APPENDIX C1

BIOLOGICAL RESOURCES EVALUATION

BIOLOGICAL RESOURCES ASSESSMENT

SUN MESA (BILLINGS) MINI STORAGE PROJECT

YUCCA VALLEY, SAN BERNARDINO COUNTY, CALIFORNIA

(APN 0597-111-67-0000)

LSA

October 2025

BIOLOGICAL RESOURCES ASSESSMENT

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YUCCA VALLEY, SAN BERNARDINO COUNTY, CALIFORNIA

(APN 0597-111-67-0000)

Submitted to:

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LSA Project No. 20252490

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LIST OF ABBREVIATIONS AND ACRONYMS

amsl	above mean sea level
APN	Assessor's Parcel Number
BMPs	Best Management Practices
BRA	Biological Resources Assessment
BUOW	Burrowing owl (*Athene cunicularia*)
CDFW	California Department of Fish and Wildlife
CDNPA	California Desert Native Plant Act
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	CDFW's California Natural Diversity Database
CNPS	California Native Plant Society
County	San Bernardino County
CRPR	California Rare Plant Rank
CWA	Clean Water Act
DETO	Desert tortoise (*Gopherus agassizii*)
FESA	Federal Endangered Species Act
ft	foot/feet
IPaC	USFWS' Information for Planning and Consultation
ITP	Incidental Take Permit
LSA	LSA Associates, Inc.
MBTA	Migratory Bird Treaty Act
MM	Mitigation Measure

NRCS	Natural Resources Conservation Service
project	Sun Mesa (Billings) Mini Storage Project
RWQCB	Regional Water Quality Control Board
SR-247	State Route 247
SSC	Species of Special Concern
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
WJTCA	Western Joshua Tree Conservation Act

EXECUTIVE SUMMARY

LSA Associates, Inc. (LSA) was retained by DRP Enterprises, LLC to conduct a general biological study of the approximately 4.34-acre Sun Mesa (Billings) Mini Storage Project (project) site located within Assessor's Parcel Number (APN) 0597-111-67-0000, located in the Town of Yucca Valley, San Bernardino County (County), California. The study was conducted to address compliance with the California Environmental Quality Act (CEQA), the California Endangered Species Act (CESA), and the Federal Endangered Species Act (FESA). Results of the general biological study are summarized below.

The project site contains potentially suitable habitat for burrowing owl (*Athene cunicularia hypugaea*), desert tortoise (*Gopherus agassizii*), and Crotch's bumble bee (*Bombus crotchii*). Pre-construction surveys for these species will be required to ensure any direct impacts to these species will be avoided.

The project site does provide suitable habitat for nesting birds protected under the California Fish and Game Code and the Migratory Bird Treaty Act (MBTA). It is recommended that vegetation removal be conducted between September 1 and January 15 (outside the general bird nesting season) to avoid impacts to nesting birds. If vegetation cannot be removed outside the bird nesting season, a pre-construction nesting bird survey by a qualified biologist is required 72 hours prior to vegetation removal.

There were no drainage features identified within the project site that are considered potential jurisdiction waters that may be subject to the regulatory authority of the United States Army Corps of Engineers (USACE), the California Department of Fish and Wildlife (CDFW), or the Regional Water Quality Control Board (RWQCB).

The project will apply for an incidental take permit (ITP) for western Joshua tree (*Yucca brevifolia)* under the Western Joshua Tree Conservation Act (WJTCA), a tree removal permit for Mojave yucca (*Yucca schidigera*) and California juniper (*Juniperus californica*) under Development Code Section 9.09.050 for the Town of Yucca Valley, and a permit for removal of other protected desert native plants under the California Desert Native Plant Act (CDNPA). The project will not conflict with any local policies or ordinances and is not within an adopted habitat conservation plan area. The project site does not contain wildlife corridors, nursery sites, or natural communities of concern. Additionally, standard Best Management Practices (BMPs) shall be implemented during construction activities to reduce impacts to wildlife resources in the project vicinity.

INTRODUCTION

DRP Enterprises, LLC, retained LSA to conduct a Biological Resources Assessment (BRA) for the Sun Mesa (Billings) Mini Storage Project (project) on Assessor's Parcel Numbers (APN) 0597-111-67-0000 in San Bernardino County, California (Figure 1; all figures are provided in Appendix A). The project proposes an approximately 89,700-square-foot (4.34-acre) mini storage facility and associated parking facilities.

The survey identified vegetation communities, the potential for the occurrence of special-status species, or habitats that could support special-status wildlife species, and recorded all plants and animals observed or detected within the project boundary. This BRA is designed to address the potential effects of the proposed project on designated critical habitats and/or special-status species. Information contained in this document is in accordance with accepted scientific and technical standards that are consistent with the requirements of the United States Fish and Wildlife Service (USFWS) and the CDFW. Additionally, the site was surveyed for any drainage features that would meet the definition of the waters of the United States, waters of the State, or CDFW jurisdiction.

SITE DESCRIPTION

The 4.34-acre project site is a currently undeveloped parcel within the Town of Yucca Valley, in San Bernardino County, California, as depicted on the United States Geological Survey (USGS) *Yucca Valley North, California* 7.5-minute series topographic quadrangle map in Section 13 of Township 1 North, Range 5 East, San Bernardino Baseline and Meridian (USGS 1989).

Specifically, the site is approximately 680 feet (ft) east of California State Route 247 (SR-247), located on the southeast corner of Newton Lane and Sun Mesa Drive; Figure 1 (all figures are provided in Appendix A) details the project location.

METHODS

LITERATURE REVIEW

A literature review and record search were conducted to identify the existence and potential for occurrence of sensitive or special-status plant and animal species in the project vicinity. Species occurrence records were reviewed for the following quadrangles containing and surrounding the project site: *Yucca Valley North*, *Bighorn Canyon, Landers, Goat Mountain, Rimrock, Yucca Valley South, Joshua Tree North*, and *Joshua Tree South, California,* USGS 7.5-minute quadrangles. These quadrangles were selected based on proximity and topographic and elevational similarity to the project site.

Federal and State lists of sensitive species were examined. Current electronic database records reviewed include the following.

- **California Natural Diversity Database information (CNDDB – RareFind 5)** (CDFW 2024a, 2025), which is administered by the CDFW, formerly known as the California Department of Fish and Game. This database covers sensitive plant and animal species, as well as sensitive natural communities that occur in California.

- **California Native Plant Society's (CNPS) Electronic Inventory of Rare and Endangered Vascular Plants** (CNPS 2024, 2025), which uses four specific categories or "lists" of sensitive plant species to assist with the conservation of rare or endangered botanical resources. All of the plants constituting California Rare Plant Ranks 1A, 1B, 2A, and 2B are intended to meet the status definitions of "threatened" or "endangered" in CESA and the California Fish and Game Code and are considered by CNPS to be eligible for State listing. At the discretion of the CEQA Lead Agency, impacts to these species may be analyzed as such, pursuant to *State CEQA Guidelines* Sections 15125(c) and 15380. Plants in Rank 3 (limited information; review list), Rank 4 (limited distribution; watch list), or other species that are considered Locally Unusual and Significant may be analyzed under CEQA if there is sufficient information to assess potential significant impacts.

- **United States Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) Online System** (USFWS 2024a, 2025), which lists all proposed, candidate, threatened, and endangered species managed by the Endangered Species Program of the USFWS that have the potential to occur on or near a particular site. This database also lists all known critical habitats. An IPaC Resource Report was generated for the project area.

In addition to the databases listed above, historic and current aerial imagery, existing environmental reports for developments in the project vicinity, and regional habitat conservation plans and local land use policies related to biological resources were reviewed. Wetland resources including riparian corridors were determined using the USFWS Wetlands Mapper online edition (USFWS 2024b).

SOILS

Before conducting the surveys, soil maps of the project vicinity were referenced online to determine the types of soil found within the project site. During review of the United States Department of

Agriculture (USDA) Natural Resources Conservation Service WebSoil Survey (USDA 2024), it was determined that no digital soils data were available for the project site and the surrounding areas. Soils observed on the site varied from sandy loam to loamy sand.

RECONNAISSANCE FIELD SURVEY

LSA Biologists Stanley Spencer, Christina Van Oosten, and Julia Lung conducted a general reconnaissance-level, pedestrian field survey and plant survey on May 7, 2024, between 0945 and 1150 hours. All areas within the 4.34-acre project site were surveyed on foot, and binoculars were used to aid in the identification of animal species. Notes were taken on general site conditions, vegetation, and suitability of habitat for various special-status elements. Weather conditions during the survey included temperatures ranging from 70 to 77 degrees Fahrenheit, with sunny skies, no precipitation, and 0 to 3 mile-per-hour winds.

JURISDICTIONAL FEATURES

The project site was assessed for areas that may potentially be considered jurisdictional wetlands, waters of the United States, or streambeds/habitats as defined by the USACE, RWQCB, and CDFW, respectively.

VEGETATION

All plant species observed within the project site were recorded. Vegetation communities within the project site were identified and qualitatively described. Plant communities were determined in accordance with *A Manual of California Vegetation*, Second Edition (Sawyer et al. 2009). Plant nomenclature follows that of *The Jepson Manual*, Second Edition (Baldwin et al. 2012). A comprehensive list of the plant species observed during the survey is provided in Appendix B.

The Joshua tree census survey was conducted to comply with the permitting requirements of the Western Joshua Tree Conservation Act (WJTCA) and CDFW guidelines.

WILDLIFE

All wildlife and wildlife signs observed and detected, including tracks, scat, carcasses, burrows, excavations, and vocalizations, were recorded. Additional survey time was spent in those habitats most likely to be utilized by wildlife (native vegetation, wildlife trails, etc.) or in habitats with the potential to support State- and/or Federally listed or otherwise special-status species. Notes were made on the general habitat types, species observed, and the conditions of the project site. A comprehensive list of the wildlife species observed during the survey is provided in Appendix C. Representative photographs of the project site that document existing conditions are provided in Appendix D.

RESULTS

LITERATURE REVIEW RESULTS

According to the records collected from relevant literature and databases, 32 special-status species (15 plant species and 17 animal species), 9 of which are Federally or State listed as threatened, endangered, or fully protected, or are candidates for listing, have been documented or may be expected in the project vicinity.

An analysis of the likelihood of the occurrence of these species is provided in Table A. This analysis takes into account species range as well as documentation within the vicinity of the project site and includes the habitat requirements for each species and the potential for their occurrence on the site, based on required habitat elements and range relative to the current site conditions. No USFWS-designated critical habitat occurs within or adjacent to the project site. CDFW natural communities of concern are discussed below.

EXISTING SITE CONDITIONS

Topography and Soils

The elevation of the project site ranges from approximately 3,710 to 3,726 ft above mean sea level (amsl). Review of the USDA Natural Resources Conservation Service WebSoil Survey resulted in soils within the project site and the surrounding areas as not being defined. Based on the May 7, 2024, field survey, soil types were identified as sandy loam and loamy sand.

Vegetation and Land Cover

Vegetation on the site consists of disturbed Joshua tree woodland (*Yucca brevifolia* Woodland Alliance) and was classified using *A Manual of California Vegetation*, Second Edition (Sawyer et al. 2009) (Appendix A, Figure 3). Dirt roads have been present with the current configurations since at least 1989 based on historic aerial imagery (Google Earth, 1989, 1995). Dominant vegetation within Joshua tree woodland includes western Joshua tree (*Yucca brevifolia*), Mojave yucca (*Yucca schidigera*), creosote bush (*Larrea tridentata*), Mediterranean grass (*Schismus* sp.), red brome (*Bromus ruben*), Sahara mustard (*Brassica tournefortii*), shortpod mustard (*Hirschfeldia incana*), and redstem stork's bill (*Erodium cicutarium*). No other plant communities are present on the site.

Table A: Special-Status Species Occurrence Probability

Species	Status	Habitat and Distribution	Activity Period	Occurrence Probability
Plants				
Astragalus bernardinus **San Bernardino milk-vetch**	US: – CA: 1B	Granitic or carbonate (limestone) substrates in Joshua tree woodland and pinyon and juniper woodland at 900 to 2,290 meters (2,950 to 7,500 feet) elevation. Occurs only in Riverside and San Bernardino Counties, in the San Bernardino, New York, and Ivanpah Mountains.	Blooms April through June (perennial herb)	**Not Expected:** No granitic or carbonate substrates were found on the site. Species not identified during May 2024 floristic survey.
Astragalus tricarinatus **Triple-ribbed milk-vetch**	US: FE CA: 1B	Metamorphic rock outcrops weathering into gravelly soil in semi-desert chaparral, or (probably as waifs) at the edges of boulder-strewn desert washes and adjacent slopes in rocky incised canyons in Joshua tree woodland and Sonoran Desert scrub; known from west edge of desert at 450 to 1,200 meters (1,500 to 3,900 feet) elevation in Riverside and extreme southern San Bernardino Counties.	Blooms February through May (perennial herb)	**Not Expected:** No metamorphic rock outcrops or other habitat features on site. Species not identified during May 2024 floristic survey.
Berberis fremontii **Fremont barberry**	US: – CA: 2B	Rocky sites in chaparral, Joshua tree, pinyon and juniper woodland at elevations of 840 to 1,850 meters (2,750 to 6,070 feet).	Blooms April through June (perennial evergreen shrub)	**Not Expected:** No rocky areas on site. Species not identified during May 2024 floristic survey.
Boechera dispar **Pinyon rock cress**	US: – CA: 2B	Granitic, gravelly slopes and mesas in Joshua tree woodland, pinyon-juniper woodland, and Mojave Desert scrub at 1,200 to 2,400 meters (4,000 to 7,900 feet) elevation. In California, known from Inyo, Mono, San Bernardino, and Tulare Counties.	Blooms March through June (perennial herb)	**Not Expected:** No granitic, gravelly slopes on site. Species not identified during May 2024 floristic survey.
Boechera shockleyi **Shockley's rock cress**	US: – CA: 2B	Limestone or quartzite on ridges, rocky outcrops, or in openings in pinyon-juniper woodland at 875 to 2,205 meters (2,900 to 7,200 feet) in elevation. In California, known only from Inyo and San Bernardino counties.	Blooms May through June (perennial herb)	**Not Expected:** No suitable habitat on ridges, rocky outcrops, or pinyon-juniper woodland on site. Species not identified during May 2024 floristic survey.
Calochortus palmeri var. *palmeri* **Palmer's mariposa-lily**	US: – CA: 1B	Mesic sites in chaparral and lower montane coniferous forest at 600 to 2,400 meters (2,000 to 7,900 feet) in elevation. Known from Riverside, San Bernardino, Santa Barbara, Los Angeles, Ventura, Kern, and San Luis Obispo counties.	Blooms April through July (perennial herb)	**Not Expected:** No mesic areas, chaparral, or coniferous forest on site. Species not identified during May 2024 floristic survey.

