APPENDIX B – BIOLOGICAL RESOURCES TECHNICAL REPORT

Biological Resources Technical Report

Regency Centers

City of Redlands, California

FINAL REPORT

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INTRODUCTION

The following biological resources technical report describes a detailed assessment of potential sensitive natural resources located within and/or immediately adjacent to the "Regency Centers" Project Site. The report has been prepared to support compliance with the California Environmental Quality Act (CEQA) documentation including the preparation of an Initial Study (IS), Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND) and environmental review process conducted by the City of Redlands. As discussed below, the assessment included a thorough literature review, site reconnaissance characterizing existing conditions (including floral, faunal and dominant vegetation communities), impact analysis, and applicable standards and regulations to ensure impacts remain at a level below significance.

PROJECT SITE LOCATION

The 8.14-acre Project Site (Project Site) is located within the City of Redlands, San Bernardino County, California, Assessor Parcel Numbers (APNs) 0167-171-11, -016 and right-of-way, as shown in Figure 1, *Regional Location Map* and Figure 2, *Project Site Map.* Specifically, the Project Site extends east of Tennessee Street and north of West Lugonia Street.

PROJECT SITE DESCRIPTION

The proposed action within the Project Site would consist of commercial development including but not limited to a market, shops, restaurant and parking.

METHODOLOGY

The following section details the methods implemented prior to and during the reconnaissance survey conducted throughout the Project Site.

LITERATURE REVIEW

Existing biological resource conditions within and adjacent to the Project Site were initially investigated through review of pertinent scientific literature and industry standard databases including but not limited to the following:

- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants in California (CNPS 2025).
- United States Fish and Wildlife Service (USFWS) Species Occurrence Database (USFWS 2025a).
- The Information for Planning and Consultation (IPaC) database from the USFWS (USFWS 2025b).
- USFWS Critical Habitat Mapper (USFWS 2025c).
- The California Natural Diversity Database (CNDDB) (CDFW 2025a), a California Department of Fish and Wildlife (CDFW) Natural Heritage Division species account database.
- Special Animals (CDFW 2025b).

- State and Federally Listed Endangered and Threatened Animals of California (CDFW 2025c).
- Endangered, Threatened, and Rare Plants of California (CDFW 2025d).
- Special Vascular Plants and Bryophytes List (CDFW 2025e).
- iNaturalist Database. (iNaturalist 2025).
- eBird (eBird 2025).
- City of Redlands Municipal Codes (City of Redlands 2025).
- City of Redlands General Plan 2035 (City of Redlands 2017).

FIELD SURVEY

A reconnaissance survey of the Project Site was conducted by Ruben Ramirez of Cadre Environmental on March 3rd, 2025 in order to characterize and identify potential sensitive plant and wildlife habitats, and to establish the accuracy of the data identified in the literature search. Geologic and soil maps were examined to identify local soil types that may support sensitive taxa. Aerial photograph, topographic maps, vegetation and rare plant maps prepared for previous studies in the region were used to determine community types and other physical features that may support sensitive plants/wildlife, uncommon taxa, or rare communities that occur within or adjacent to the. Habitat assessments were conducted for, but not limited to, the following target species/groups.

- Delhi sands flower loving fly – Federally Endangered (FE)
- Crotch's bumble bee – State Candidate Endangered (SCE)
- Coastal California gnatcatcher – Federally Threatened (FT)/State Species of Special Concern (SSC)
- Burrowing owl - SCE
- Least Bell's vireo – FE/State Endangered (SE)
- San Bernardino kangaroo rat – FE/SSC
- Common and sensitive bat species
- Sensitive plants (Refer to Table 2, Sensitive Plant Species Assessment)

Vegetation Communities/Habitat Classification Mapping

Natural community names and hierarchical structure follows the "*Manual of California Vegetation Online*" (CNPS 20025) classification system, which has been refined and augmented where appropriate to better characterize the habitat types observed throughout the Project Site. All plants observed during the survey efforts were either identified in the field or collected and later identified using taxonomic keys. Plant taxonomy follows Jepson Flora Project (eds.) (Jepson eFlora 2025). Scientific names are included only at the first mention of a species; thereafter, common names alone are used.

Wildlife Resources Inventory

All animals identified during the reconnaissance survey by sight, call, tracks, scat, or other characteristic sign were documented. In addition to species actually detected, expected use of the site by other wildlife was derived from the analysis of habitats on the site, combined with known habitat preferences of regionally occurring wildlife species. Vertebrate taxonomy followed in this report is according to the Center for North American

Herpetology (2025) for amphibians and reptiles, the American Ornithological Society (2025) for birds, and American Society of Mammalogists (2025) for mammals. Both common and scientific names are used during the first mention of a species; common names only are used in the remainder of the text.

