 2024).

Suitable burrowing owl habitat can be found in annual and perennial grasslands, deserts, and scrublands characterized by low-growing vegetation (Zarn 1974). Suitable burrowing owl habitat may also include trees and shrubs if the canopy covers less than 30 percent of the ground surface. Burrows are the essential component of burrowing owl habitat; both natural and artificial burrows provide protection, shelter, and nests for burrowing owl (Henny and Blus 1981). Burrowing owls typically use burrows made by fossorial mammals, such as ground squirrels or badgers, but may also use human-made structures, such as concrete culverts, debris piles, or openings beneath concrete or asphalt pavement.

Burrowing owls have declined throughout much of their range because of habitat loss due to urbanization, agricultural conversion, and destruction of ground squirrel colonies (Remsen 1978). The incidental poisoning of burrowing owls and the destruction of their burrows during eradication programs aimed at rodent colonies have also caused their decline (Collins 1979; Remsen 1978). Although burrowing owls are relatively tolerant of lower levels of human activity, human-related impacts, such as shooting and introduction of non-native predators, have negative population impacts. Burrowing owls often nest and perch near roads where they are vulnerable to roadside shooting, fatal car strikes, and general harassment (Remsen 1978).

No burrowing owl individuals, active sign, or evidence of burrowing owls were observed during the general biological survey on June 17, 2025. However, records of this species existing within three miles of the project site. Due to the presence of suitable habitat and small-mammal burrows throughout the project site, burrowing owl could forage, seek refuge, and/or breed on site in the future; this species has a low-to-moderate potential to occur.

Desert Tortoise (Gopherus agassizii)

Desert tortoise is federally and state-listed as endangered. This species ranges across the Mojave, Sonoran, and Colorado deserts and occupies desert scrub, desert washes, and Joshua tree woodland habitats at elevations between below sea level to 7,220 feet (Zeiner et al., 1990). Desert tortoise is most active between March and June and may remain active year-round dependent on food availability and environmental conditions. This species excavates burrows in friable soils, often under shrubs and on slopes, to provide shelter and serve as a nest. Desert tortoise primarily feed on annual forbs and grasses.

This species is preyed upon by common raven (*Corvus corax*), raptors, and mammals, and is most vulnerable when young. Human presence and development can cause an increase in predator populations by providing supplementary food sources (e.g., human food waste); desert tortoises

are threatened by increased predation near human development. Desert tortoise is also threatened by the destruction of, or disturbance to, desert scrub habitat and by poaching (Zeiner et al., 1990).

Although the project site occurs within the range of desert tortoise and there are historical records of this species within three miles of the project site, desert tortoise individuals, recent sign, or suitable burrows were not observed during the general biological survey. The project site is situated along a highway and is immediately surrounding by urban development (paved roads, retail stores, etc.) and isolated from larger blocks of natural desert tortoise habitat. The chances of desert tortoise currently inhabiting the site or moving onto the site in the future are low due to the existing conditions surrounding the site. Desert tortoise has a low potential to occur.

3.3.2.2 Other Special-Status Wildlife Species

Costa's Hummingbird (Calypte costae)

Costa's hummingbird is a USFWS BCC. It is found year-round in southern California, southwestern Arizona, the Baja peninsula, and northwestern Mexico. Its breeding range extends further into the southwestern United States and northwestern Mexico, and its wintering range extends south to the western coast of central Mexico. In California, Costa's hummingbird inhabits Sonoran and Mojave desert scrub, chaparral, and sage scrub. In the Mojave they are typically found in scrub and woodland habitats near springs and streams with cottonwoods, brittlebush, and four-wing saltbush among other trees and shrubs (Baltosser and Scott, 1996). This species feeds on nectar and small flying insects. They nest about 3-7 feet above ground in shrubs, often with little vegetative cover (Baltosser and Scott, 1996). The greatest threats to Costa's hummingbird are conversion of desert scrub to developed land and livestock grazing.

Although this species was not observed during the general biological survey, this species is commonly occurring in the region. Suitable habitat for this species occurs on site; although surrounding development and anthropogenic disturbances may deter this species from nesting on site, there is moderate potential for this species to forage.

LeConte's Thrasher (Toxostoma lecontei)

LeConte's thrasher is designated a CDFW SSC and a USFWS BCC, and is primarily found in open desert wash, desert scrub, alkali desert scrub, and desert succulent shrub habitats with well-drained soils characteristic of alluvial fans. Though predominately insectivorous, LeConte's thrasher occasionally consumes seeds and small vertebrates. LeConte's thrasher hunts on the ground by prodding leaf litter or soils to flush prey. Nesting occurs in desert washes within dense cactus or spiny shrub cover approximately three feet above ground with sufficient shade (Sheppard 1996).

Habitat loss and degradation threaten LeConte's thrasher populations. Suitable habitat is often manipulated by off-road vehicle use or is converted to agriculture, grazed pasture, or developed land (Shuford et al., 2008a). Wildfires which periodically destroy salt bush scrub habitats and soil seed stores further threaten LeConte's thrasher populations.

Although this species was not observed during the general biological survey, this species is commonly occurring in the region. Suitable habitat for this species occurs on site; although

surrounding development and anthropogenic disturbances may deter this species from nesting on site, there is moderate potential for this species to forage.

Loggerhead Shrike (Lanius ludovicianus)

Loggerhead shrike is a CDFW SSC and is a non-migratory year-round resident in southern California. Loggerhead shrikes prefer open habitat, typically with short vegetation and scattered shrubs. This species consumes a diet mainly consisting of insects but also feeds on reptiles, birds, and small mammals. Loggerhead shrikes use a feeding technique where the bird impales prey on spines or thorns of shrubs. Thus, loggerhead shrike suitable habitat requires vegetation with spines or thorns (Yosef 1996), or artificial objects such as barbed wire.

Leading causes of decline for this species include urban development and ingestion of pesticide-laden prey. Loggerhead shrike numbers are still fairly large across North America; however, the species has dramatically declined over the past century (Yosef 1996).

Although this species was not observed during the general biological survey, this species is commonly occurring in the region. Suitable habitat for this species occurs on site; although surrounding development and anthropogenic disturbances may deter this species from nesting on site, there is moderate potential for this species to forage.

3.3.2.3 Critical Habitat

The ESA defines critical habitat as a specific geographic area, or areas, that contains features essential for the survival and recovery of endangered and threatened species. USFWS designates critical habitat for endangered and threatened species and may include sites for breeding and rearing, movement or migration, feeding, roosting, cover, and shelter. Critical habitat may also include areas that are not currently occupied by the species, but that will be needed for its recovery.

No USFWS designated critical habitat overlaps with the project site.

3.4 WILDLIFE CORRIDORS

The project site occurs in a developed setting, adjacent to 29 Palms Highway and surrounded by urban development. The project is also isolated from large blocks of native habitat and is not considered to be a part of any wildlife corridors supporting regional or local movement between other blocks of native habitat. No wildlife corridors are mapped on site (CDFW 2025c).