Cymopterus multinervatus **Purple-nerve cymopterus**	US: – CA: 2B	Sandy or gravelly slopes, rocky outcrops, along ridges in Mojavean desert scrub and pinyon and juniper woodland at 765 to 2,195 meters (2,500 to 7,200 feet) in elevation. In California, known only from Inyo, Riverside, and San Bernardino counties. Also occurs in Arizona, Nevada, New Mexico, Texas, Utah, and Mexico.	Blooms March through April (perennial herb)	**Not Expected:** Site is outside the known range of this species. Nearest location is a 1978 collection about 12 miles north of the project site at the south end of its known range. Species not identified during May 2024 floristic survey; would have been detectable as a perennial even if past flower.
Erigeron parishii **Parish's daisy**	US: FT CA: 1B	Generally found on or near carbonates (e.g. limestone); usually on steep rocky slopes, or in washes or on adjacent benches in canyons; usually in pinyon woodland, pinyon-juniper woodland, or blackbrush scrub at 800 to 2,000 meters (2,600 to 6,600 feet) in elevation (usually above 3,600 feet). Known only from San Bernardino and Riverside counties.	Blooms May through June (perennial herb)	**Not Expected:** Site is outside the known range of this species, which occurs in mountainous areas to the west. No carbonates or other suitable habitat areas on site.
Grusonia parishii **Parish's club-cholla**	US: – CA: 2B	Sandy or rocky areas in Mojavean desert scrub, Sonoran desert scrub, Joshua tree woodland at 300 to 1,524 meters (985 to 5,000 feet) in elevation. In California, known only from Riverside and San Bernardino counties. Also occurs in Arizona, Nevada, and possibly Texas.	Blooms May through June or July (perennial stem succulent)	**Not expected:** Site is outside the known range of this species. Nearest locations are 1932 collections from about 7 miles southeast of the site. Species not identified during May 2024 floristic survey; readily detected year-round.
Linanthus bernardinus **Pioneertown linanthus**	US: – CA: 1B	Joshua tree woodland and pinyon and juniper woodland at 1,120 to 1,345 meters (3,670 –4,410 feet). Known only from the Sawtooth Range in San Bernardino County.	Blooms March through May (annual herb)	**Not Expected:** Project site is outside the known range of this species (Sawtooth Mountains). Not identified during May 2024 floristic survey.
Linanthus maculatus ssp. *maculatus* (*Gilia maculata*) **Little San Bernardino Mountains linanthus**	US: – CA: 1B	Loose, well-aerated sand on wash-margin benches with few or no competing species and void of large shrubs or trees, in areas of desert dune, desert scrub, and Joshua tree woodland at 195 to 2,075 meters (600 to 6,800 feet) elevation. Loosely associated shrubs include creosote bush (Larrea tridentata), brittle bush (Encelia farinosa), burro bush (Ambrosia dumosa), cheesebush (Hymenoclea salsola) and desert catalpa (Chilopsis linearis). Not found in loose sands away from washes, nor in dense stands of weedy annuals. Known only from Riverside and San Bernardino Counties. Known only from edges of washes associated with the San Bernardino	Blooms March through May (annual herb)	**Not Expected:** No wash margin benches on site. Not identified during May 2024 floristic survey.

		Mountains (north and east sides), the Little San Bernardino Mountains, and the northern part of the Coachella Valley.		
Monardella robisonii **Robinson's monardella**	US: – CA: 1B	Rocky, granitic slopes often among boulders in pinyon-juniper woodland and Joshua tree woodland at 610 to 1,525 meters (2,000 to 5,000 feet) elevation. In California, known only from the immediate vicinity of the Little San Bernardino Mountains in Riverside and San Bernardino Counties.	Blooms in April through October (perennial herb)	**Not Expected:** No rocky, granitic slopes on site. Not identified during May 2024 floristic survey.
Penstemon clevelandii var. *mohavensis* **Mohave beardtongue**	US: – CA: 1B	Rocky, often granitic areas in Mojavean desert scrub and pinyon and juniper woodland at 925 to 1,620 meters (3035 to 5,315 feet) in elevation. Known only from Riverside and San Bernardino Counties, California.	Blooms March through May (perennial herb)	**Not expected:** No rocky areas on site. Not identified during May 2024 floristic survey.
Saltugilia latimeri **Latimer's woodland gilia**	US: – CA: 1B	Dry desert slopes of coarse sandy to rocky soils in chaparral and Mojavean desert scrub at 400 to 1,900 meters (1,300 to 6,200 feet) elevation.	Blooms March through June (annual herb)	**Not Expected:** No slopes with coarse sandy to rocky soils on site. Not identified during May 2024 floristic survey.
Yucca brevifolia **Western Joshua tree**	US: – CA: SCT/SCE	Various plant communities from Sonoran Desert scrub to yellow pine forest in desert and desert edge areas (up to about 6,600 feet elevation in California). In California, known from Kern, San Bernardino, Los Angeles, Riverside, Inyo, and Mono Counties. Also occurs in Nevada, Utah, and Arizona.	Blooms March through June (perennial evergreen tree)	**Present:** Project site contains 98 individual trees.
Insects				
Danaus plexippus plexippus pop. 1 **Monarch butterfly (California overwintering population)**	US: FPT CA: SA	Overwintering habitat is located in wind-protected tree groves (eucalyptus, Monterey pine, Monterey cypress) with nectar and water sources nearby. The majority of the overwintering habitat sites are located within 1.5 miles of the Pacific Ocean or San Francisco Bay. Sites are typically found at low elevations (200 to 300 feet) and situated on slopes oriented to the south, southwest or west, or in shallow canyons or gullies. The sites need to have dappled sunlight, high humidity, fresh water, and an absence of freezing temps or high winds. Monarchs breed only where milkweeds are found. They forage on a wide variety of flowers.	September through March at overwintering sites	**No wintering or breeding habitat present.** Monarch may move through the site during migration or occasionally forage on the site comparable to its use of desert and urban ornamental vegetation throughout the region.

Bombus crotchii **Crotch's bumble bee**	US: – CA: SCE	Inhabits open scrub (including chaparral) and grassland with high floral diversity from coastal California to the crest of Sierra-Cascade and in desert edge areas, south into Mexico. Suitable bumble bee habitat requires the continuous availability of sufficient flowers suitable for foraging to sustain the colony throughout its duration (spring through summer), as well as sites suitable for colony nesting and for overwintering of the new queens. Preferred foraging plants of this species include milkweeds (*Asclepias* spp.), phacelias (*Phacelia* spp.), sages (*Salvia* spp.), vetches (*Vicia* spp.), deerweed (*Acmispon glaber*), lupines (*Lupinus* spp.), and poppies (*Eschscholzia spp.*) (Robert Thorpe et al, 1983, *Bumble Bees and Cuckoo Bumble Bees of California*). Nests underground in abandoned rodent burrows but may also nest in other cavities such as rock piles, fallen logs, or thatched grasses (California Department of Fish and Wildlife, *Survey Considerations for California Endangered Species Act [CESA] Candidate Bumble Bee Species)*. Overwintering is poorly understood but likely includes sloping areas insulated with leaf litter under trees or large shrubs (*ibid*.).	Spring and summer	**Low.** This species occurs infrequently in the desert but habitat appears potentially suitable.
Paranomada californica **California cuckoo bee**	US: – CA: SA	Parasitic on other bees. Occurs within desert scrub, but habitat requirements are unknown. The California Natural Diversity Database (CNDDB) has only two occurrence records for this species: a 1971 record from near Pioneertown, San Bernardino County, and a 1944 record from the vicinity of Yucca Valley, San Bernardino County.	Spring and summer	**Not exptected.** There are no recent records of this species in the region and habitat on the site is unexceptional compared with the overall desert habitat in the region.
Reptiles				

Anniella stebbinsi **Southern California legless lizard**	US: – CA: SSC	Inhabits sandy or loose loamy soils with high moisture content under sparse vegetation. Found primarily in cismontane southern California from Santa Barbara County to northwestern Baja California, with a few outlying populations in the deserts of southern California.	Nearly year round, at least in southern areas	**Not expected.** No areas with moist, loose soil on site.
Crotalus ruber **Red diamond rattlesnake**	US: – CA: SSC	Desert scrub, thornscrub, open chaparral and woodland; occasional in grassland and cultivated areas. Prefers rocky areas and dense vegetation. Morongo Valley in San Bernardino and Riverside counties to the west and south into Baja California.	Primarily Mid-spring through mid-fall	**Not expected.** Site is outside the expected range of this species and lacks rocky habitat.
Gopherus agassizii **Desert tortoise**	US: FT CA: ST	Historically found throughout most of the Mojave and Sonoran Deserts into Arizona, Nevada, and Utah. Believed to have been extirpated from the western and southern portions of the Antelope Valley. Found in creosote bush scrub, saltbush scrub, thornscrub (in Mexico), and Joshua tree woodland. Found in the open desert as well as in oases, riverbanks, washes, dunes, and occasionally rocky slopes.	Spring, and again in early fall in areas of summer rains, with brief periods of activity at other times	**Low:** Suitable habitat is present within the project site. However, no suitable burrows or sign of this species occurred on site during the May 2024 field survey. Two CNDDB records occur approximately 2 miles southwest of the project site, west of SR-247.
Phrynosoma blainvillii (coronatum) **Coast horned lizard**	US: – CA: SSC	Primarily in sandy soil in open areas, especially washes and floodplains, in many plant communities. Requires open areas for sunning, bushes for cover, patches of loose soil for burial, and an abundant supply of ants or other insects. Occurs west of the deserts from northern Baja California north to Shasta County below 2,400 meters (8,000 feet) in elevation.	Primarily April through July with reduced activity August through October	**Low to Moderate:** This species was not observed during any of the site visits, but portions of the site may be suitable.
Uma scoparia **Mojave fringe-toed lizard**	US: – CA: SSC	Requires fine wind-blown sand, generally in relatively sparse creosote scrub on loose sand dunes with sand grains <0.5 mm. Not present where sand is too firm for sand swimming; and washes and desert flats are generally unsuitable. Patchily distributed in Mojave Desert areas of Los Angeles, Riverside, and San Bernardino counties. Also occurs in Arizona.	March to October (breeding April to July)	**Not expected:** Site lacks dunes or similar habitat.
Birds				
Athene cunicularia (burrow sites)	US: – CA: SSC/SCT/SCE	Open country in much of North and South America. Usually occupies ground squirrel burrows in open, dry grasslands, agricultural and range lands, railroad	Year-round	**Low:** Suitable habitat is present within the project site. Species is common in the area. However, during the time of

Burrowing owl		rights-of-way, and margins of highways, golf courses, and airports. Often utilizes man-made structures, such as earthen berms, cement culverts, cement, asphalt, rock, or wood debris piles. They avoid thick, tall vegetation, brush, and trees, but may occur in areas where brush or tree cover is less than 30 percent.		the May 2024 field survey the project site was highly vegetated with no suitable burrows or sign of this species. One CNDDB record occurs approximately 6.5 miles east of the project site.
Lanius ludovicianus (nesting) **Loggerhead shrike**	US: – CA: SSC (breeding)	Prefers open habitats with scattered small trees and with fences, utility lines, or other perches. Inhabits open country with short vegetation, pastures, old orchards, cemeteries, golf courses, riparian areas, and open woodlands. Highest density occurs in open-canopied valley foothill hardwood, valley foothill hardwood-conifer, valley foothill riparian, pinyon-juniper, juniper, desert riparian, and Joshua tree habitats. Occurs only rarely in heavily urbanized areas, but often found in open cropland. Found in open country in much of North America.	Year-round	**Present:** Adults and fledglings were observed adjacent to the project site during the May 2024 field survey.
Setophagia petechia (nesting) **Yellow warbler**	US: – CA: SSC (breeding)	Nests primarily in riparian woodland. More widespread in brushy habitats, woodland, and forest during migration and in winter. Nests across much of North America from Alaska and Northwest Territories to central Mexico. Winters primarily from Mexico to northern South America.	April through September, rare in winter.	**Not expected:** No riparian habitat on site.
Toxostoma bendirei **Bendire's thrasher**	US: BCC CA: SSC (breeding)	Inhabits Joshua tree woodland with scattered desert shrubs such as creosote bush and sweet bush. Also occurs in the eastern Mojave in areas with plentiful cholla (*Cylindropuntia* spp.) (Garret and Dunn 1981). Common summer resident in Joshua Tree National Monument (Remsen 1978).	April through September, rare in winter.	**Low:** Habitat (Joshua tree woodland) present with the project site may be suitable. Species not detected during May 2024 field survey. There are two CNDDB records of observations of this species in 1991 from approximately 12 miles north northwest of the project site.
Toxostoma lecontei	US: BCC CA: SSC	Inhabits sparsely vegetated desert flats, dunes, alluvial fans, or gently rolling hills having a high proportion of saltbush (Atriplex spp.) or cholla (Cylindropuntia spp.), often occurring along small washes or sand dunes. Prefers dense thorny shrubs (most often saltbush or cholla) for nesting. Uncommon and local resident in low desert scrub throughout most of the Mojave Desert, extending up	Year-round	**Low:** Suitable habitat (desert scrub) present with the project site may be suitable. Species not detected during May 2024 field survey. Two CNDDB records occur approximately 2 miles west and north of the project site.

		into the southwestern corner of the San Joaquin Valley. Breeding range in California extends from these areas into eastern Mojave, north into the Owens Valley and south into the lower Colorado Desert and eastern Mojave. Only the San Joaquin Valley population of this species is considered a BLM Sensitive species or California Species of Concern.		
Vireo bellii pusillus **Least Bell's vireo**	US: FE CA: SE	Riparian forests and willow thickets. The most critical structural component of Least Bell's Vireo habitat in California is a dense shrub layer 2 to 10 feet (0.6–3.0 meter) above ground. Willows usually dominant. Nests from central California to northern Baja California Sur. Winters primarily in Baja California Sur.	March through September	**Not expected:** No riparian habitat on site.
Mammals				
Lasiurus xanthinus **Western yellow bat**	US: – CA: SSC	Found mostly in desert and desert riparian areas of the southwest US, but also expanding its range with the increased usage of native and non-native ornamental palms in landscaping. Individuals typically roost amid dead fronds of palms but have also been documented roosting in cottonwood trees. Forage over many habitats.	Year-round; nocturnal	**Not expected**: No palms or other typical roosting habitat on site; may occasionally forage over site.
Ovis canadensis nelsoni (excluding peninsular Distinct Population Segment) **Desert bighorn sheep**	US: – CA: CFP (except rams when hunting is authorized) BLM: S	Occurs in open, rocky, steep areas with available water and herbaceous forage; widely distributed from the White Mountains in Mono County to the Chocolate Mountains in Imperial County.	Year-round	**Not expected**: No rocky, steep habitat areas on site.

Taxidea taxus **American badger**	US: – CA: SSC	Primary habitat requirements seem to be sufficient food and friable soils in relatively open uncultivated ground in grasslands, woodlands, and desert. Widely distributed in North America.	Year-round	**Not expected:** Marginally suitable (friable soils) habitat is present on site. However, no suitable burrows or sign for this species were detected during the May 2024 field survey. Site is small and not expected to provide enough food. One CNDDB record occurs approximately 7 miles west of the project site, west of SR-247.

Source: Compiled by LSA (2024).

US: Federal Classifications

FE Listed as Endangered.
FT Listed as Threatened.
FPE Proposed for listing as Endangered.
FPT Proposed for listing as Threatened.
FPD Proposed for delisting.
FC Candidate for listing as Threatened or Endangered.
BCC Bird of Conservation Concern

CA: State Classifications

SE State-listed as Endangered.
ST State-listed as Threatened.
SR State-listed as Rare.
SCE Candidate for State-listing as Endangered.
SCT Candidate for State-listing as Threatened.
SC Candidate for State-listing as Threatened or Endangered.
SSC Species of Special Concern. Refers to animals with vulnerable or seriously declining populations.
CFP California Fully Protected. Refers to animals protected from take under Fish and Game Code sections 3511, 4700, 5050, and 5515.
SA Special Animal. Refers to any other animal monitored by the Natural Diversity Data Base, regardless of its legal or rarity status.
1A California Rare Plant Rank 1A – presumed extinct in California.
1B California Rare Plant Rank 1B – rare, threatened or endangered in California and elsewhere.
2B California Rare Plant Rank 2B – rare, threatened or endangered in California, but more common elsewhere.
3 California Rare Plant Rank 3 – a review list of plants about which more information is needed.
4 California Rare Plant Rank 4 – a watch list of plants of limited distribution.

MSHCP: Western Riverside County MSHCP Status

C Species is covered and adequately conserved under the MSHCP.
S Species is covered and adequately conserved under the MSHCP, but surveys are required within indicated habitats and/or survey areas.
P Species is covered and will be adequately conserved when MSHCP specified requirements are met.

CNDDB = California Natural Diversity Database

A census of Joshua trees was conducted on November 1, 2023, by LSA biologists Stan Spencer, Christina Van Oosten, and Eva Newby. The census survey resulted in a total of 98 Joshua trees present within the site and buffer area (Appendix E). A total of 35 vascular plant species were identified within the project site during the May 7, 2024, field survey. Appendix F can be referenced for the findings of the spring plant survey. See Appendix B for a complete list of plant species observed on site.

Wetlands and Other Jurisdictional Waters

The USACE, under Section 404 of the Federal Clean Water Act (CWA), regulates discharges of dredged or fill material into "waters of the United States." These waters include wetlands and non-wetland bodies of water that meet specific criteria, including a connection to interstate commerce. This connection may be direct (through a tributary system linking a stream channel with traditional navigable waters used in interstate or foreign commerce) or it may be indirect (through a connection identified in USACE regulations). The USACE typically regulates as non-wetland waters of the United States any body of water displaying an "ordinary high water mark." To be considered a "jurisdictional wetland" under Section 404, an area must possess hydrophytic vegetation, hydric soils, and wetland hydrology. The CDFW, under Sections 1600 et seq. of the California Fish and Game Code, regulates alterations to lakes, rivers, and streams. A stream is defined by the presence of a bed, channel, and banks and at least an occasional flow of water. The RWQCB is responsible for the administration of Section 401 of the CWA through water quality certification of any activity that may result in a discharge to jurisdictional waters of the United States. The RWQCB may also regulate discharges to "waters of the State," including wetlands, under the California Porter-Cologne Water Quality Control Act.

No drainage features, ponded areas, wetlands, or riparian habitat subject to jurisdiction by the CDFW, USACE, and/or RWQCB were found within the project site. Neither CWA Section 404 and 401 permits nor a CDFW Streambed Alteration Agreement is necessary. The findings represent the professional opinion of LSA and are subject to verification by the regulatory agencies.

Wildlife

The abundant Joshua trees and yucca within the project site are considered potential habitat for some native wildlife species, especially birds. There are many trees on the project site that could significantly contribute to nesting, and could be directly impacted by the proposed development. A total of 9 wildlife species were observed in (or foraging over) the project parcel during the May 2024 general field survey: California quail *(Callipepla californica),* mourning dove *(zenaida macroura),* turkey vulture *(Cathartes aura),* loggerhead shrike *(Lanius ludovicianus),* common raven *(Corvus corax),* house sparrow *(Passer domesticus),* house finch *(Haemorhous mexicanus),* San Diegan tiger whiptail *(Aspidoscelis tigris stejnegeri),* desert cottontail *(Sylvilagus audubonii).* Other common desert wildlife species of the region are also expected to occur on site. One special-status species, loggerhead shrike, was observed during the field survey.

Special-Status Species

This section discusses special-status species potentially occurring within the limits of the project site. Legal protection for special-status species varies widely, from the comprehensive protection

extended to listed threatened/endangered species to no legal status at present. The CDFW, USFWS, local agencies, and special-status groups such as CNPS publish watch lists of declining species.

The special-status species analysis in Table A includes species that are listed as threatened or endangered by the State or Federal government or fully protected by the State, candidates for State and/or ederal listing, and other species considered rare, threatened, or endangered by CDFW or CNPS, including animals designated by CDFW as California Species of Special Concern and other species that are unique to a region or listed as of concern by a local jurisdiction. Inclusion of species described in the special-status species analysis is based on the following criteria:

- Direct observation of the species or its sign on the project site or immediate vicinity during previous biological studies;
- Sighting by other qualified observers;
- Records reported by the CNDDB and published by the CDFW;
- Presence or location information for specific species provided by private groups (e.g., CNPS); and
- Project site lies within known distribution of a given species and contains appropriate habitat.

Table A summarizes special-status species known to occur in the region.

Threatened and Endangered Species

Under provisions of Section 7(a)(2) of the FESA, a Federal agency that permits, licenses, funds, or otherwise authorizes a project activity must consult with the USFWS to ensure that its actions would not jeopardize the continued existence of any listed threatened or endangered species or destroy or adversely modify critical habitat. The USFWS designates as threatened or endangered species that are at risk of extinction and may also adopt recovery plans that identify specific areas that are essential to the conservation of a listed species. Critical habitat areas that may require special management considerations or protections can also be designated.

The CESA is administered by the CDFW and prohibits the "take" of plant and animal species identified as either threatened, endangered, or candidates for listing in the State of California by the Fish and Game Commission (Fish and Game Code Sections 2050 to 2097). "Take" is defined as to hunt, pursue, catch, capture, or kill. Sections 2091 and 2081 of CESA allow the CDFW to authorize exceptions to the prohibition of "take" for purposes such as public and private development. The CDFW requires formal consultation to ensure that a proposed project's actions would not jeopardize the continued existence of any listed species or destroy or adversely affect listed species' habitats.

As identified in Table A, the following Federally/State-listed species or candidates for state listing have the potential to occur on the project site based on the literature review:

- Triple-ribbed milk-vetch (*Astragalus tricarinatus*): Federally listed as endangered, California Rare Plant Rank (CRPR) 1B;

- Parish's daisy (Erigeron parishii): Federally listed as threatened, CRPR 1B;
- Western Joshua tree: State candidate for listing as threatened or endangered;
- Monarch butterfly (*Danaus plexippus plexipus*, western population): Federally proposed for listing as threatened;
- Crotch's bumble bee (Bombus crotchii): State Candidate for listing as endangered;
- Desert tortoise (*Gopherus agassizii*, [DETO]): Federally and State-listed as threatened;
- Burrowing owl (*Athene cunicularia*, [BUOW]): State Candidate for listing as threatened or endangered, California Species of Special Concern (SSC);
- Least Bell's vireo (Vireo bellii pusillus): Federally and State-listed as endangered; and
- Desert bighorn sheep (*Ovis canadensis nelsonii*): State-listed as fully protected.

The project site may provide low quality habitat for desert tortoise, Crotch's bumble bee, or burrowing owl. Monarch butterfly may move through the site for migration or occasionally forage on the site, but the site does not have wintering or breeding habitat, and potential use for foraging would not be expected to exceed that of the overall desert or urban areas in the region; therefore, no substantial impacts to this species by the project are expected. Triple-ribbed milk-vetch, Parish's daisy, least Bell's vireo, and desert bighorn sheep are not expected based on lack of suitable habitat, while western Joshua tree is known to be present.

Non-Listed Special-Status Species

The other, non-listed, special-status plant species identified and discussed in Table A are not expected to occur on the project site based on habitat quality or geographic location, and none were observed during the floristic survey on May 7, 2024.

Three wildlife species, coast horned lizard (*Phrynosoma blainvillii*), Bendire's thrasher (*Toxostoma bendirei*) and Le Conte's thrasher (*Toxostoma lecontei*), have a low to moderate potential of occurring on site. One special-status bird species, loggerhead shrike, was observed during the field survey. None of the other non-listed special-status species are expected to occur on the site. The project site has suitable vegetation that could support nesting birds.

Natural Communities of Concern

Riparian habitats, oak woodlands, and vernal pools are among some of the natural communities of interest to the CDFW. In addition, CDFW maintains a list of natural communities occurring in the State and identifies those that are sensitive as having ranks of S1–S3.

The CDFW CNDDB database search did not list any communities of concern occurring within the project site or its immediate surroundings. The western Joshua tree census survey, conducted on November 1, 2023, noted the occurrence of disturbed Joshua tree woodland within the entirety of

the project site. Joshua tree woodland has a rank of S3, Vulnerable. The habitat within the project site contains a mostly non-native understory and is dominated by western Joshua tree. Refer to Appendix E Joshua Tree Report. This habitat will be directly impacted by project activities taking place within the site. No other natural communities of concern, including those that have a State rank of S1-S3, are present within the site.

IMPACT FINDINGS

VEGETATION AND HABITAT IMPACTS

The project would result in direct impacts to native habitats and/or sensitive natural communities in the form of Joshua tree woodland. This species is discussed below.

THREATENED AND ENDANGERED SPECIES

One State-listed species, western Joshua tree, was observed during the November 1, 2023, field survey. Two Federal and/or State-listed animal species have a low potential of occurrence on the project site.-No other listed plant or animal species were observed during the site surveys.

Western Joshua Tree

Direct impacts to western Joshua tree are expected with project implementation. Western Joshua tree is known to commonly occur within the general project vicinity. The Joshua tree census conducted on November 1, 2023, resulted in 98 individual trees within the project site and the buffer area. LSA recommends the following impact avoidance measure:

- **Joshua Tree Incidental Take Permit.** An incidental take permit (ITP) application under the Western Joshua Tree Conservation Act (WJTCA) shall be submitted to and approved by the California Department of Fish and Wildlife (CDFW) for any unavoidable impacts to western Joshua tree (*Yucca brevifolia*), prior to the onset of construction activities.

Desert Tortoise

The project site is within the range of DETO. Direct impacts to desert tortoise may occur with project implementation. No DETO, their sign, or suitable burrows were observed during the November 1, 2023 or May 7, 2024 site visits; however, focused surveys for this species were not conducted. LSA recommends the following impact avoidance measure:

- **Desert Tortoise Survey.** Prior to any vegetation or ground disturbance activities, surveys shall be conducted for the species according to the United States Fish and Wildlife's (USFWS) 2019 *Preparing for Any Action That May Occur Within the Range of the Mojave Desert Tortoise* (*Gopherus agassizii*) (USFWS 2019b). Should there be positive survey results, a Federal incidental take permit under Section 10 of FESA and State incidental take permit under Section 2081 of the Fish and Game Code would be required.