3.5 POTENTIAL FEDERAL AND STATE JURISDICTIONAL AQUATIC RESOURCES

No aquatic resources were identified within the project site and 50-foot buffer during desktop review of the NWI, NHD databases, and historic aerial photos. During the constraints-level aquatic resources assessment on June 17, 2025, one aquatic resource potentially jurisdictional per the Corps, RWQCB, and/or CDFW was observed within the project site. RBC mapped one ephemeral roadside ditch along Diadem Drive which may be considered jurisdictional by CDFW and the RWQCB. The unvegetated feature originates offsite from the north, flows on site, and borders

Diadem Drive for approximately 300 feet before dissipating into sheet flow. The feature displayed a visible bed and bank and appeared to exhibit a change in vegetation species and cover when moving from the active floodplain to the surrounding uplands. No standing water was observed within the earthen roadside drainage. The roadside drainage is not anticipated to be jurisdictional per the Corps as it did not exhibit a continuous surface connection to a traditionally navigable water (TNW) as defined by 33 Code of Federal Regulations (CFR) 328.3 (88 FR 61964, September 8, 2023; Revised Definition of “Waters of the United States”; Conforming) and would be defined as a Non-Relatively Permanent Water.

One roadside swale and two erosional features were recorded on the project site which are not anticipated to be jurisdictional per the U.S. or State. The swale and erosional features exhibit the same upland vegetation within their “bed” as the surrounding uplands. The roadside swale appears to collect water from Avalon Avenue, does not show evidence of flow, and lacks a defined bed and bank. Erosional features on the project site appear to be associated with the maintenance of on-site transmission structures, exhibit an incised break in slope, and lack all other indicators of an OHWM. The soil complex (Ramona-Hanford-Greenfield) documented within the survey area, is not considered hydric per the NRCS nor are there vegetation communities occurring within the review area that contain riparian and/or hydrophytic species.

The roadside drainage observed within the survey area would likely be considered a non-wetland water of the State under the RWQCB as well as jurisdictional streambed under CDFW. A formal, site-specific aquatic resources delineation and reporting per Corps, RWQCB, and CDFW standards would be required to confirm the anticipated jurisdictional status and extent of the aquatic resources on site. Note that the anticipated jurisdictional status of the on-site aquatic resources per the Corps may change pending further guidance from the Corps related to the amended definition of waters of the U.S. provided in 33 Code of Federal Regulations (CFR) 328.3. The U.S. Environmental Protection Agency (EPA) published the Amendments to the “Revised Definition of ‘Waters of the United States’” within the Federal Register on September 8, 2023.

4 IMPACT ANALYSIS

Direct impacts are caused by the project and occur at the same time and place as the project. Any alteration, disturbance, or destruction of biological resources that would result from project-related activities is considered a direct impact. Direct impacts would include direct losses to native habitats, potential jurisdictional waters, wetlands, and special-status species; and diverting natural surface water flows. Direct impacts could include injury, death, and/or harassment of listed and/or special-status species. Direct impacts could also include the destruction of habitats necessary for species breeding, feeding, or sheltering. Direct impacts on plants can include crushing of adult plants, bulbs, or seeds.

Indirect impacts can result from project-related activities where biological resources are affected in a manner that is not direct. Indirect impacts may occur later in time or at a place that is farther removed in distance from the project than direct impacts, but indirect impacts are still reasonably foreseeable and attributable to project-related activities. Examples include habitat fragmentation; elevated noise, dust, and lighting levels; changes in hydrology, runoff, and sedimentation; decreased water quality; soil compaction; increased human activity; and the introduction of invasive wildlife (domestic cats and dogs) and plants (weeds). As noted in Section 2, the survey area included a 100-foot buffer to identify nearby biological resources and to aid in the assessment of potential indirect impacts on protected resources, if present.

Cumulative impacts refer to incremental individual environmental effects of two or more projects when considered together. Such impacts taken individually may be minor but are collectively significant in light of regional impacts.

The significance thresholds as outlined in Appendix G of the state CEQA Guidelines (CCR Title 14, Division 6, Chapter 3, Sections 15000–15387) have been used to determine whether project implementation would result in a significant direct, indirect, and/or cumulative impact. A significant biological resources impact would occur if the project would:

- 1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;
- 2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS;
- 3) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- 5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy, or ordinance;

- 6) Conflict with the provisions of an adopted HCP; NCCP or other approved local, regional, or state HCP.

CEQA Threshold 1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?

4.1 SPECIAL-STATUS PLANTS AND WILDLIFE IMPACTS

Western Joshua Tree Impacts

The proposed project would result in the direct removal of western Joshua trees from within the impact footprint due to grading required to construct the project. Western Joshua trees occurring outside of the impact footprint also have the potential to be impacted; root systems of western Joshua trees encroaching the project site may be damaged during project grading. To offset impacts on western Joshua tree, an incidental take permit shall be obtained, which would require compensatory mitigation strategies for any trees directly removed as a result of project construction (MM-2).

Burrowing Owl Impacts

Project implementation may impact burrowing owl, a candidate for listing under CESA. Although this species was not observed during the general biological survey, it has a low-to-moderate potential to occur.

With project implementation, direct impacts on burrowing owl could occur in the form of death, injury, or harassment of nesting birds, their eggs, and their young, if present. Injury or mortality occurs most frequently during the vegetation clearing stage of construction and affects eggs, nestlings, and recently fledged young that cannot safely avoid equipment. Harassment, injury, or mortality of the species resulting from the project is considered potentially significant.

To avoid direct impacts on burrowing owls, pre-construction clearance surveys, CDFW consultation, and best management practices as outlined in MM-1 and MM-3 would be implemented. With implementation of the mitigation measures, direct impacts on burrowing owls, if present, would be reduced to less than significant.

Indirect impacts on burrowing owl could occur if burrowing owl is present adjacent to the project site and construction occurs at night using lighting. Such impacts are potentially significant because lights could reduce burrowing owls' hunting success and make burrowing owls easier targets for predators. However, indirect impacts resulting from the project would not increase substantially from the existing conditions surrounding the site, including vehicular traffic on 29 Palms Highway and the surrounding urban development. As such, indirect impacts during project construction are anticipated to be less than significant.

Desert Tortoise Impacts

Desert tortoise has a low potential to occur on site due to the extent of anthropogenic disturbance on site, the immediate surroundings of urban development including 29 Palms Highway, and the

project site's isolation from large blocks of native habitat that could support the species. As such, impacts on desert tortoise are not anticipated.

Other Special-Status Wildlife Species Impacts

Costa's hummingbird, LeConte's thrasher, and loggerhead shrike have moderate potential to occur on the project site; therefore, direct impacts through loss of suitable foraging habitat could occur with project implementation. However, suitable foraging habitat for these species are abundant throughout the region. The project would result in the removal of approximately two acres of habitat during construction, which is isolated from larger blocks of natural habitat. As such, removal of suitable foraging habitat would be less than significant.

Project construction activities could result in direct impacts on nesting Costa's hummingbird, LeConte's thrasher, and loggerhead shrike, if nests are present. Vegetation trimming or removal of suitable habitat within an active breeding territory could result in harassment, injury, damage or destruction of an active nest, and/or death of adults, eggs, and/or young during construction activities. Impacts to active nest would be potentially significant. However, to avoid or minimize such impacts on nesting Costa's hummingbird, LeConte's thrasher, and loggerhead shrike, best management practices and pre-construction surveys are required as outlined in MM-1 and MM-4.