Crotch's Bumble Bee

The project site is within the range of Crotch's bumble bee, although this species occurs relatively infrequently in desert areas. Direct impacts to this may occur with project implementation. LSA recommends the following impact avoidance measure:

- **Crotch's Bumble Bee Survey:** To avoid impacts to Crotch's bumble bee, prior to vegetation removal or issuance of a grading permit, a qualified biologist shall conduct a focused Crotch's

bumble bee surveys to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance. The surveys shall consist of three separate visits spaced two to four weeks apart. The pre-construction survey shall be conducted between April 1 and June 15, early in the colony active period, prior to the issuance of the grading permit and within one year prior to the initiation of project activities (including removal of vegetation). The survey shall be conducted by a qualified biologist meeting the qualifications discussed in the California Department of Fish and Wildlife (CDFW) guidance (i.e., *Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species*, dated June 6, 2023) with a memorandum of understanding for Crotch's bumble bee surveys. The survey shall consist of photographic surveys conducted in accordance with the CDFW guidance. The qualified biologist shall send all photographic vouchers to a CDFW-approved taxonomist to confirm the identifications of the bumble bees encountered during surveys. Survey results will be considered valid until the start of the next colony active period (April 1 of the following year). The results of the pre-construction survey shall be submitted to the City. Survey data shall also be submitted by the qualified biologist to the California Natural Diversity Database, as applicable, in accordance with the requirements of the biologist's memorandum of understanding and scientific collecting permit with CDFW. If pre-construction surveys identify Crotch's bumble bee individuals on-site, the qualified biologist or project proponant shall notify and consult with CDFW to determine whether project activities would result in impacts to Crotch's bumble bee, in which case, an Incidental Take Permit may be required. If an Incidental Take Permit is required, it shall be obtained prior to issuance of the grading permit.

Burrowing Owl

Direct impacts to BUOW may occur with project implementation. BUOW is known to commonly occur within the general project vicinity. No BUOW, their sign, or suitable burrows were observed during the November 1, 2023 or May 7, 2024 site visits; however, focused surveys for this species and potential burrows were not conducted. At the time of the May 2024 survey, the Joshua tree woodland had a highly vegetated understory that may deter BUOW. LSA recommends the following impact avoidance measure:

- **Pre-Construction Presence/Absence Survey:** A burrowing owl take avoidance survey shall be performed by a qualified biologist not more than 14 days prior to any site disturbance (grubbing, grading, and construction) in accordance with California Department of Fish and Wildlife (CDFW) guidelines (*Staff Report on Burrowing Owl Mitigation,* March 7, 2012). If an occupied burrow is found (as indicated by the observation of a burrowing owl or the presence of burrowing owl sign), a 250-foot buffer around the burrow will be staked and flagged and no construction activities will be allowed within the buffer area during the breeding season (February 1 through August 31). If the burrow is within the project disturbance area, CDFW will be consulted to coordinate relocation of the owl in accordance with accepted protocols. Work on the site will be stopped until CDFW issues an Incidental Take Permit, or other resolution is determined. Non-Listed Special-Status Species

One non-listed animal species, loggerhead shrike, was observed during the May 7, 2024, field survey and is considered present. Three non-listed animal species, Le Conte's thrasher, Bendire's thrasher, and coast horned lizard, have a low (for Bendire's and Le Conte's thrashers) or low to moderate (for

coast horned lizard) potential of occurring within the project site. Given that these species are not listed as threatened or endangered and are widespread, and that the project size is relatively small, the project would not result in substantial impacts to these species. No other non-listed plant or animal species were observed during the site surveys nor are they anticipated to be adversely affected by the project.

Nesting Birds

Nesting birds protected by the MBTA and California Fish and Game Code may occur on site (potentially including Bendire's thrasher, Le Conte's thrasher and loggerhead shrike) and may be directly affected without avoidance and minimization measures. With successful implementation of the measures described below, impacts to nesting birds would be avoided, and no additional avoidance or minimization measures are warranted. LSA recommends the following impact avoidance measure:

- **Pre-Construction Nesting Bird Survey.** To ensure compliance with California Fish and Game Code and the Migratory Bird Treaty Act (MBTA) and to avoid potential impacts to nesting birds, vegetation removal activities shall be conducted outside the general bird nesting season (January 15 through August 31). Any vegetation removal and/or construction activities that occur during the nesting season will require that all suitable habitats be thoroughly surveyed for the presence of nesting birds by a qualified biologist. Prior to commencement of clearing, a qualified biologist shall conduct a pre-construction survey within 3 days prior to ground-disturbing activities. Should nesting birds be found, an exclusionary buffer will be established by the qualified biologist. The buffer may be up to 500 feet in diameter, depending on the species of nesting bird found. This buffer will be clearly marked in the field by construction personnel under guidance of the qualified biologist, and construction or clearing will not be conducted within this zone until the qualified biologist determines that the young have fledged or the nest is no longer active. The buffer may be modified and/or other recommendations proposed as determined appropriate by the biologist to minimize impacts. Nesting bird habitat within the project site will be resurveyed during bird breeding season if there is a lapse in construction activities longer than 7 days.

WILDLIFE MOVEMENT

Wildlife movement includes seasonal migration along corridors and daily movements for foraging. Migration corridors may include areas of unobstructed movement of deer, riparian corridors providing cover for migrating birds, routes between breeding waters and upland habitat for amphibians, and areas between roosting and feeding areas for birds.

The project site does not contain any essential connectivity areas, natural landscape blocks, natural areas small, or potential riparian connections, as documented in the California Essential Habitat Connectivity Project report (Spencer et al. 2010).

The project site is adjacent to existing commercial development and SR-247 that already restricts wildlife movement to the west and south in the project vicinity. The majority of wildlife movement within the project site is anticipated to be limited to wildlife present on site or within an adjacent

vacant lot to the east and north. The noise, vibration, light, dust, or human disturbance within construction areas would only temporarily deter wildlife from using areas in the immediate vicinity of construction activities. These indirect effects could temporarily alter migration behaviors, territories, or foraging habitats in select areas. However, because these are temporary effects, it is likely that wildlife already living and moving close to urban development would alter their normal functions for the duration of the project construction and then re-establish these functions once all temporary construction effects have been removed. Additionally, the proposed project's activities would not place any permanent barriers within any known wildlife movement corridors or interfere with habitat connectivity. Therefore, the proposed project would not substantially limit wildlife movement, and no mitigation is warranted.

OTHER STATE AND LOCAL POLICIES AND ORDINANCES PROTECTING BIOLOGICAL RESOURCES

Western Joshua Tree Conservation Act

The WJTCA is a law passed in California in July 2023 to set forth protections and guidelines for the western Joshua tree. The law prohibits the importation, export, take, possession, purchase, or sale of any western Joshua tree in California unless authorized by CDFW. The proposed project is in the standard fee area (not the reduced fee area), as these areas are defined in Fish and Game Code Section 1927.3 (d) and (e). The project must comply with the permitting requirements of the Western Joshua Tree Conservation Act and California Department of Fish and Wildlife guidelines. As noted above, an ITP application under the WJTCA is required prior to project implementation (see Mitigation Measure [MM] BIO-1). It should be noted that the CDFW has not entered into an agreement with any county or city to delegate limited authority to permit the taking of western Joshua tree. While the western Joshua tree is regulated under the Town of Yucca Valley Development Code Section 9.09.050, the WJTCA supersedes previous ordinances or policies put in place prior to its implementation.

California Desert Native Plants Act (CDNPA)

Division 23 of the California Food and Agriculture Code consists of the California Desert Native Plants Act (CDNPA). The CDNPA was developed to protect certain species of California desert native plants from unlawful harvesting on both public and private lands. This act protects all native cacti (family Cactaceae), Joshua tree and other yuccas (*Yucca* spp.), century plants (*Agave* spp.), nolinas (*Nolina* spp.), ocotillo (*Fouquieria splendens*), mesquites (*Prosopis* spp.), palos verdes (*Cercidium* spp.), elephant trees (*Bersura* sp.) crucifixion thorn (*Castela emoryi*), panamint dudleya (*Dudleya saxosa*), bristlecone pine (*Pinus longaeva*), California fan palm (*Washingtonia filifera*), catclaw (*Senegalia greggii*), desert-holly (*Atriplex hymemelytra*), smoke tree (*Dalea spinosa*), and desert ironwood (*Olneya tesota*). It should be noted that most of the species protected by CDNPA are not considered rare or special-status species. The CDNPA only applies within the boundaries of Imperial, Inyo, Kern, Los Angeles, Mono, Riverside, San Bernardino, and San Diego Counties. Within these counties, the CDNPA prohibits the harvest, transport, sale, or possession of these desert plants unless a person has a valid permit from the county sheriff or agricultural commissioner. Six species protected by the CDNPA were observed on the Project Site (see Appendix B): silver cholla (*Cylindropuntia echinocarpa*), diamond cholla (*Cylindropuntia ramosissima*), hedgehog cactus (*Echinocereus engelmannii*), catclaw (*Senegalia gregii*), western Joshua tree (*Yucca brevifolia*), and

Mojave yucca (*Yucca schidigera*). Western Joshua trees on the site were mapped as part of the Joshua tree census conducted for this project. The remaining five species will need to be surveyed on the Project Site as required for a permit under the CDNPA.

Town of Yucca Valley Development Code Section 9.09.050

Under the Town of Yucca Valley Ordinance, western Joshua tree, Mojave yucca, Parry's nolina (*Nolina parryi*), California juniper (*Juniperus californica*), Our Lord's candle (*Yucca whipplei*), and Pinon pine (*Pinus monophylla*) require a tree removal permit. Yucca Valley Development Code Section 9.09.050 requires mapping for any regulated native plant within 40 feet of ground disturbance within the project site. A photograph must be provided for each plant or plant cluster. The diameter of each plant or plant cluster and the approximate height of each plant or cluster should be included in the photo caption or in a separate table. A determination of general plant condition and whether the plant or cluster is likely to survive transplanting must also be provided.

Through project implementation, the project may conflict with local policies or policies related to biological resources for Mojave yucca and California juniper. With implementation of MM BIO-1, MM BIO-6, and MM BIO-7 the project would not conflict with other state and local policies or policies related to biological resources. The project is not subject to any other local policies or ordinances.

MITIGATION MEASURE SUMMARY

MM BIO-1 **Joshua Tree Incidental Take Permit.** An incidental take permit (ITP) application under the Western Joshua Tree Conservation Act (WJTCA) shall be submitted to and approved by the California Department of Fish and Wildlife (CDFW) for any unavoidable impacts to western Joshua tree (*Yucca brevifolia*), prior to its removal.

MM BIO-2 **Desert Tortoise Survey.** Prior to any vegetation or ground disturbance activities, surveys shall be conducted for the species according to the United States Fish and Wildlife's (USFWS) 2019 *Preparing for Any Action That May Occur Within the Range of the Mojave Desert Tortoise* (*Gopherus agassizii*) (USFWS 2019b). Should there be positive survey results, a Federal incidental take permit under Section 10 of the Federal Endangered Species Act (FESA) and State incidental take permit under Section 2081 of the Fish and Game Code would be required.

MM BIO-3 **Crotch's Bumble Bee Survey:** To avoid impacts to Crotch's bumble bee, prior to vegetation removal or issuance of a grading permit, a qualified biologist shall conduct a focused Crotch's bumble bee surveys to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance. The surveys shall consist of three separate visits spaced two to four weeks apart. The pre-construction survey shall be conducted between April 1 and June 15, early in the colony active period, prior to the issuance of the grading permit and within one year prior to the initiation of project activities (including removal of vegetation). The survey shall be conducted by a qualified biologist meeting the qualifications discussed in the California Department of Fish and Wildlife (CDFW) guidance (i.e., *Survey Considerations for California Endangered Species Act Candidate Bumble Bee*

Species, dated June 6, 2023) with a memorandum of understanding for Crotch's bumble bee surveys. The survey shall consist of photographic surveys conducted in accordance with the CDFW guidance. The qualified biologist shall send all photographic vouchers to a CDFW-approved taxonomist to confirm the identifications of the bumble bees encountered during surveys. Survey results will be considered valid until the start of the next colony active period (April 1 of the following year). The results of the pre-construction survey shall be submitted to the City. Survey data shall also be submitted by the qualified biologist to the California Natural Diversity Database, as applicable, in accordance with the requirements of the biologist's memorandum of understanding and scientific collecting permit with CDFW. If pre-construction surveys identify Crotch's bumble bee individuals on-site, the qualified biologist or project proponant shall notify and consult with CDFW to determine whether project activities would result in impacts to Crotch's bumble bee, in which case, an Incidental Take Permit may be required. If an Incidental Take Permit is required, it shall be obtained prior to issuance of the grading permit.

MM BIO-4 **Pre-Construction Burrowing Owl Survey.** A burrowing owl take avoidance survey shall be performed by a qualified biologist not more than 14 days prior to any site disturbance (grubbing, grading, and construction) in accordance with CDFW guidelines (*Staff Report on Burrowing Owl Mitigation*, March 7, 2012). If an occupied burrow is found (as indicated by the observation of a burrowing owl or the presence of burrowing owl sign), a 250-foot buffer around the burrow will be staked and flagged and no construction activities will be allowed within the buffer area during the breeding season (February 1 through August 31). If the burrow is within the project disturbance area, CDFW will be consulted to coordinate relocation of the owl in accordance with accepted protocols. Work on the site will be stopped until CDFW issues an Incidental Take Permit, or other resolution is determined. Determination of the appropriate method of relocation, such as eviction/ passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrows within that habitat) in coordination with the CDFW. Active relocation and eviction/passive relocation require the preservation and maintenance of suitable burrowing owl habitat determined through coordination with the CDFW.

MM BIO-5 **Pre-Construction Nesting Bird Survey.** To ensure compliance with the California Fish and Game Code and the Migratory Bird Treaty Act (MBTA) and to avoid potential impacts to nesting birds, vegetation removal activities shall be conducted outside the general bird nesting season (January 15 through August 31). Any vegetation removal and/or construction activities that occur during the nesting season will require that all suitable habitats be thoroughly surveyed for the presence of nesting birds by a qualified biologist. Prior to commencement of clearing, a qualified biologist shall conduct a pre-construction survey within 3 days prior to ground-disturbing activities. Should nesting birds be found, an exclusionary buffer will be established by the qualified biologist. The buffer may be up to 500 feet in diameter, depending on the species of nesting bird found. This buffer will be clearly marked in

the field by construction personnel under guidance of the qualified biologist, and construction or clearing will not be conducted within this zone until the qualified biologist determines that the young have fledged or the nest is no longer active. The buffer may be modified and/or other recommendations proposed as determined appropriate by the biologist to minimize impacts. Nesting bird habitat within the project site will be resurveyed during the bird breeding season if there is a lapse in construction activities longer than 7 days.

MM BIO-6 **Town of Yucca Valley Development Code Section 9.09.050**. A tree removal permit application under Development Code Section 9.09.050 shall be submitted to and approved by the Town of Yucca Valley for any unavoidable impacts to Mojave yucca and California juniper.

MM BIO-7 **California Desert Native Plants Act**. The Applicant shall obtain a permit from the San Bernardino County Agricultural Commissioner before disturbing or removing any CDNPA-protected plants from the Project Site.

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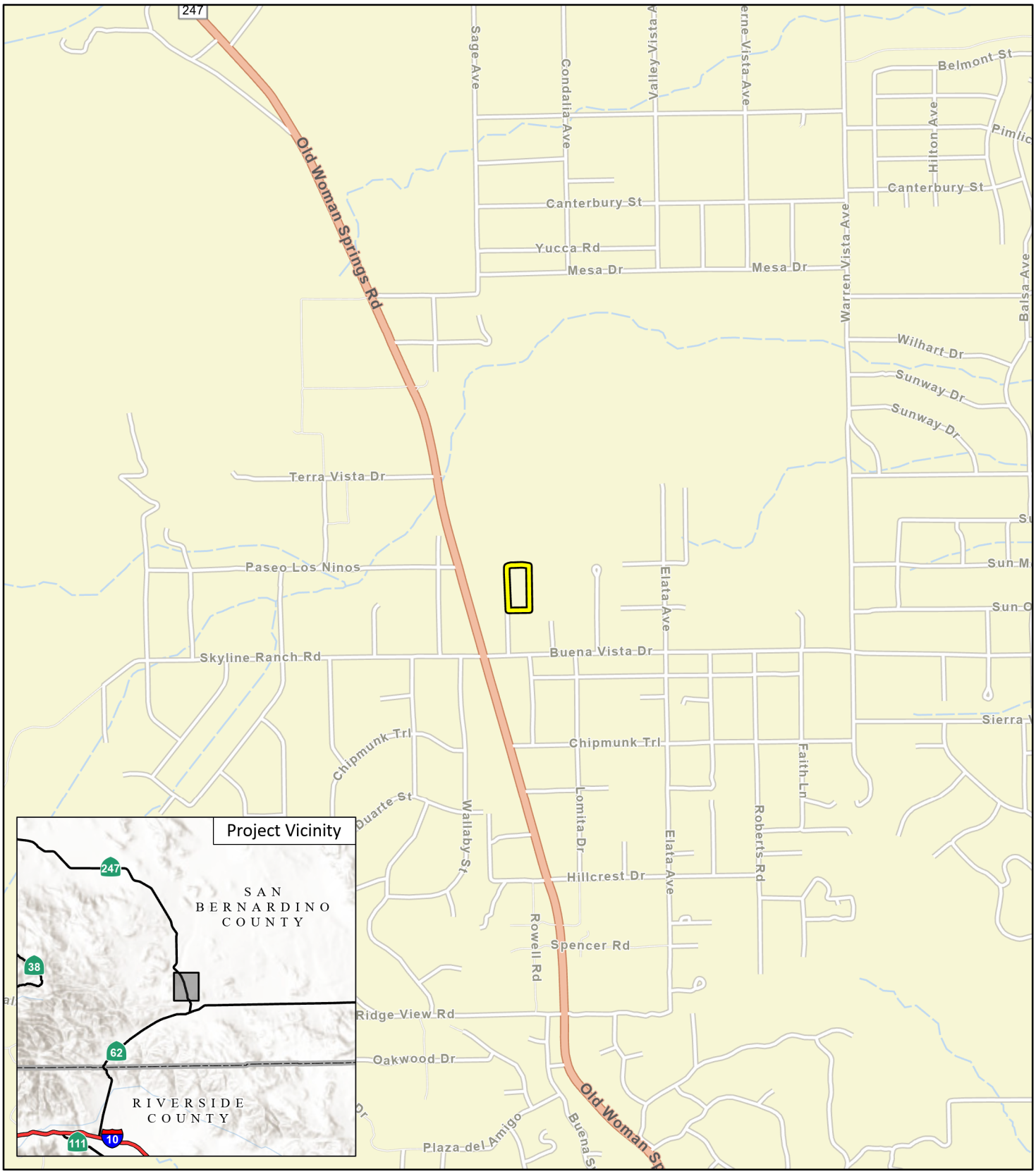
APPENDIX A

FIGURES 1–4



LSA

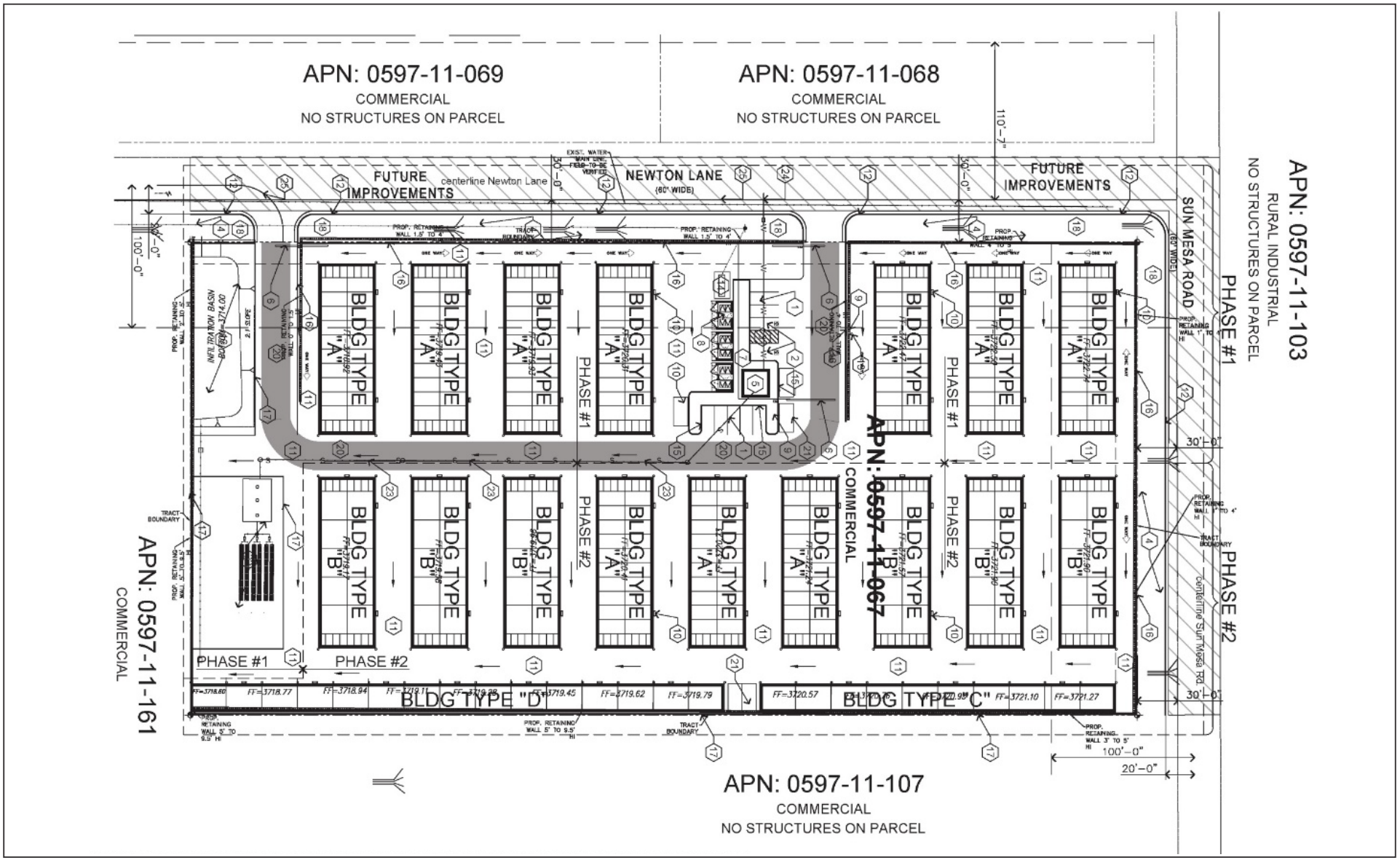
FIGURE 1

SOURCE: Esri (2024)

I:\20231230\GIS\Pro\Sun Mesa Mini Storage Project\Sun Mesa Mini Storage Project.aprx (7/9/2024)

Sun Mesa (Billings) Mini Storage Project

Project Location



LSA

FIGURE 2

0 50 100
FEET

SOURCE: Ultra Systems

I:\2025\20252490\G\Site_Plan.ai (7/25/2025)

Sun Mesa (Billings) Mini Storage Project
Site Plan

LSA

FIGURE 3

Project Area

Photo Points

Land Cover

Joshua Tree Woodland - 4.92 acres

N

0 15 30

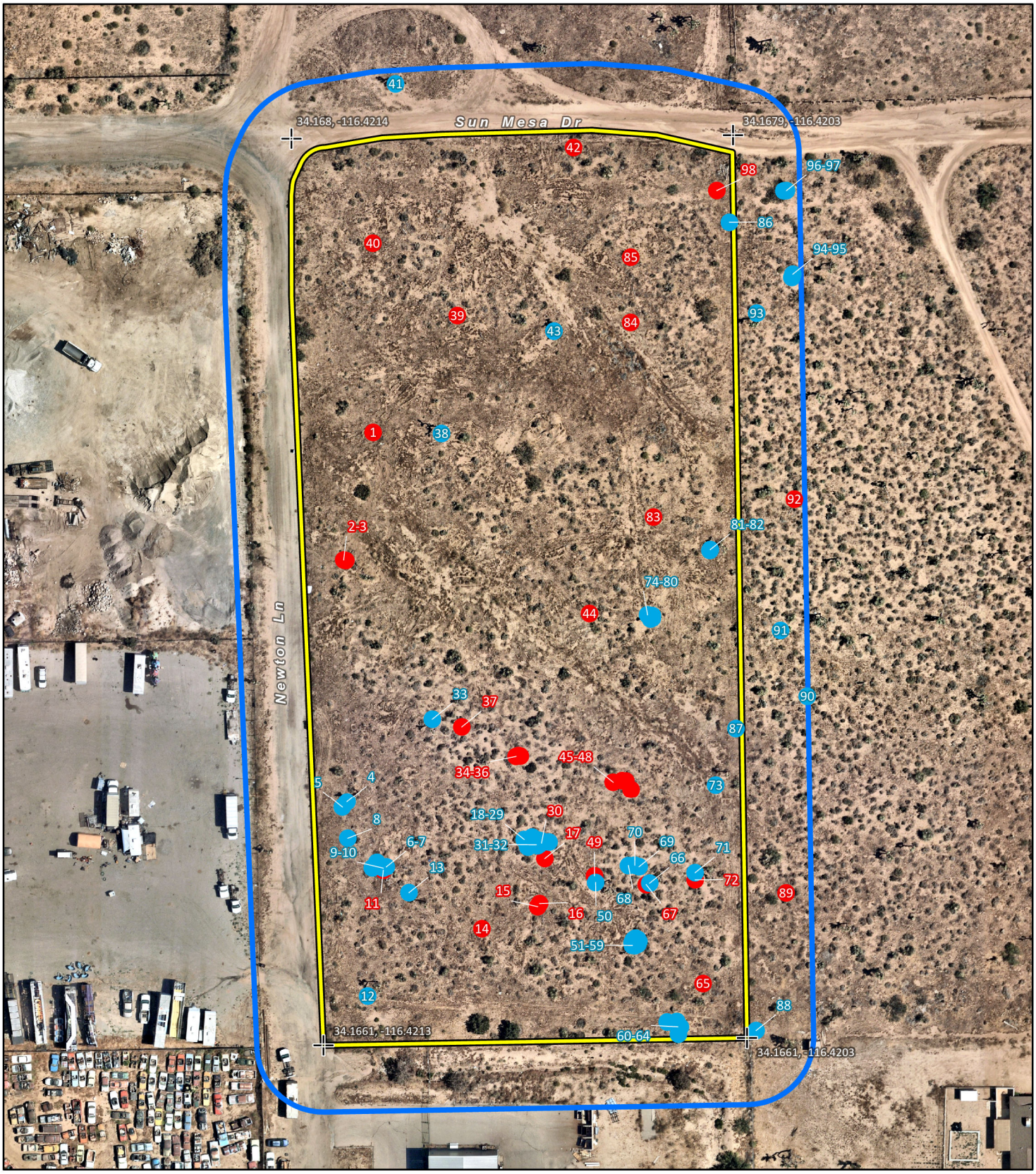
Meters

SOURCE: Nearmap Aerial Imagery (June 12, 2023)

Sun Mesa (Billings) Mini Storage Project

Vegetation, Land Use, and Photo Locations

I:\2023\20231230\GIS\Pro\Sun Mesa Mini Storage Project\Sun Mesa Mini Storage Project.aprx (8/7/2024)



LSA

Project Area

Study Area

Joshua Trees

Alive

Dead

0 14 28

Meters

FIGURE 4

Sun Mesa (Billings) Mini Storage Project

Joshua Tree Census

SOURCE: Nearmap Aerial Imagery (June 12, 2023)

I:\2023\20231230\GIS\Pro\Sun Mesa Mini Storage Project\Sun Mesa Mini Storage Project.aprx (8/6/2024)

APPENDIX B

VASCULAR PLANT SPECIES OBSERVED

The following vascular plant species were observed within the project site by LSA biologists on May 7, 2024.