Nesting Bird Impacts

The proposed project has the potential to impact active bird nests if vegetation is removed or ground disturbing activities are initiated during the nesting season. Joshua tree woodland (natural and disturbed subtypes) within the project site have the potential to support avian nests and impacts on nesting birds are prohibited by the MBTA and/or CFGC §3503. To avoid potential direct impacts on nesting birds, removal of suitable nesting habitat would occur outside of the breeding season (MM-4), when feasible. In addition, within three days prior to site disturbance or construction activities, a biologist would conduct a nesting bird survey. If active nests are found, construction activity would be avoided in a buffer area around the nest until nestlings have fledged and the nest is determined to be inactive, and a biologist would be retained to monitor nesting activity. With the adherence of such mitigation measures, described further in Section 5, impacts on nesting birds resulting from the project would be less than significant.

Critical Habitat Impacts

USFWS designated critical habitat does not occur on site. Therefore, impacts on critical habitat are not anticipated.

CEQA Threshold 2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS?

4.2 NATIVE VEGETATION IMPACTS

The proposed project would result in impacts developed land, disturbed habitat, and Joshua tree woodland (Figure 5; Table 5). Developed land and disturbed habitat are not considered native

vegetation communities and impacts on those land covers would not be considered significant. However, impacts on Joshua tree woodland (natural and disturbed subtypes)/*Yucca brevifolia* Woodland Alliance, will occur with project implementation. *Yucca brevifolia* Woodland Alliance has a state sensitive ranking of S3.2 and is therefore considered a sensitive natural community. Impacts on sensitive natural communities are potentially significant. However, as the state candidate for listing western Joshua tree is the dominant species in *Yucca brevifolia* Woodland Alliance, compensatory mitigation for impacts on the species may also be used to satisfy mitigation requirements for impacts on this sensitive natural community. Therefore, with implementation of MM-2, impacts on sensitive natural communities would be less than significant.

Table 5. Vegetation Communities/Land Cover Project Impacts

Vegetation (Holland) ¹	Vegetation (MCV2) ²	Global/ State Rank	On-site Impacts (acres)	Off-Site Impacts (acres)
Developed	Developed/Disturbed	No Rank	>0.1	>0.1
Disturbed habitat			1.2	0.1
Joshua tree woodland	<i>Yucca brevifolia</i> Woodland Alliance	G4/S3.2	0.8	>0.1
Joshua tree woodland - Disturbed			--	--
Subtotal³			2.0	0.2
Total³			2.2 acres	

¹ Vegetation communities recognized by Holland (1986)

² Vegetation communities from Holland (1986) crosswalked to Sawyer et al. (2009)

³ Acreages summed using raw numbers provided during GIS analysis (available upon request) and thus the sum of the total rounded numbers may not directly add up in this table

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

4.3 POTENTIALLY JURISDICTIONAL AQUATIC RESOURCES IMPACTS

The limits of on-site jurisdictional aquatic resources would be determined through the completion of a site-specific jurisdictional delineation and preparation of an Aquatic Resources Delineation Report (ARDR) in accordance with Corps, RWQCB, and CDFW standards. Permitting through the Corps, RWQCB, and CDFW would be required for impacts on non-wetland waters of the U.S. jurisdictional by the Corps, non-wetland waters of the State jurisdictional by the RWQCB, and streambed jurisdictional by the CDFW. As aforementioned, the on-site roadside drainage is not anticipated to be jurisdictional per the Corps considering its classification as a Non-Relatively Permanent Water; however, this feature is potentially jurisdictional per RWQCB and CDFW pending completion of a jurisdictional delineation. The project applicant will be responsible for acquiring the

necessary authorizations required by the regulatory agencies and associated compensatory mitigation requirements, if applicable.

CEQA Threshold 4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

4.4 WILDLIFE CORRIDOR IMPACTS

The project site does not function as part of a regional or local wildlife corridor. The project site is within an urban setting, immediately surrounding by development and existing obstructions to wildlife movement, and is not connected to large blocks of natural habitat. Impacts on wildlife corridors and native wildlife nursery sites are not anticipated.

CEQA Threshold 5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy, or ordinance?

4.5 LOCAL POLICIES AND ORDINANCES IMPACTS

County of San Bernardino Code Chapter 88.01: Plant Protection and Management

Two cacti species regulated under County Code 88.01 were observed on site and will require a Tree/Plant Removal Permit from the County Land Use Services Department, which may require salvage and transplantation with the implementation of a salvage plan (MM-5). Except for western Joshua tree, no other plants regulated under the County Code Chapter 88.01 were observed on site. Although a focused special-status plant survey was not conducted (except for the western Joshua tree census), the species regulated under Chapter 88.01 are conspicuous species that would have been observed if present. Although western Joshua tree is regulated under Chapter 88.01, compensatory mitigation requirements as detailed in MM-2 would offset impacts from the removal of western Joshua trees on site; therefore, no additional impacts on County-regulated plants are anticipated.

CEQA Threshold 6: Conflict with the provisions of an adopted HCP; NCCP; or other approved local, regional, or state HCP?

4.6 HABITAT CONSERVATION PLAN; NATURAL COMMUNITY CONSERVATION PLAN; OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN IMPACTS

The project site is not located within an active HCP or NCCP area; therefore, the project would not result in impacts on HCPs or NCCPs.

4.7 CUMULATIVE IMPACTS

Cumulative impacts are defined as the direct and indirect effects of a proposed project which, when considered alone, would not be deemed a substantial impact, but when considered in

addition to the impacts of related projects in the area, would be considered potentially significant. 'Related projects' refers to past, present, and reasonably foreseeable probable future projects, which would have similar impacts to the proposed project. The project site is disturbed, surrounded by development, and does not support sensitive natural vegetation communities. As such, the proposed project will not result in significant cumulative effects.

However, through the environmental review process, all projects in the region would be individually required to reduce their own impacts through compensatory mitigation, as well as other project-specific mitigation measures and avoidance and minimization measures. Compensatory mitigation would be subject to agency approval and would be planning with consideration to other open space preserved in perpetuity to create large, undisturbed habitat blocks. Because the impacts associated with the project would be fully mitigated, the cumulative contribution to region-wide impacts would be less than significant.

5 MITIGATION MEASURES

The following discussion provides project-specific mitigation measures; adherence with these measures is necessary to avoid and minimize impacts on biological resources resulting from the project.