* Introduced species not native to California

CONIFERS	
Cupressaceace	**Cypress family**
Juniperus californica	California juniper
GNETOPHYTES	
Ephedraceae	**Ephedra family**
Ephedra nevadensis	Nevada jointfir
EUDICOT FLOWERING PLANTS	
Asteraceae	**Sunflower family**
Acamptopappus sphaerocephalus	Rayless goldenhead
Adenophyllum cooperi	Adenophyllum
Ambrosia dumosa	White bur-sage
Ambrosia salsola	Burrobrush
Baileya multiradiata	Desert marigold
Ericameria cooperi	Cooper's goldenbush
Stephanomeria exigua	Small wreath-plant
Boraginaceae	**Borage family**
Amsinckia tessellata	Bristly fiddleneck
Brassicaceae	**Mustard family**
*Brassica tournefortii**	Sahara mustard
*Hirschfeldia incana**	Shortpod mustard
*Sisymbrium altissimum**	Tall tumblemustard
*Sisymbrium irio**	London rocket
Cactaceae	**Cactus family**
Cylindropuntia echinocarpa	Silver cholla
Cylindropuntia ramosissima	Diamond cholla
Echinocereus engelmannii	Hedgehog cactus
Chenopodiaceae	**Saltbush family**
Atriplex canescens	Fourwing saltbush
Euphorbiaceae	**Spurge family**
Euphorbia albomarginata	Rattlesnake weed

Fabaceae	**Pea family**
Senegalia greggii	Catclaw
Senna armata	Spiny senna
Geraniaceae	**Geranium family**
*Erodium cicutarium**	Redstem stork's bill
Lamiaceae	**Mint family**
Salvia columbariae	Chia
Scutellaria mexicana	Bladder sage
Malvaceae	**Mallow family**
Sphaeralcea ambigua	Desert mallow
Nyctaginaceae	**Four-o'clock family**
Mirabilis laevis	Wishbone bush
Polygonaceae	**Buckwheat family**
Eriogonum fasciculatum	California buckwheat
Eriogonum maculatum	Buckwheat
Solanaceae	**Nightshade family**
Lycium andersonii	Water jacket
Lycium cooperi	Peach thorn
Zygophyllaceace	**Caltrop family**
Larrea tridentata	Creosote bush
MONOCOTS FLOWERING PLANTS	
Agavaceae	**Agave family**
Yucca brevifolia	Western Joshua tree
Yucca schidigera	Mojave yucca
Poaceae	**Grass family**
*Bromus rubens**	Red brome
Schismus sp.*	Mediterranean grass

Taxonomy and scientific nomenclature generally conform to Baldwin, B.G., D.H. Goldman et al., eds. (2012; *The Jepson Manual: Vascular Plants of California,* 2nd edition; University of California Press, Berkeley and Los Angeles, California).

Common names for each taxa generally conform to Roberts, F.M., Jr. (2008; *The Vascular Plants of Orange County, California: An Annotated Checklist*; F.M. Roberts Publications, San Luis Rey, California) except where Abrams, L. (1923, 1944, and 1951; *Illustrated Flora of the Pacific States: Washington, Oregon, and California*, vols. I–III; Stanford University Press, Stanford, California) and Abrams, L. and Ferris, R.S. (1960; *Illustrated Flora of the Pacific States: Washington, Oregon, and California*, vol. IV; Stanford University Press, Stanford, California) were used, particularly when species-specific common names were not identified in Roberts, F.M., Jr. (2008).

APPENDIX C

ANIMAL SPECIES DETECTED

This is a list of the bony fishes, amphibians, reptiles, birds, and mammals noted in the study area by LSA biologists. Presence may be noted if a species is seen or heard, or identified by the presence of tracks, scat, or other signs. Please note that most species are listed in phylogenetic order of relation.

* Species not native to the project site

BIRDS	
Odontophoridae	**New World Quail**
Callipepla californica	California quail
Columbidae	**Pigeons and Doves**
Zenaida macroura	mourning dove
Cathartidae	**American Vultures**
Cathartes aura	turkey vulture
Laniidae	**Shrikes**
Lanius ludovicianus	loggerhead shrike
Corvidae	**Crows and Ravens**
Corvus corax	common raven
Passeridae	**Old World Sparrows**
*Passer domesticus**	house sparrow
Fringillidae	**Finches**
Haemorhous mexicanus	house finch
REPTILES	
Teiidae	**Whiptails**
Aspidoscelis	San Diego tiger whiptail
MAMMALS	
Leporidae	**Rabbits and Hares**
Sylvilagus audubonii	desert cottontail

APPENDIX D

REPRESENTATIVE SITE PHOTOGRAPHS

Photo 1: View looking south at Joshua tree woodland from the northwest corner of the project site.

Photo 2: View looking south at Joshua tree woodland from the northeast corner of the project site.

Photo 3: View looking west at Joshua tree woodland from the southeast corner of the project site.

Photo 4: View looking north at Joshua tree woodland from the southwest corner of the project site.

Photo 1: View looking south at Joshua tree woodland from the northwest corner of the project site.

APPENDIX E

JOSHUA TREE REPORT

CARLSBAD
CLOVIS
IRVINE
LOS ANGELES
PALM SPRINGS
POINT RICHMOND
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

September 26, 2025

Daniel R. Patneaude
DRP Enterprises, LLC
P.O. Box 4428
Palm Springs, CA 92263

Subject: Western Joshua Tree Census for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California (LSA Project No. 20252490)

Dear Mr. Patneaude:

This letter report documents the results of a census of western Joshua trees (*Yucca brevifolia var. brevifolia*) conducted at the request of DRP Enterprises, LLC, for the Sun Mesa (Billings) Mini Storage project (project) on Assessor's Parcel Numbers 0597-111-67-0000. The 4.34-acre site is on the southwest corner of Newton Lane and Sun Mesa Road, north of Buena Vista Drive in Yucca Valley, San Bernardino County, California. Figure 1 (all figures provided in Attachment A) provides project location.

The Joshua tree census survey was conducted to comply with the permitting requirements of the Western Joshua Tree Conservation Act and California Department of Fish and Wildlife guidelines. This project is in the reduced fee area, as described in Fish and Game Code section 1927.3.

METHODS

The Western Joshua tree census was conducted on November 1, 2023, from 6:30 a.m. to 3:15 p.m. by LSA arborist Stan Spencer, senior biologist Christina Van Oosten and assistant biologist Eva Newby. Weather conditions during the census were clear, with winds of 0-2 miles per hour (mph) and temperatures from 66-78 Degrees Fahrenheit (°F).

The study area for the census includes the 4.34-acre project site plus a 15-meter (49-foot) buffer area around the site (Figure 2). They surveyed the study area on foot by walking 30-foot transects. The transect spacing provided for complete visual coverage of Joshua trees of all size classes on the site. As access was not provided to the buffer area, Joshua trees were surveyed from the edge of the project site (Assessor's Parcel Numbers 0597-111-67-0000). Each living or dead Joshua tree in the study area was assigned a unique identification number, tagged, photographed, and mapped using Global Positioning System (GPS) technology (datum WGS 84). Each Joshua tree stem or trunk arising from the ground was considered an individual tree. For each Joshua tree, the arborist recorded size class, maturity, and flowering/fruiting status. The collected information for each Joshua tree is provided in Table A (Attachment B). Figure 2 shows Joshua tree locations. Photographs of the Joshua trees are provided in Figure 3.

STAFF BACKGROUND

Dr. Spencer has a Ph.D. in botany from Claremont Graduate University (1997) and is an International Society of Arboriculture Certified Arborist (WE-9358A). He has conducted arborist studies throughout Southern California since 2003, including Joshua tree inventories in Los Angeles and San

Bernardino counties as well as Joshua tree relocation monitoring. Dr. Spencer is knowledgeable of Joshua tree ecology and identification and experienced in inventorying and assessing Joshua trees for general health and suitability for transplanting. Dr. Spencer can be contacted at 951-232-4124 or stan.spencer@lsa.net. Ms. Van Oosten has a B.S. in Zoology from California State Polytechnic University, Pomona (2008) and is a desert ecologist with more than 10 years' experience in the Southwest. She is knowledgeable of Joshua tree ecology and identification and experienced in inventorying and assessing Joshua trees for general health. Ms. Van Oosten is under the tutelage of Dr. Spencer to become an arborist herself and has conducted Joshua tree inventories in Kern and San Bernardino counties.

RESULTS

As shown in Table A, Joshua Tree Census Data, 98 Joshua trees were found in the study area: 87 on the project site and 11 in the buffer area. Fifty-eight of the 87 within the project site are alive, with 4 greater than 5 meters (16.4 feet), 27 are between 1 meter (3.8 feet) to less than 5 meters (16.4 feet), and the remaining 27 are less than 1 meter (3.8 feet) in height.

The 11 Joshua trees in the buffer area are spread through the eastern side of the project. Eight of the 11 are alive, with 1 greater than 5 meters (16.4 feet), 5 are between 1 meter (3.8 feet) to less than 5 meters (16.4 feet), and 2 are less than 1 meter (3.8 feet) in height. No Joshua tree seedlings were found in the study area or the buffer. No flowering or fruiting was observed for the current year.

If you have any questions about this Joshua tree census, please contact me at (626) 215-0329 or christina.vanoosten@lsa.net.

Sincerely,

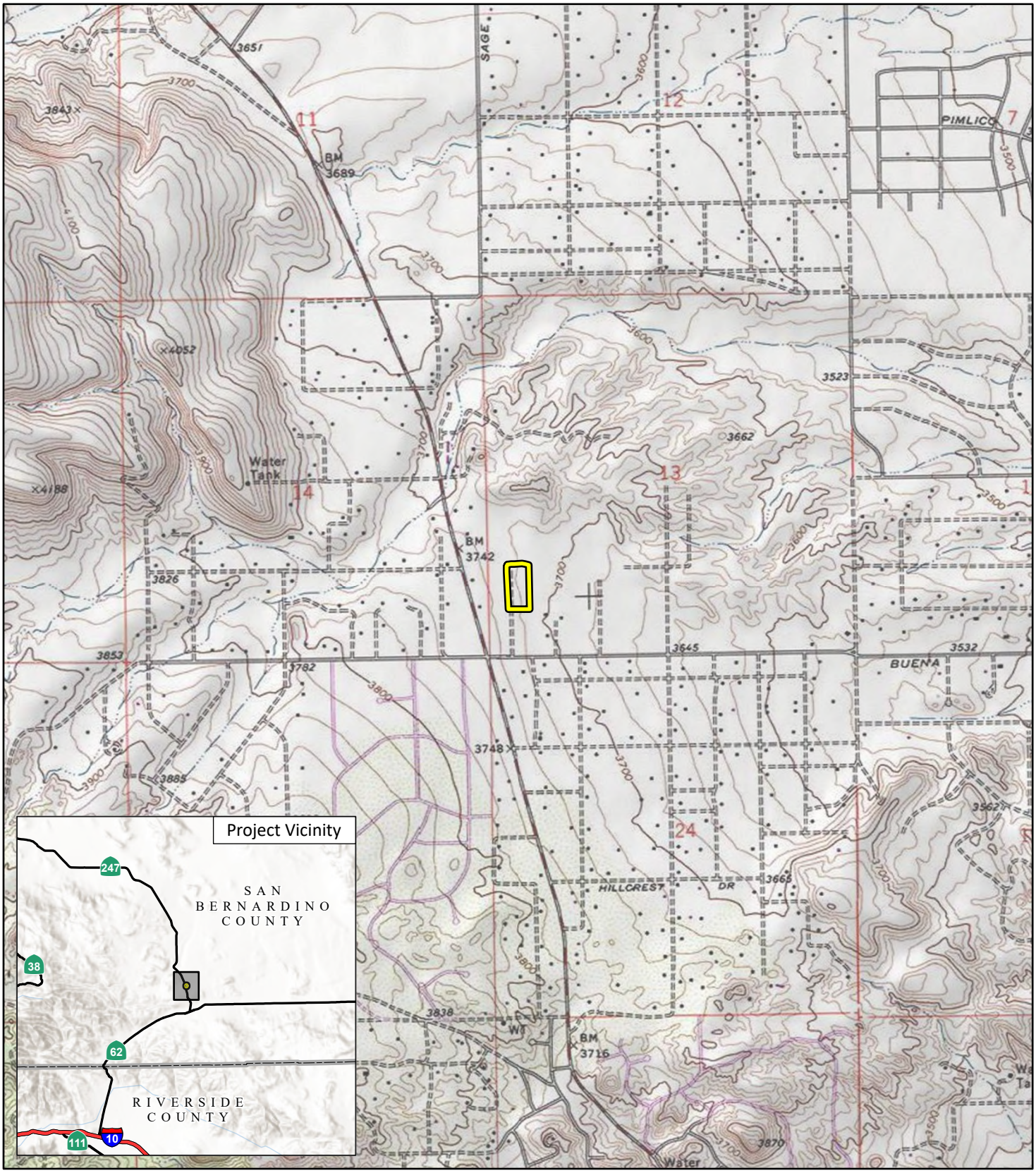
LSA Associates, Inc.

Christina Van Oosten
Senior Biologist

Attachments: A: Figure 1—Project Location
Figure 2—Joshua Tree Census
Figure 3—Representative Tree Photographs
B: Table A

ATTACHMENT A

FIGURES



LSA

Project Area

FIGURE 1

N

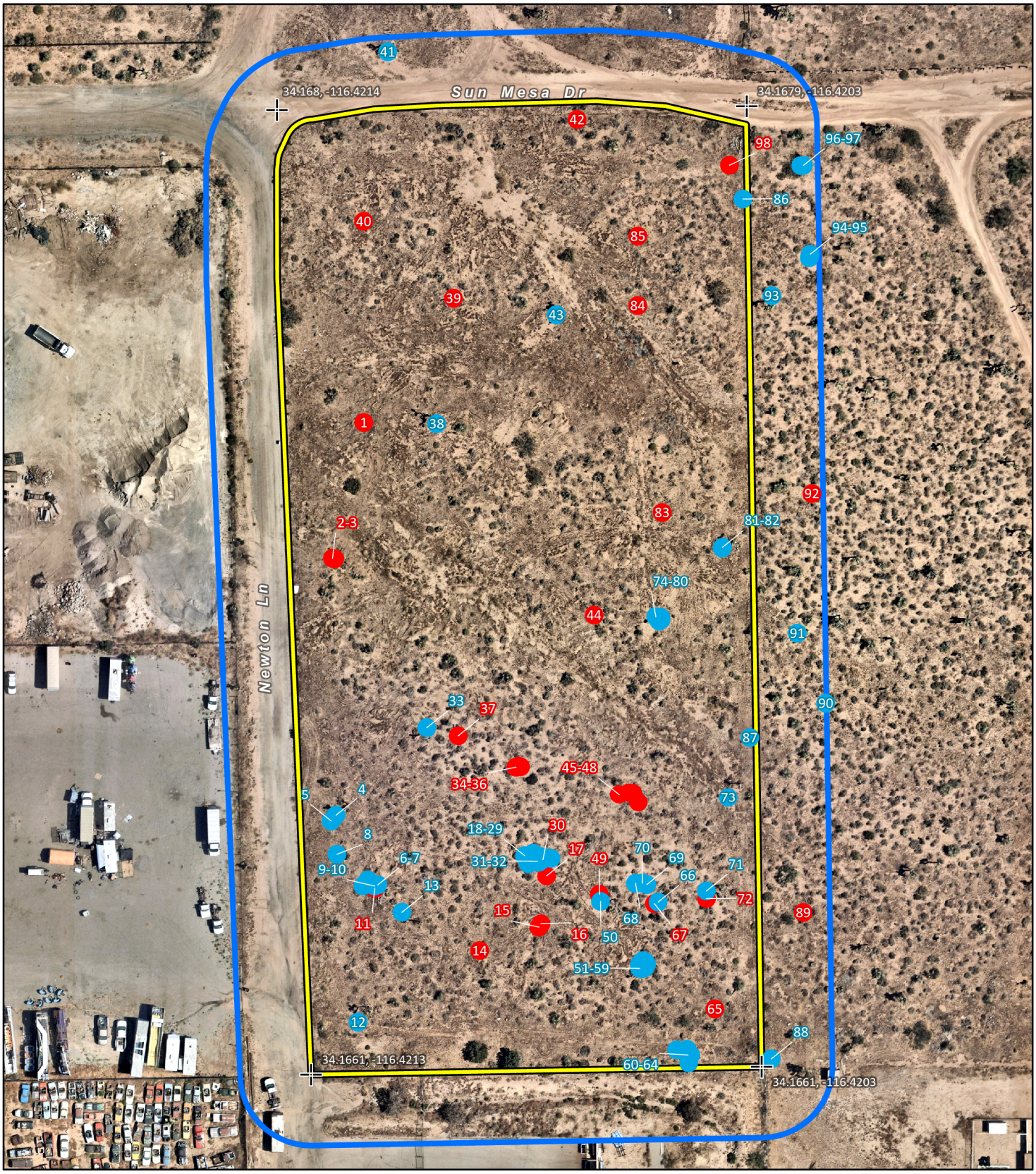
0 1000 2000
FEET

Sun Mesa (Billings) Mini Storage Project

Project Location

SOURCE: USGS 7.5' Quad - *Yucca Valley North (1989)*, CA

J:\20231230\GIS\Pro\Sun Mesa Mini Storage Project\Sun Mesa Mini Storage Project.aprx (11/16/2023)



LSA

Project Area

Study Area

Joshua Trees

Alive

Dead

0 14 28

Meters

FIGURE 2

Sun Mesa (Billings) Mini Storage Project

Joshua Tree Census

SOURCE: Nearmap Aerial Imagery (June 12, 2023)

J:\20231230\GIS\Pro\Sun Mesa Mini Storage Project\Sun Mesa Mini Storage Project.aprx (11/14/2023)

Photo 1: Tree 1

Photo 2: Tree 2

Photo 3: Tree 3

Photo 4: Tree 4

Photo 5: Tree 5

Photo 6: Tree 6

Photo 7: Tree 7

Photo 8: Tree 8

Photo 9: Tree 9

Photo 10: Tree 10

Photo 11: Tree 11

Photo 12: Tree 12

LSA

Sun Mesa (Billings) Mini Storage
Representative Tree Photographs

I:\20231230\G\Tree_Photos.cdr (11/14/2023)

Photo 13: Tree 13

Photo 14: Tree 14

Photo 15: Tree 15

Photo 16: Tree 16

Photo 17: Tree 17

Photo 18: Tree 18

Photo 19: Tree 19

Photo 20: Tree 20

Photo 21: Tree 21

Photo 22: Tree 22

Photo 23: Tree 23

Photo 24: Tree 24

LSA

FIGURE 3

Sun Mesa (Billings) Mini Storage
Representative Tree Photographs

Photo 25: Tree 25

Photo 26: Tree 26

Photo 27: Tree 27

Photo 28: Tree 28

Photo 29: Tree 29

Photo 30: Tree 30

Photo 31: Tree 31

Photo 32: Tree 32

Photo 33: Tree 33

Photo 34: Tree 34

Photo 35: Tree 35

Photo 36: Tree 36

LSA

FIGURE 3

Sun Mesa (Billings) Mini Storage
Representative Tree Photographs

I:\20231230\G\Tree_Photos.cdr (11/14/2023)

Photo 37: Tree 37

Photo 38: Tree 38

Photo 39: Tree 29

Photo 40: Tree 40

Photo 41: Tree 41

Photo 42: Tree 42

Photo 43: Tree 43

Photo 44: Tree 44

Photo 45: Tree 45

Photo 46: Tree 46

Photo 47: Tree 47

Photo 48: Tree 48

LSA

Sun Mesa (Billings) Mini Storage
Representative Tree Photographs

I:\20231230\G\Tree_Photos.cdr (11/14/2023)

Photo 49: Tree 49

Photo 50: Tree 50

Photo 51: Tree 51

Photo 52: Tree 52

Photo 53: Tree 53

Photo 54: Tree 54

Photo 55: Tree 55

Photo 56: Tree 56

Photo 57: Tree 57

Photo 58: Tree 58

Photo 59: Tree 59

Photo 60: Tree 60

LSA

FIGURE 3

Sun Mesa (Billings) Mini Storage
Representative Tree Photographs

I:\20231230\G\Tree_Photos.cdr (11/14/2023)

Photo 61: Tree 61

Photo 62: Tree 62

Photo 63: Tree 63

Photo 64: Tree 64

Photo 65: Tree 65

Photo 66: Tree 66

Photo 67: Tree 67

Photo 68: Tree 68

Photo 69: Tree 69

Photo 70: Tree 70

Photo 71: Tree 71

Photo 72: Tree 72

LSA

Sun Mesa (Billings) Mini Storage
Representative Tree Photographs

I:\20231230\G\Tree_Photos.cdr (11/14/2023)

Photo 73: Tree 73

Photo 74: Tree 74

Photo 75: Tree 75

Photo 76: Tree 76

Photo 77: Tree 77

Photo 78: Tree 78

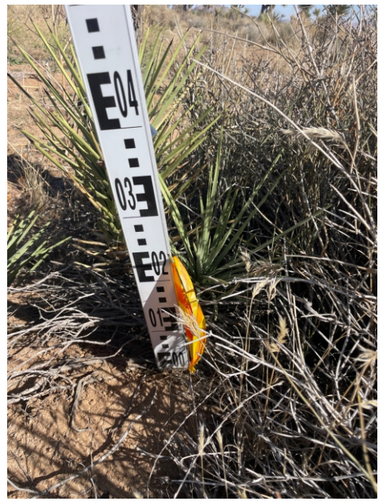


Photo 79: Tree 79

Photo 80: Tree 80

Photo 81: Tree 81

Photo 82: Tree 82

Photo 83: Tree 83

Photo 84: Tree 84

Sun Mesa (Billings) Mini Storage
Representative Tree Photographs

Photo 85: Tree 85

Photo 86: Tree 86

Photo 87: Tree 87

Photo 88: Tree 88 in buffer. No property access.

Photo 89: Tree 89 in buffer. No property access.

Photo 90: Tree 90 in buffer. No property access.

Photo 91: Tree 91 in buffer. No property access.

Photo 92: Tree 92 in buffer. No property access.

Photo 69: Tree 69 in buffer. No property access.

Photo 70: Tree 70 in buffer. No property access.

Photo 71: Tree 71 in buffer. No property access.

Photo 96: Tree 96 in buffer. No property access.

LSA

FIGURE 3

Sun Mesa (Billings) Mini Storage
Representative Tree Photographs

I:\20231230\G\Tree_Photos.cdr (11/14/2023)

Photo 97: Tree 97 in buffer. No property access.

Photo 98: Tree 98 in buffer. No property access.

LSA

FIGURE 3

Sun Mesa (Billings) Mini Storage
Representative Tree Photographs

I:\20231230\G\Tree_Photos.cdr (11/14/2023)

ATTACHMENT B

TABLE A

Table A: Joshua Tree Census Data

Tree Number	Latitude (WGS 84)	Longitude (WGS 84)	Size Class[1]	Live or Dead?	Mature (Branched)?	Flowering or Fruiting Stage?	Project Impact to Tree (Removal, Trim, Relocation, Other, or None)	Project Activity Within 15 Meters?
1	34.167359	-116.421207	B	Dead	Yes	None	Removal	Yes
2	34.167102	-116.421284	B	Dead	Unknown	None	Removal	Yes
3	34.167101	-116.421278	B	Dead	Yes	None	Removal	Yes
4	34.166611	-116.421285	C	Live	Yes	None	Removal	Yes
5	34.1666	-116.421296	B	Live	Yes	None	Removal	Yes
6	34.166477	-116.421191	B	Live	Yes	None	Removal	Yes
7	34.166487	-116.421214	B	Live	Yes	None	Removal	Yes
8	34.166536	-116.421284	A	Live	No	None	Removal	Yes
9	34.166475	-116.421199	A	Live	No	None	Removal	Yes
10	34.166476	-116.421226	A	Live	No	None	Removal	Yes
11	34.16647	-116.421199	B	Dead	Yes	None	Removal	Yes
12	34.166216	-116.421242	C	Live	Yes	None	Removal	Yes
13	34.166424	-116.421137	B	Live	Yes	None	Removal	Yes
14	34.166349	-116.42096	B	Dead	Yes	None	Removal	Yes
15	34.166392	-116.420823	B	Dead	Yes	None	Removal	Yes
16	34.166398	-116.420819	B	Dead	Unknown	None	Removal	Yes
17	34.166489	-116.420804	B	Dead	No	None	Removal	Yes
18	34.166528	-116.420854	B	Live	Yes	None	Removal	Yes
19	34.166525	-116.420811	B	Live	No	None	Removal	Yes
20	34.166529	-116.420833	B	Live	Unknown	None	Removal	Yes
21	34.166514	-116.420846	B	Live	No	None	Removal	Yes
22	34.166523	-116.42084	B	Live	No	None	Removal	Yes
23	34.166526	-116.420819	B	Live	No	None	Removal	Yes
24	34.166522	-116.420793	A	Live	No	None	Removal	Yes
25	34.166523	-116.420825	A	Live	No	None	Removal	Yes
26	34.166513	-116.420845	A	Live	No	None	Removal	Yes
27	34.166517	-116.420837	A	Live	No	None	Removal	Yes
28	34.166533	-116.420834	A	Live	Unknown	None	Removal	Yes
29	34.166518	-116.420816	A	Live	Yes	None	Removal	Yes
30	34.16652	-116.420812	A	Dead	No	None	Removal	Yes

Table A: Joshua Tree Census Data

Tree Number	Latitude (WGS 84)	Longitude (WGS 84)	Size Class[1]	Live or Dead?	Mature (Branched)?	Flowering or Fruiting Stage?	Project Impact to Tree (Removal, Trim, Relocation, Other, or None)	Project Activity Within 15 Meters?
31	34.166517	-116.420825	A	Live	No	None	Removal	Yes
32	34.166515	-116.420821	A	Live	No	None	Removal	Yes
33	34.166776	-116.421073	B	Live	Yes	None	Removal	Yes
34	34.166698	-116.42087	B	Dead	Yes	None	Removal	Yes
35	34.166699	-116.42086	B	Dead	Yes	None	Removal	Yes
36	34.1667	-116.420864	B	Dead	No	None	Removal	Yes
37	Yes	-116.421002	B	Dead	Unknown	None	Removal	Yes
38	Yes	-116.42104	C	Live	Yes	None	Removal	Yes
39	Yes	-116.420997	B	Dead	Yes	None	Removal	Yes
40	Yes	-116.42120	B	Dead	Yes	None	Removal	Yes
41	Yes	-116.421139	C	Live	Yes	None	Other (in buffer)	Yes
42	Yes	-116.420707	B	Dead	Yes	None	Removal	Yes
43	Yes	-116.420761	B	Live	Yes	None	Removal	Yes
44	Yes	-116.420685	B	Dead	Yes	None	Removal	Yes
45	Yes	-116.420634	B	Dead	Yes	None	Removal	Yes
46	Yes	-116.420603	B	Dead	Unknown	None	Removal	Yes
47	Yes	-116.420612	B	Dead	No	None	Removal	Yes
48	Yes	-116.420591	B	Dead	Unknown	None	Removal	Yes
49	Yes	-116.420684	B	Dead	Yes	None	Removal	Yes
50	Yes	-116.420681	C	Live	Yes	None	Removal	Yes
51	Yes	-116.420594	B	Live	Yes	None	Removal	Yes
52	Yes	-116.420586	B	Live	Yes	None	Removal	Yes
53	Yes	-116.420578	A	Live	Unknown	None	Removal	Yes
54	Yes	-116.420588	A	Live	No	None	Removal	Yes
55	Yes	-116.42058	A	Live	Unknown	None	Removal	Yes
56	Yes	-116.420594	A	Live	No	None	Removal	Yes
57	Yes	-116.420591	A	Live	Unknown	None	Removal	Yes
58	Yes	-116.42058	A	Live	No	None	Removal	Yes
59	Yes	-116.420587	A	Live	Unknown	None	Removal	Yes
60	Yes	-116.420486	B	Live	Yes	None	Removal	Yes