5.1 BEST MANAGEMENT PRACTICES

MM-1: The following best management practices shall be implemented during construction:

- Construction vehicles shall not exceed 15 miles per hour on unpaved roads adjacent to the project site or the right-of-way accessing the site.
- The Applicant, or its contractors, will screen, cover, or elevate at least one (1) foot above ground, all construction pipe, culverts, or similar structures with a diameter of three (3) inches or greater that are stored on site overnight. These pipes, culverts, and similar structures will be inspected by the project biologist for wildlife before such material is moved, buried, or capped.
- Construction activities shall occur during daytime hours.
- A biologist shall flush special-status species (i.e., avian or other mobile species) from suitable habitat areas within the project development footprint to the maximum extent practicable immediately (e.g., within 24 hours) prior to initial vegetation removal activities. The biologist shall flush wildlife by walking through habitat to be imminently removed.
- At the end of each workday during construction, the Applicant, or its contractors, will cover all excavated, steep-sided holes or trenches more than eight inches deep and that have sidewalls steeper than 1:1 (45 degree) slope with plywood or similar materials, or provide a minimum of one escape ramp per 100 feet of trenching (with slopes no greater than 3:1) constructed of earth fill or wooden planks. The Applicant, or its contractors will thoroughly inspect holes and trenches for trapped animals each workday.
- Contractors shall not permit pets on the construction site.
- If trash and debris need to be stored overnight during maintenance activities, fully covered trash receptacles that are animal-proof and weather-proof shall be used by the maintenance contractor to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Alternatively, standard trash receptacles may be used during the day, but must be removed or emptied each night.
- To prevent inadvertent disturbance to areas outside the limits of work, the construction limits shall be clearly demarcated (e.g., installation of flagging or temporary visibility construction fence) prior to ground-disturbance activities, and all construction activities, including equipment staging and maintenance,

shall be conducted within the marked disturbance limits. The work limit delineation shall be maintained throughout project construction.

- The applicant, or its contractors, shall avoid the use of invasive plant species in the associated landscaping.

5.2 WESTERN JOSHUA TREE INCIDENTAL TAKE PERMIT

MM-2: Prior to start of ground-disturbing and vegetation removal activities, a qualified biologist shall conduct a census of all western Joshua trees in the BIG footprint plus a 50-foot buffer. The location of each western Joshua tree shall be recorded using a sub-meter Geographical Positioning System (GPS). The following information shall be recorded for each tree: Unique identifier, photograph, size class (Class A: <1m, Class B: 1-4.9m, Class C: 5m or greater), maturity (yes or no), phenology (flowering, fruiting, or none), condition (live or dead), and impact (removal, work activities within 15m). Prior to start of ground-disturbing activities, the information collected during the census shall be summarized in a census table and submitted to CDFW and the City of Barstow

If western Joshua trees would be impacted by construction activities (i.e., require relocation or payment of a mitigation fee), and prior to start of ground-disturbing activities, the applicant shall apply for and acquire an ITP under the Western Joshua Tree Conservation Act, CESA, or other acceptable permitting pathway from CDFW. The applicant shall adhere to all requirements of the project-specific ITP.

5.3 BURROWING OWL AVOIDANCE AND MITIGATION MEASURES

MM-3: No less than 14 days prior to the onset of construction activities, a qualified biologist shall survey the construction limits of the project site and a 500-foot buffer for the presence of burrowing owls and occupied nest burrows. A second survey shall be conducted within 24 hours prior to the onset of construction activities. The surveys shall be conducted in accordance with the most current CDFW survey methods. If burrowing owls are not observed during the clearance survey, no additional conditions are required to avoid impacts to burrowing owl.

The project applicant shall submit at least one burrowing owl pre-construction survey report to the satisfaction of the City to document compliance with this mitigation measure. For the purposes of this measure, 'qualified biologist' is a biologist who meets the requirements set forth in the BUOW Guidelines (CDFW 2012).

If burrowing owl is documented on site or within 500-feet of the site during either pre-construction surveys or biological monitoring, occupied burrowing owl burrows shall not be disturbed. CDFW shall be contacted within 48 hours of the burrowing owl observation and disturbance avoidance buffers shall be set up by a qualified biologist in accordance with the recommendations from CDFW.

No work shall occur within avoidance buffers until consultation with CDFW and issuance of incidental take permits, if required.

If avoidance of burrowing owls is not possible, either directly or indirectly, consultation with CDFW shall be pursued to determine the appropriate course of action. CDFW may require an ITP or a Burrowing Owl Relocation and Mitigation Plan. The conditions of the permit or measures outlined in the plan shall be adhered to by the project proponent and any required compensatory mitigation of habitat would be provided.

5.4 NESTING BIRD AVOIDANCE

MM-4: To ensure compliance with CFGC sections 3503, 3503.5, and 3513 and to avoid potential impacts to nesting birds, vegetation clearing and ground-disturbing activities shall be conducted outside of the bird nesting season (generally February 15 through August 31), if feasible. Regardless of the time of year, a qualified biologist will conduct a nesting bird survey within three (3) days prior to any disturbance of the site, including but not limited to vegetation clearing, disking, demolition activities, staging, or grading.

If active nests are identified, the biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and species observed. Buffer areas shall be avoided until the nests are no longer occupied, and the juvenile birds can survive independently from the nests. During construction activities, the qualified biologist shall continue biological monitoring activities at a frequency recommended by the qualified biologist using their best professional judgment. If nesting birds are documented, avoidance and minimization measures may be adjusted and construction activities stopped or redirected by the qualified biologist to avoid take of nesting birds.

If nesting birds are not documented during the pre-construction survey, adherence to additional measures may not be necessary to avoid impacts to nesting birds.