Table A: Joshua Tree Census Data

Tree Number	Latitude (WGS 84)	Longitude (WGS 84)	Size Class[1]	Live or Dead?	Mature (Branched)?	Flowering or Fruiting Stage?	Project Impact to Tree (Removal, Trim, Relocation, Other, or None)	Project Activity Within 15 Meters?
61	Yes	-116.420512	A	Live	No	None	Removal	Yes
62	Yes	-116.420485	A	Live	Unknown	None	Removal	Yes
63	Yes	-116.42048	B	Live	Yes	None	Removal	Yes
64	Yes	-116.420488	A	Live	No	None	Removal	Yes
65	Yes	-116.420423	B	Dead	Unknown	None	Removal	Yes
66	Yes	-116.420549	B	Live	Yes	None	Removal	Yes
67	Yes	-116.420558	B	Dead	Unknown	None	Removal	Yes
68	Yes	-116.42060	B	Live	Yes	None	Removal	Yes
69	Yes	-116.420574	B	Live	Unknown	None	Removal	Yes
70	Yes	-116.420585	A	Live	No	None	Removal	Yes
71	Yes	-116.420438	B	Live	Yes	None	Removal	Yes
72	Yes	-116.420438	B	Dead	No	None	Removal	Yes
73	Yes	-116.420384	B	Live	Yes	None	Removal	Yes
74	Yes	-116.420544	B	Live	Yes	None	Removal	Yes
75	Yes	-116.420537	B	Live	No	None	Removal	Yes
76	Yes	-116.420532	A	Live	Unknown	None	Removal	Yes
77	Yes	-116.420532	A	Live	No	None	Removal	Yes
78	Yes	-116.420536	A	Live	No	None	Removal	Yes
79	Yes	-116.420538	A	Live	Unknown	None	Removal	Yes
80	Yes	-116.420535	A	Live	Unknown	None	Removal	Yes
81	Yes	-116.420388	B	Live	Yes	None	Removal	Yes
82	Yes	-116.420389	B	Live	Unknown	None	Removal	Yes
83	Yes	-116.420526	B	Dead	Unknown	None	Removal	Yes
84	Yes	-116.420574	B	Dead	Unknown	None	Removal	Yes
85	Yes	-116.420571	B	Dead	Yes	None	Removal	Yes
86	Yes	-116.420329	B	Live	Yes	None	Removal	Yes
87	Yes	-116.420332	B	Live	Yes	None	Removal	Yes
88	Yes	-116.420295	B	Live	Unknown	None	Other (in buffer)	Yes
89	Yes	-116.420216	B	Dead	Unknown	None	Other (in buffer)	Yes
90	Yes	-116.420157	B	Live	Yes	None	Other (in buffer)	Yes

Table A: Joshua Tree Census Data

Tree Number	Latitude (WGS 84)	Longitude (WGS 84)	Size Class[1]	Live or Dead?	Mature (Branched)?	Flowering or Fruiting Stage?	Project Impact to Tree (Removal, Trim, Relocation, Other, or None)	Project Activity Within 15 Meters?
91	Yes	-116.42022	B	Live	Yes	None	Other (in buffer)	Yes
92	Yes	-116.420181	B	Dead	Yes	None	Other (in buffer)	Yes
93	Yes	-116.420266	B	Live	Yes	None	Other (in buffer)	Yes
94	Yes	-116.420176	B	Live	Yes	None	Other (in buffer)	Yes
95	Yes	-116.420179	A	Live	No	None	Other (in buffer)	Yes
96	Yes	-116.420189	A	Live	No	None	Other (in buffer)	Yes
97	Yes	-116.420195	B	Live	Yes	None	Other (in buffer)	Yes
98	Yes	-116.420359	B	Dead	Yes	None	Removal	Yes

Source: Compiled by LSA (2023)

[1] A = Height less than 1 meter (3.8 feet) ; B = Height 1 m (3.8 feet) to less than 5 m (16.4 feet); C = Height 5 m (16.4 feet) or more.

APPENDIX F

PLANT REPORT

CARLSBAD
CLOVIS
IRVINE
LOS ANGELES
PALM SPRINGS
POINT RICHMOND
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

September 26, 2025

Daniel R. Patneaude
DRP Enterprises, LLC
P.O. Box 4428
Palm Springs, CA 92263

Subject: Plant Survey for the Sun Mesa (Billings) Mini Storage Project in Yucca Valley, San Bernardino County, California (LSA Project No. 20252490)

Dear Mr. Patneaude:

This letter report documents the findings of a spring plant survey conducted at the request of DRP Enterprises, LLC, for the Sun Mesa (Billings) Mini Storage Project (project) on Assessor's Parcel Number 0597-111-67-0000. The 4.34-acre site is on the southwest corner of Newton Lane and Sun Mesa Road, north of Buena Vista Drive in Yucca Valley, San Bernardino County, California. The elevation of the project site ranges from approximately 3,710 to 3,726 ft above mean sea level (amsl). Figure 1 (provided in Attachment B) shows the project location.

The survey was conducted to document the presence of any special-status species detectable during the time of the survey. Yucca Valley's annual rainfall varies significantly year-to-year but generally receives around 3-6 inches of rain annually. The rainy season occurs from approximately late November to late March. The 2023-2024 season rainfall to date at the time of the survey, based on records at the Yucca Valley Airport, was 7.9 inches.[1] A survey had previously been conducted for Western Joshua tree (*Yucca brevifolia*), a State candidate species.

METHODS

The plant survey was conducted by LSA botanist Stan Spencer, PhD, and LSA biologists Christina Van Oosten and Julia Lung on May 7, 2024, from 9:45 and 11:50 a.m., for a total of 6 person hours of survey effort. The survey was conducted in a manner consistent with California Native Plant Society (CNPS) 2001 guidelines.[2] The entire project site and adjacent right-of-way areas were surveyed by systematically walking along 15-meter (50-foot) wide, parallel line transects. Adjacent habitat in private properties to the south and east of the project site were visually surveyed from the property boundary, as no access was provided to those properties. The survey was floristic in nature, and all species observed on the site, including annual species that were past flower or dessicated, were identified to the degree required to determine rarity status.

[1] Weather Underground. Past weather for Station L22 Airport - KCAYUCCA49, https://www.wunderground.com/dashboard/pws/KCAYUCCA49, accessed 15 September 2025.
[2] California Native Plant Society. *CNPS Botanical Survey Guidelines*. June 2, 2001.

RESULTS AND DISCUSSION

No special-status plant species were observed during the survey except Western Joshua tree. A list of plant species observed in the study area is provided in Table A (Attachment A).

Please contact me at (951) 690-6309 or Christina Van Oosten at (626) 215-0329 if you have any questions regarding the results of this study.

Sincerely,

LSA Associates, Inc.

Stan Spencer
Associate/Botanist

Attachments: A: Table A – Vascular Plant Species Observed
B: Figure 1

ATTACHMENT A

TABLE A: VASCULAR PLANT SPECIES OBSERVED

Table A: Vascular Plant Species Observed

Scientific Name	Common Name
CONIFERS	
Cupressaceace	**Cypress family**
Juniperus californica	California juniper
GNETOPHYTES	
Ephedraceae	**Ephedra family**
Ephedra nevadensis	Nevada jointfir
EUDICOT FLOWERING PLANTS	
Asteraceae	**Sunflower family**
Acamptopappus sphaerocephalus	Rayless goldenhead
Adenophyllum cooperi	Adenophyllum
Ambrosia dumosa	White bur-sage
Ambrosia salsola	Burrobrush
Baileya multiradiata	Desert marigold
Ericameria cooperi	Cooper's goldenbush
Stephanomeria exigua	Small wreath-plant
Boraginaceae	**Borage family**
Amsinckia tessellata	Bristly fiddleneck
Brassicaceae	**Mustard family**
*Brassica tournefortii**	Sahara mustard
*Hirschfeldia incana**	Shortpod mustard
*Sisymbrium altissimum**	Tall tumblemustard
*Sisymbrium irio**	London rocket
Cactaceae	**Cactus family**
Cylindropuntia echinocarpa	Silver cholla
Cylindropuntia ramosissima	Diamond cholla
Echinocereus engelmannii	Hedgehog cactus
Chenopodiaceae	**Saltbush family**
Atriplex canescens	Fourwing saltbush
Euphorbiaceae	**Spurge family**
Euphorbia albomarginata	Rattlesnake weed
Fabaceae	**Pea family**
Senegalia greggii	Catclaw
Senna armata	Spiny senna
Geraniaceae	**Geranium family**
*Erodium cicutarium**	Redstem stork's bill
Lamiaceae	**Mint family**
Salvia columbariae	Chia
Scutellaria mexicana	Bladder sage
Malvaceae	**Mallow family**
Sphaeralcea ambigua	Desert mallow
Nyctaginaceae	**Four-o'clock family**
Mirabilis laevis	Wishbone bush
Polygonaceae	**Buckwheat family**
Eriogonum fasciculatum	California buckwheat
Eriogonum maculatum	Buckwheat
Solanaceae	**Nightshade family**
Lycium andersonii	Water jacket

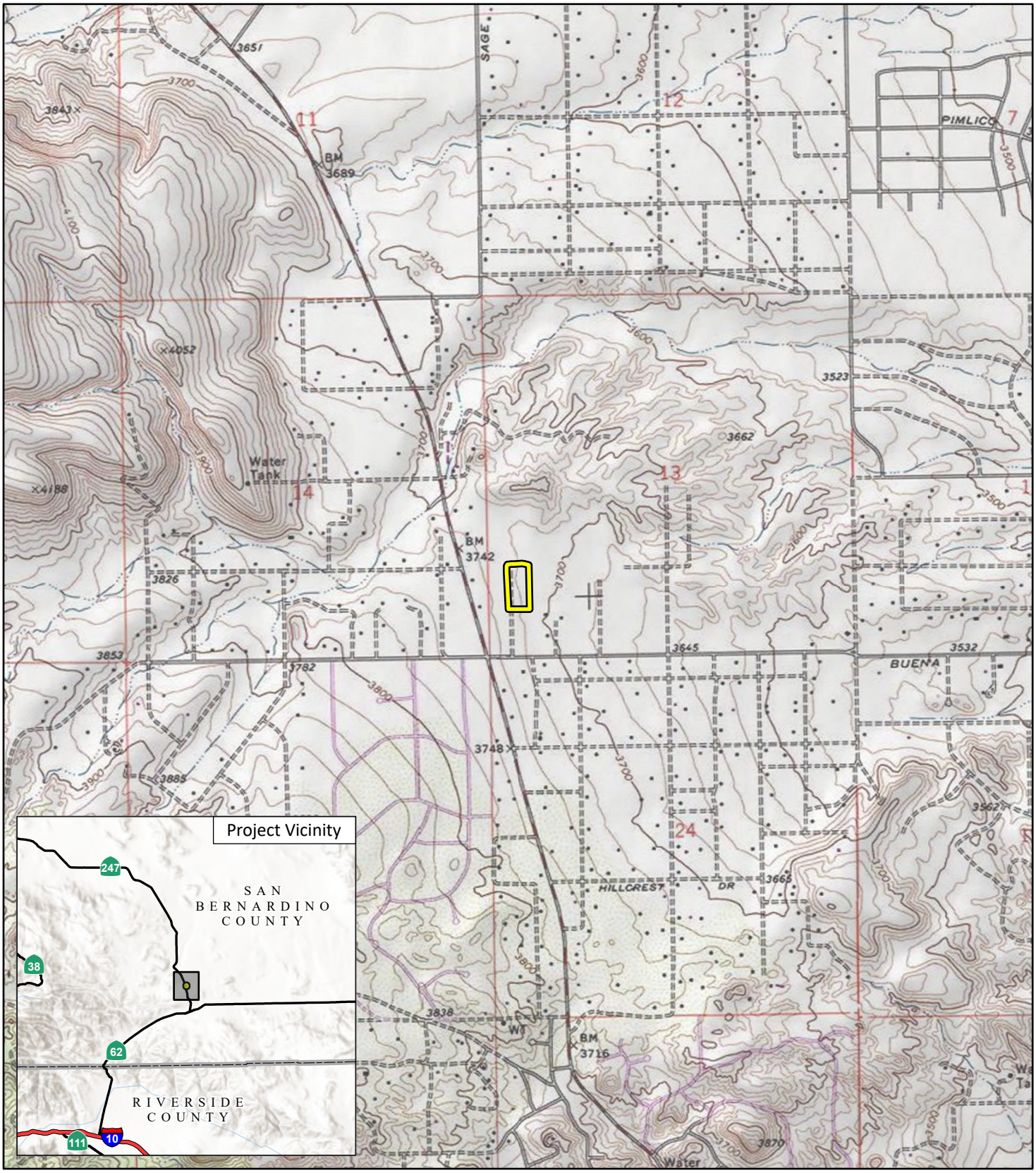
Table A: Vascular Plant Species Observed

Scientific Name	Common Name
Lycium cooperi	Peach thorn
Zygophyllaceae	**Caltrop family**
Larrea tridentata	Creosote bush
MONOCOTS FLOWERING PLANTS	
Agavaceae	**Agave family**
Yucca brevifolia	Joshua tree
Yucca schidigera	Mojave yucca

* non-native species

ATTACHMENT B

FIGURE 1



LSA

Project Area

FIGURE 1

N

0 1000 2000
FEET

Sun Mesa (Billings) Mini Storage Project

Project Location

SOURCE: USGS 7.5' Quad - *Yucca Valley North (1989)*, CA

J:\20231230\GIS\Pro\Sun Mesa Mini Storage Project\Sun Mesa Mini Storage Project.aprx (11/16/2023)