5.5 COUNTY OF SAN BERNARDINO CODE CHAPTER 88.01

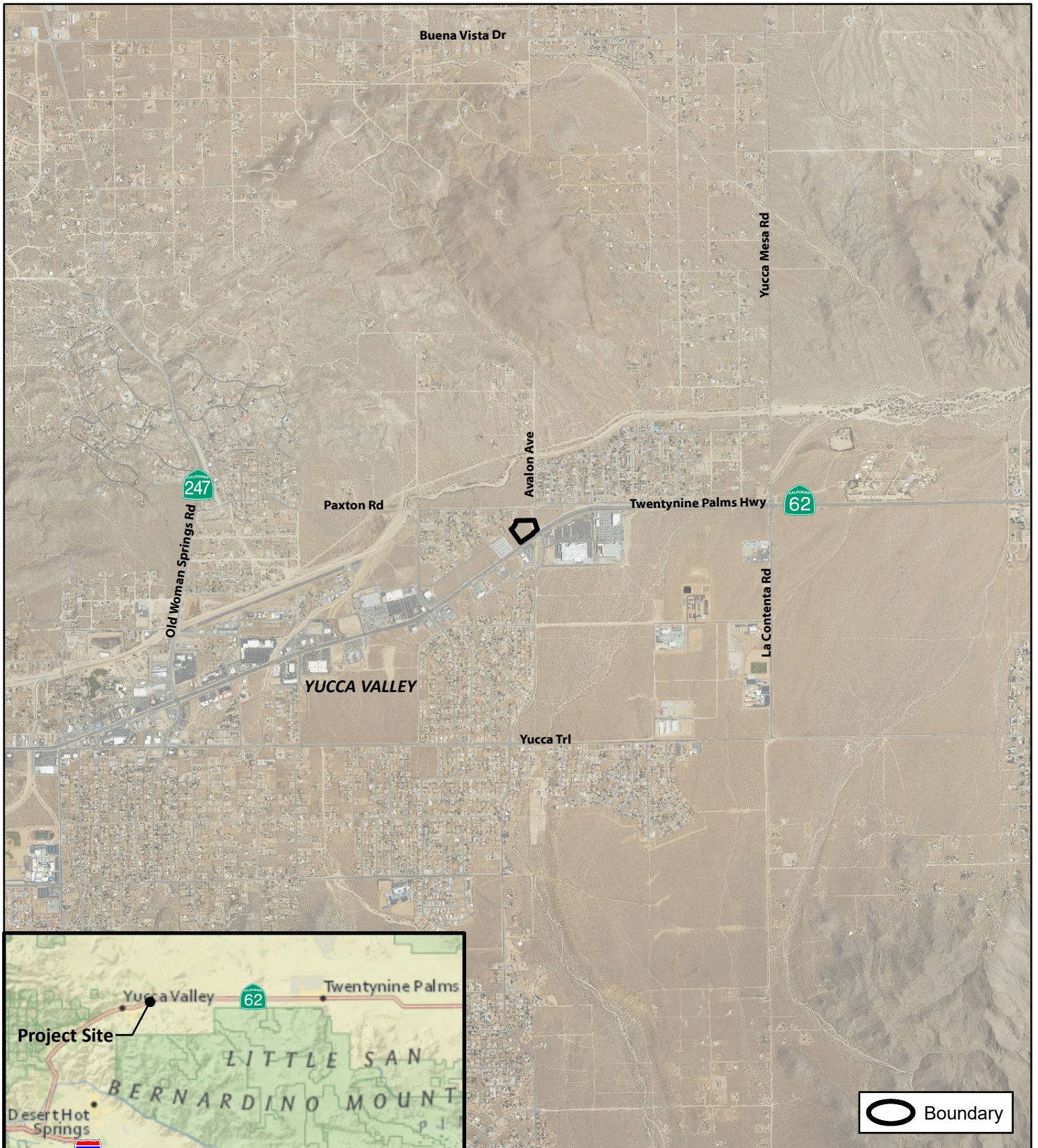
MM-5: Prior to start of ground-disturbing activities, the applicant shall apply for and acquire a Plant Removal Permit from the County Department of Land Use Services, pursuant to County Code § 88.01 for the removal of any plant species regulated under County Code § 88.01.060. Adequate mitigation for CDNPA/County-protected plants may include the payment of permit fees as required by the County and/or salvage of plants for translocation to a suitable recipient site if removal cannot be avoided. In the case of translocation, a Desert Native Plant Salvage Plan shall be prepared for review and approval by the County. The plan shall include a description and map showing plants to be salvaged, salvage and transport methods, the proposed recipient site, and disposition of the plant specimens at the recipient site. Recipient sites may include existing conservation areas, botanical preserves, museums and zoological societies,

among other conservation organizations that provide adequate habitat and management of desert native plants.

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 Boundary

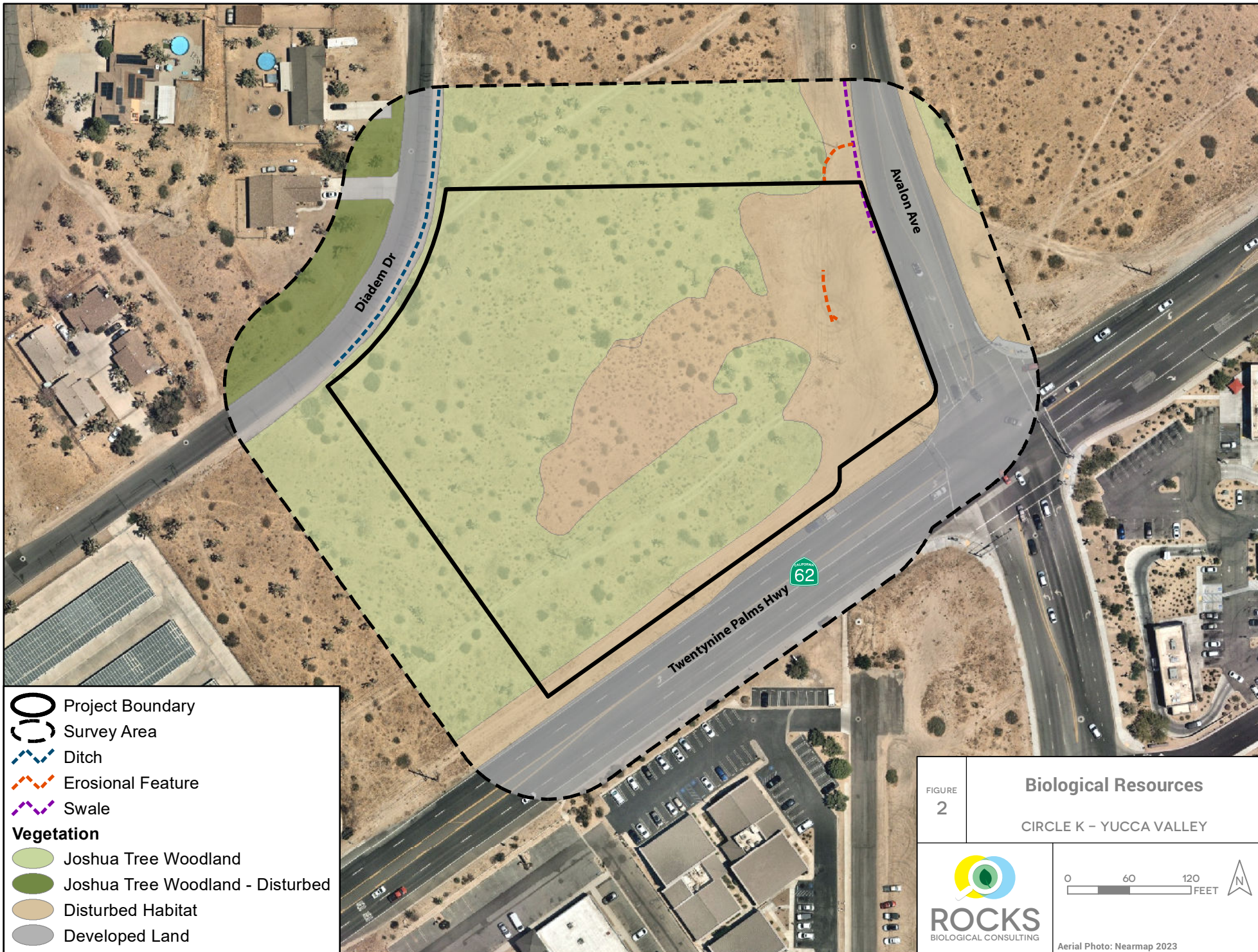
FIGURE
1






Project Location

CIRCLE K - YUCCA VALLEY



Aerial Photo: USDA NAIP 2024
Regional Map: National Geographic



-  Project Boundary
-  Survey Area
-  Ditch
-  Erosional Feature
-  Swale

Vegetation








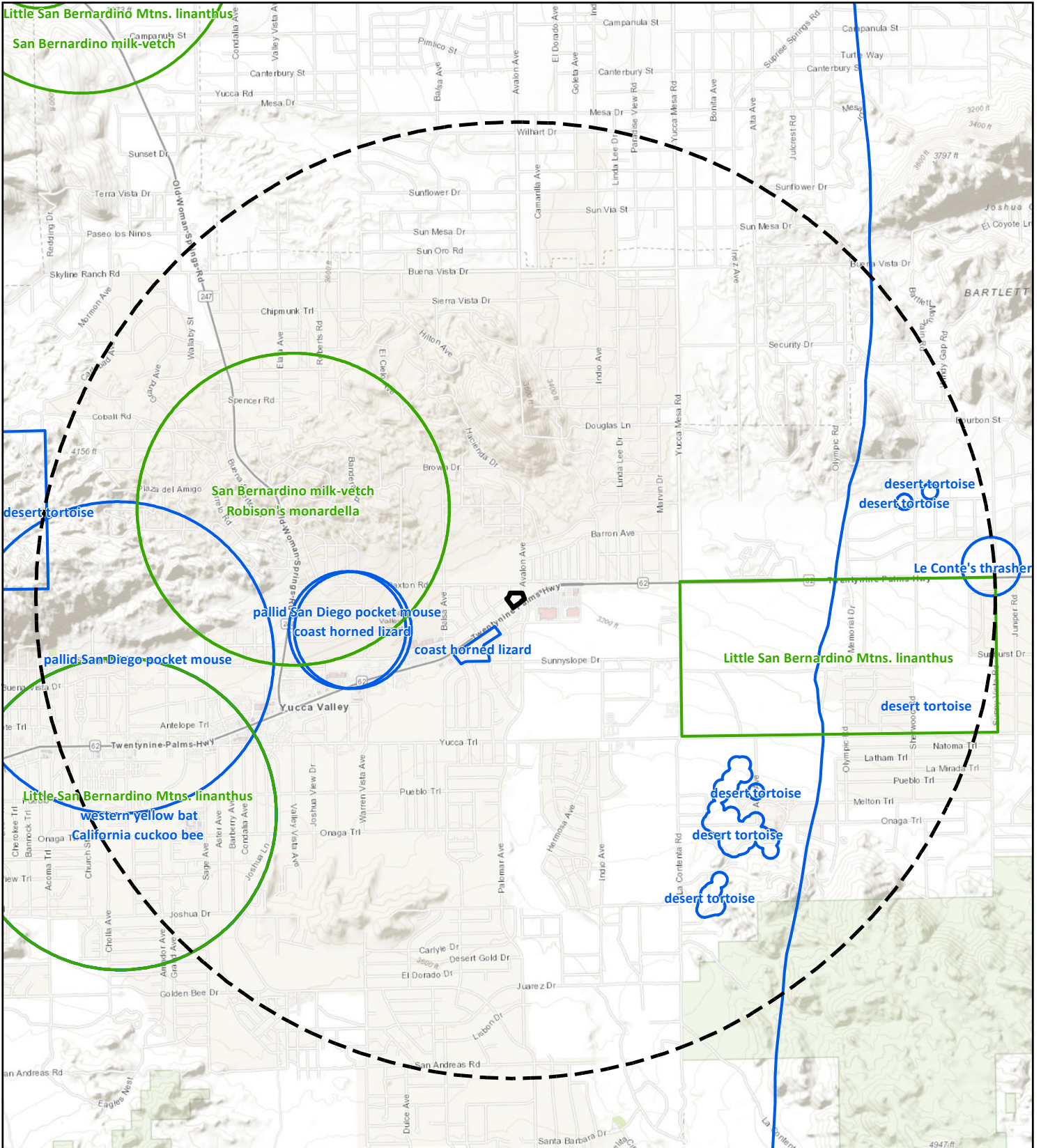
-  Joshua Tree Woodland
-  Joshua Tree Woodland - Disturbed
-  Disturbed Habitat
-  Developed Land

FIGURE 2	<h2 style="margin: 0;">Biological Resources</h2> <p style="margin: 0;">CIRCLE K - YUCCA VALLEY</p>
	  <small>Aerial Photo: Nearmap 2023</small>



Legend

- Project Boundary
- 3-mile Buffer
- CNDDB Plant Species Locations
- CNDDB Wildlife Species Locations

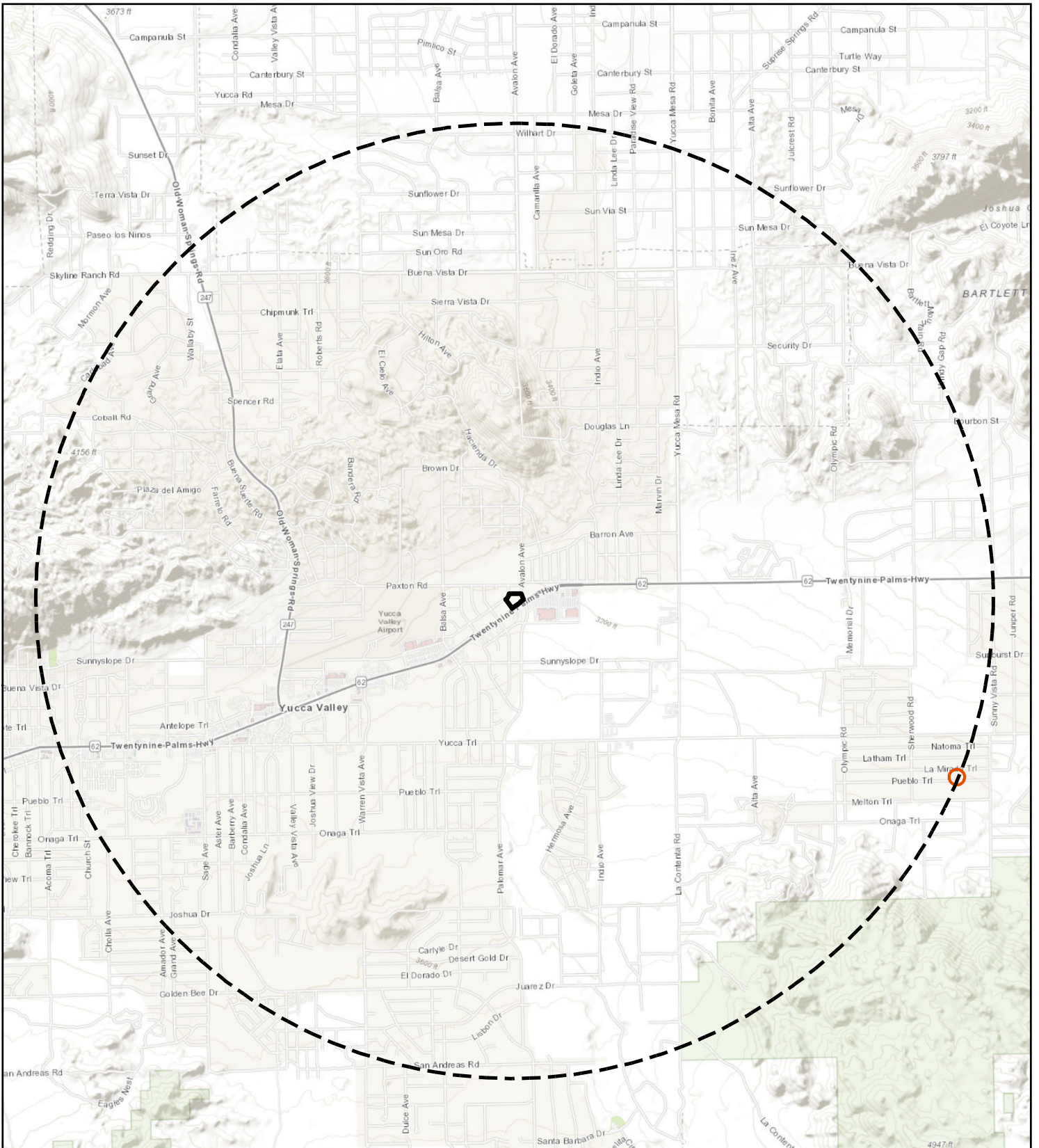
FIGURE 3A

CNDDB Plants and Wildlife

CIRCLE K - YUCCA VALLEY

0 2,250 4,500 FEET

Base Map: Esri Topographic Map
Source: CDFW









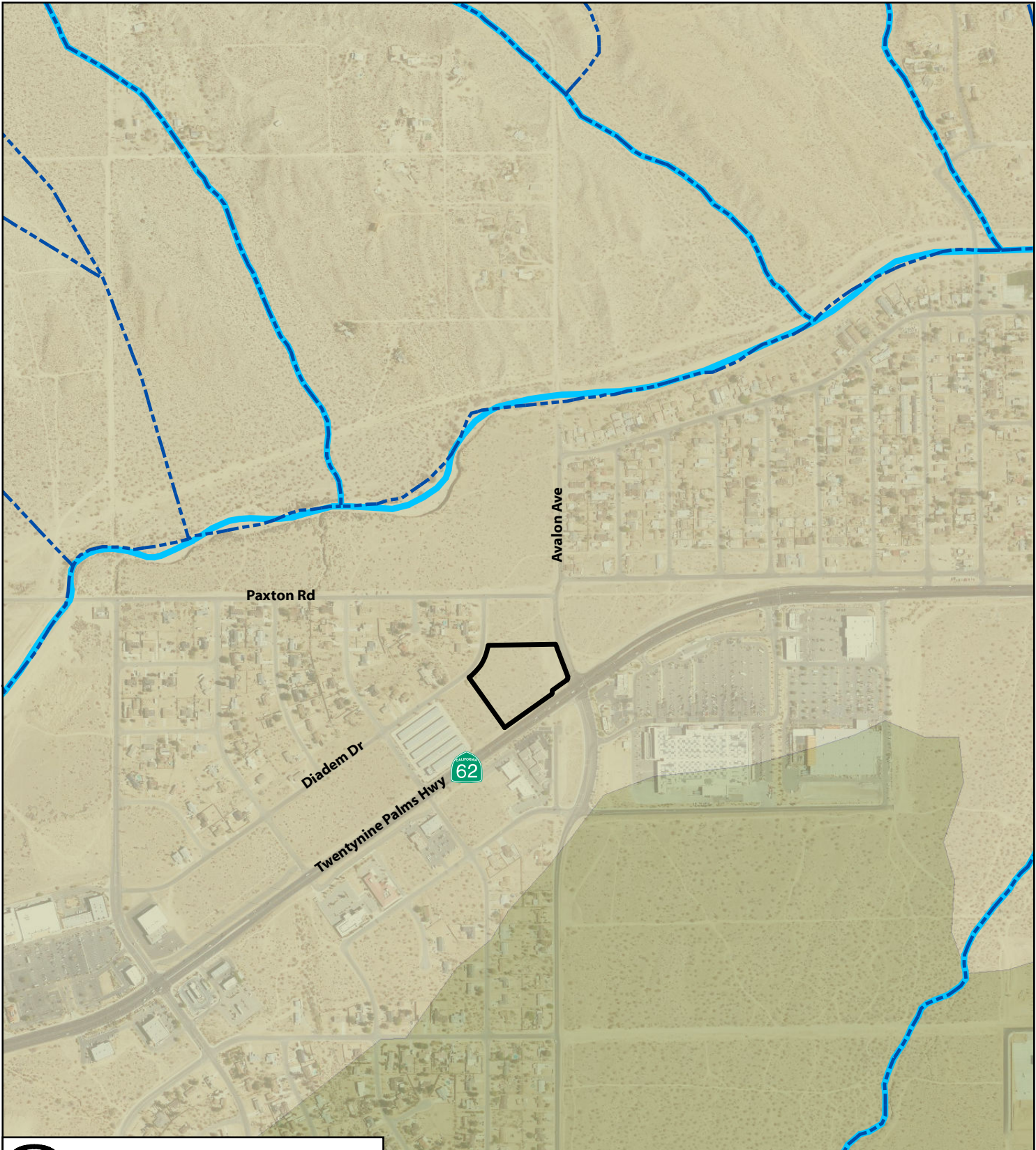
 Project Boundary
 3-mile Buffer
 USFWS Species Locations
 Yellow-billed Cuckoo

FIGURE
3B
USFWS Plants and Wildlife
 CIRCLE K - YUCCA VALLEY


 Base Map: Esri Topographic Map
 Source: USFWS

0 2,250 4,500 FEET










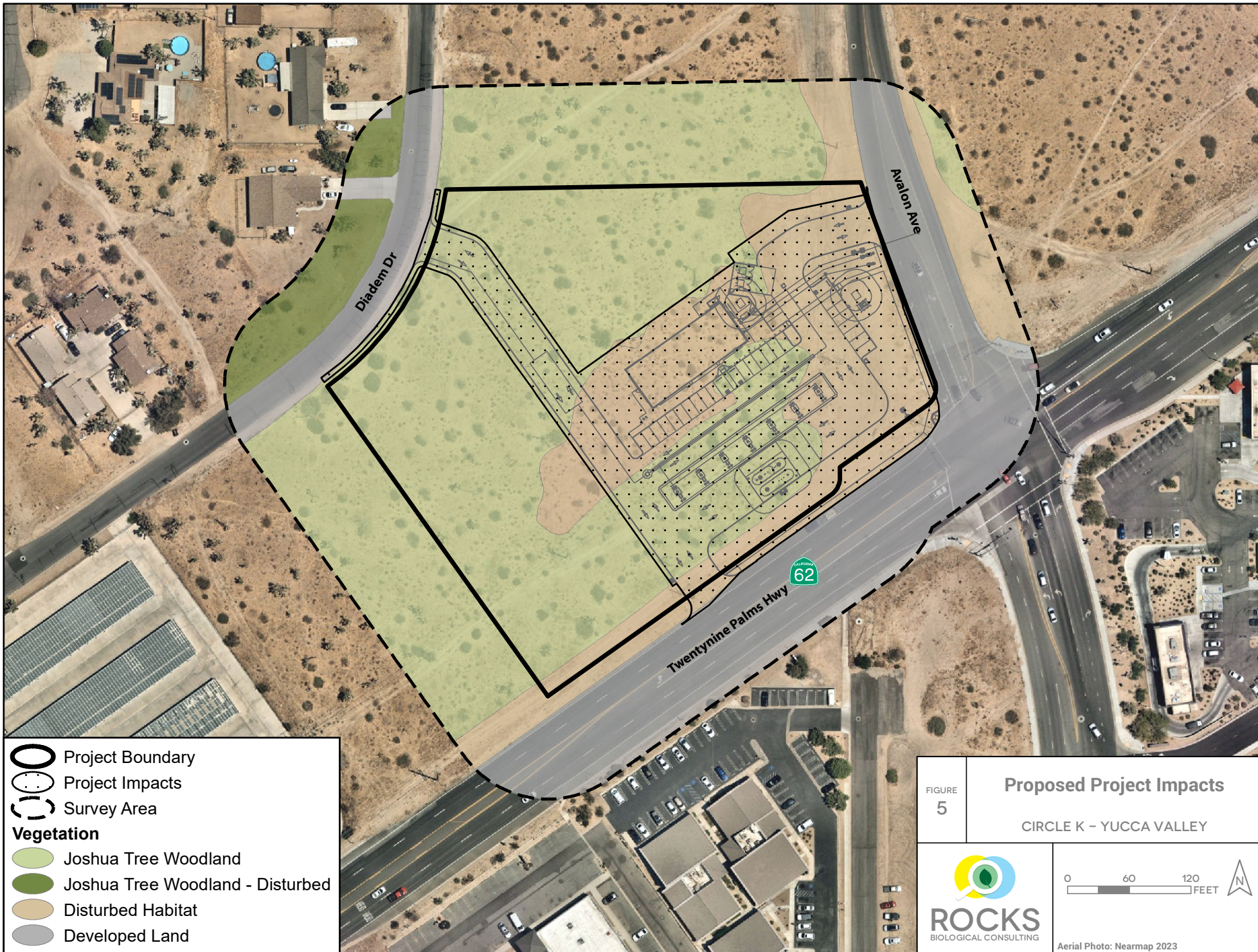



 Project Boundary
National Hydrography Dataset (NHD)
 Stream/River
National Wetlands Inventory (NWI)
 Riverine
Soils
 Ramona-Hanford-Greenfield (s1009)
 Wasco-Helendale-Bryman (s1032)

FIGURE 4
Soils, National Hydrology Dataset, and National Wetland Inventory
 CIRCLE K - YUCCA VALLEY


 Source: USFWS; USGS
 Aerial Photo: USDA NAIP 2022





-  Project Boundary
-  Project Impacts
-  Survey Area

Vegetation







-  Joshua Tree Woodland
-  Joshua Tree Woodland - Disturbed
-  Disturbed Habitat
-  Developed Land


FIGURE
5
Proposed Project Impacts
CIRCLE K - YUCCA VALLEY



ROCKS
BIOLOGICAL CONSULTING



0 60 120 FEET



Aerial Photo: Nearmap 2023

Appendix A
Site Photographs



Photo 1. Overview of disturbed habitat in the eastern portion of the project site near Avalon Avenue, facing northeast. June 17, 2025.



Photo 2. View of disturbed habitat in the eastern portion of the project site, facing the intersection of Avalon Avenue and 29 Palms Highway, facing southeast. June 17, 2025.



Photo 3. View of Joshua tree woodland habitat (background) and disturbed habitat (foreground) with recently removed native *Ephedra* sp. shrub, facing northwest. June 17, 2025.



Photo 4. View of Joshua tree woodland habitat in the northwestern project site (right), bounded by Diadem Drive (left), facing northeast. June 17, 2025.



Photo 5. View of 29 Palms Highway (background) and disturbed habitat along the eastern project edge, facing southwest. June 17, 2025.



Photo 6. View of disturbed Joshua tree woodland within the central project site, facing southeast. June 17, 2025.



Photo 7. View of recently disturbed area with fresh blade marks in the central project site, facing northeast. June 17, 2025.



Photo 8. View of disturbance path within Joshua tree woodland extending through the central project site, facing northeast. June 17, 2025.

Appendix B
Plant and Wildlife Species Observed

Family	Scientific Name	Common Name
Plants		
Amaranthaceae	<i>Salsola</i> sp.	<i>Salsola</i> species*
Agavaceae	<i>Yucca brevifolia</i>	Western Joshua tree (CSE)
Asteraceae	<i>Acamptopappus sphaerocephalus</i>	Desert goldenhead
Asteraceae	<i>Ambrosia acanthicarpa</i>	Annual bursage
Asteraceae	<i>Ambrosia psilostachya</i>	Ragweed
Asteraceae	<i>Stephanomeria exigua</i>	Small wirelettuce
Bignoniaceae	<i>Chilopsis linearis</i>	Desert willow
Boraginaceae	<i>Amsinckia</i> sp.	<i>Amsinckia</i> species
Boraginaceae	<i>Cryptantha micrantha</i>	Redroot cryptantha
Boraginaceae	<i>Cryptantha</i> sp.	<i>Cryptantha</i> species
Brassicaceae	<i>Brassica tournefortii</i>	Sahara mustard*
Cactaceae	<i>Echinocereus engelmannii</i>	Calico cactus
Cylindropuntia	<i>Cylindropuntia echinocarpa</i>	Silver cholla
Ephedraceae	<i>Ephedra</i> sp.	<i>Ephedra</i> species
Ephedraceae	<i>Ephedra viridis</i>	Green ephedra
Euphorbiaceae	<i>Croton californicus</i>	California croton
Fabaceae	<i>Astragalus</i> sp.	<i>Astragalus</i> species
Fabaceae	<i>Parkinsonia aculeata</i>	Mexican palo verde*
Fabaceae	<i>Senna armata</i>	Desert senna
Geraniaceae	<i>Erodium cicutarium</i>	Red stemmed filaree*
Hydrophyllaceae	<i>Phacelia</i> sp.	<i>Phacelia</i> species
Onagraceae	<i>Oenothera californica</i>	California evening primrose
Poaceae	<i>Bromus diandrus</i>	Ripgut brome*
Poaceae	<i>Bromus madritensis</i>	Foxtail chess*
Poaceae	<i>Bromus rubens</i>	Red brome*
Poaceae	<i>Bromus tectorum</i>	Downy chess*
Poaceae	<i>Hilaria rigida</i>	Big galleta
Poaceae	<i>Schismus barbatus</i>	Mediterranean grass*
Polemoniaceae	<i>Eriastrum eremicum</i>	Desert woollystar

Family	Scientific Name	Common Name
Polygonaceae	<i>Chorizanthe brevicornu</i>	Brittle spineflower
Polygonaceae	<i>Eriogonum reniforme</i>	Kidney-leaf buckwheat
Solanaceae	<i>Datura wrightii</i>	Jimsonweed
Zygophyllaceae	<i>Larrea tridentata</i>	Creosote bush
Invertebrates		
Formicidae	<i>Pogonomyrmex</i> sp.	Red harvester ant
Reptiles		
Phrynosomatidae	<i>Callisaurus draconoides</i>	Zebra-tailed lizard
Birds		
Accipitridae	<i>Buteo jamaicensis</i>	Red-tailed hawk
Columbidae	<i>Columba livia</i>	Rock pigeon*
Columbidae	<i>Streptopelia decaocto</i>	Eurasian collared dove*
Columbidae	<i>Zenaida macroura</i>	Mourning dove
Corvidae	<i>Corvus corax</i>	Common raven
Fringillidae	<i>Heamorrhous mexicanus</i>	House finch
Passeridae	<i>Passer domesticus</i>	House sparrow*
Tyrannidae	<i>Tyrannus vociferans</i>	Cassin's kingbird
Mammals		
Sciuridae	<i>Otospermophilus beecheyi</i>	California ground squirrel
* Non-Native/Introduced Species CSE: Candidate State Endangered under California Endangered Species Act		