Regional Connectivity/Wildlife Movement Corridors

The analysis of wildlife movement corridors associated with the Project Site and immediate vicinity is based on information compiled from literature, analysis of the aerial photograph and direct observations made in the field during the reconnaissance site visit.

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

Jurisdictional Resources Assessment

The Project Site was assessed for the potential presence/absence of United States Army Corps of Engineers (USACE), CDFW, and Regional Water Quality Control Board (RWQCB) jurisdictional resources through review of pertinent scientific literature and industry standard databases including but not limited to the following:

- Custom Soil Resources Report for San Bernardino County, California. (Natural Resources Conservation Service (NRCS) U.S. Department of Agriculture (USDA) 2025).
- National Wetlands Mapper (NWI) (USFWS 2025d).
- National Surface Water Information System Database. United States Geological Service (USGS 2025).
- Corps of Engineers Wetlands Delineation Manual, Technical Report (Environmental Laboratory. 1987).
- Regional Supplement to the USACE of Engineers Wetland Delineation Manual: Arid West Region (USACE 2008).
- Final National Ordinary High Water Mark Field Delineation Manual for Rivers and Streams (USACE 2025).

APNs 0167-171-16 and -11 (8.14 acres)

Figure 1 - Regional Location Map

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not to scale

APNs 0167-171-16 and -11 (8.14 acres)

Figure 2 - Project Site Map

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N

1 inch = 80 feet

The following section presents the existing conditions of the Project Site. The Project Site is characterized as disturbed/ruderal with indications of annual disking activities (weed abatement), as shown in Figure 3, *Project Site Vegetation Communities Map*, Figures 4 and 5, *Current Photographs,* and outlined in Table 1, *Project Site Vegetation Community Acreages*. The Project Site is bordered by high traffic roads and commercial development to the west and south. The northern and eastern boundaries are adjacent to similar disturbed/ruderal lands (MIG 2023). The Soil Survey of the San Bernardino County Area has the Project Site mapped as Hanford sandy loam and Tujunga loamy sand substrates, as shown on Figure 6, *Soils Association Map*, and described below.

Hanford sandy loam - Hanford sandy loam is a well-drained soil found on floodplains and alluvial fans, characterized by its coarse-loamy texture. It is typically found at elevations between 150 and 3,500 feet with slopes ranging from 0 to 15 percent.

Tujunga loamy sand - Tujunga loamy sand is a type of soil found on alluvial fans and floodplains, characterized by its deep, somewhat excessively drained nature and formation from granitic alluvium. It typically has a loamy sand texture throughout, with some variations like loam or sandy loam in the upper layers. The soil is known for its moderately rapid permeability and well-drained characteristics.

VEGETATION COMMUNITIES

Disturbed/Ruderal

A total of 8.06-aces of disturbed/ruderal vegetation was documented onsite. This region of the Project Site appears to be annually disked and is dominated by ruderal species and native species common within disturbed habitats. Species documented onsite include wild oat (*Avena fatua*), foxtail barley (*Hordeum murinum*), Mediterranean schismus (*Schismus barbatus*), ripgut brome (*Bromus diandrus*), Russian thistle (*Salsola tragus*), stinknet (*Oncosiphon pilulifer*), black mustard (*Brassica nigra*), horseweed (*Erigeron canadensis*), red-stemmed filaree (*Erodium cicutarium*), prickly lettuce (*Lactuca serriola*), tumbling pigweed (*Amaranthus albus*), telegraph weed (*Heterotheca grandiflora*), annual bursage (*Ambrosia acanthicarpa*), common sow thistle (*Sonchus oleraceus*), common fiddleneck (*Amsinckia menziesii*), western ragweed (*Ambrosia psilostachya*), cheeseweed (*Malva parviflora*), short-pod mustard (*Hirschfeldia incana*), London rocket (*Sisymbrium irio*), and, puncture vine (*Tribulus terrestris*). The Project Site is void of trees.

Developed

A total of 0.08-acre of the developed reach of West Lugonia right-of-way is located within the Project Site.

APNs 0167-171-16 and -11 (8.14 acres)

Figure 3 - Vegetation Communities Map

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N

1 inch = 80 feet

PHOTOGRAPH 1 - Northeast view of Project Site from south-west corner adjacent to Lugonia Street and Tennessee Street intersection.

PHOTOGRAPH 2 - Southeast view of Project Site from north-west corner adjacent to Tennessee Street.

Refer to Figure 2 - Project Site Map for Photographic Key

Figure 4 - Current Photographs
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PHOTOGRAPH 3 - Southwest view of Project Site from north-east corner.

PHOTOGRAPH 4 - Northwest view of Project Site from south-east corner adjacent to Lugonia Street.

Refer to Figure 2 - Project Site Map for Photographic Key

Figure 5 - Current Photographs
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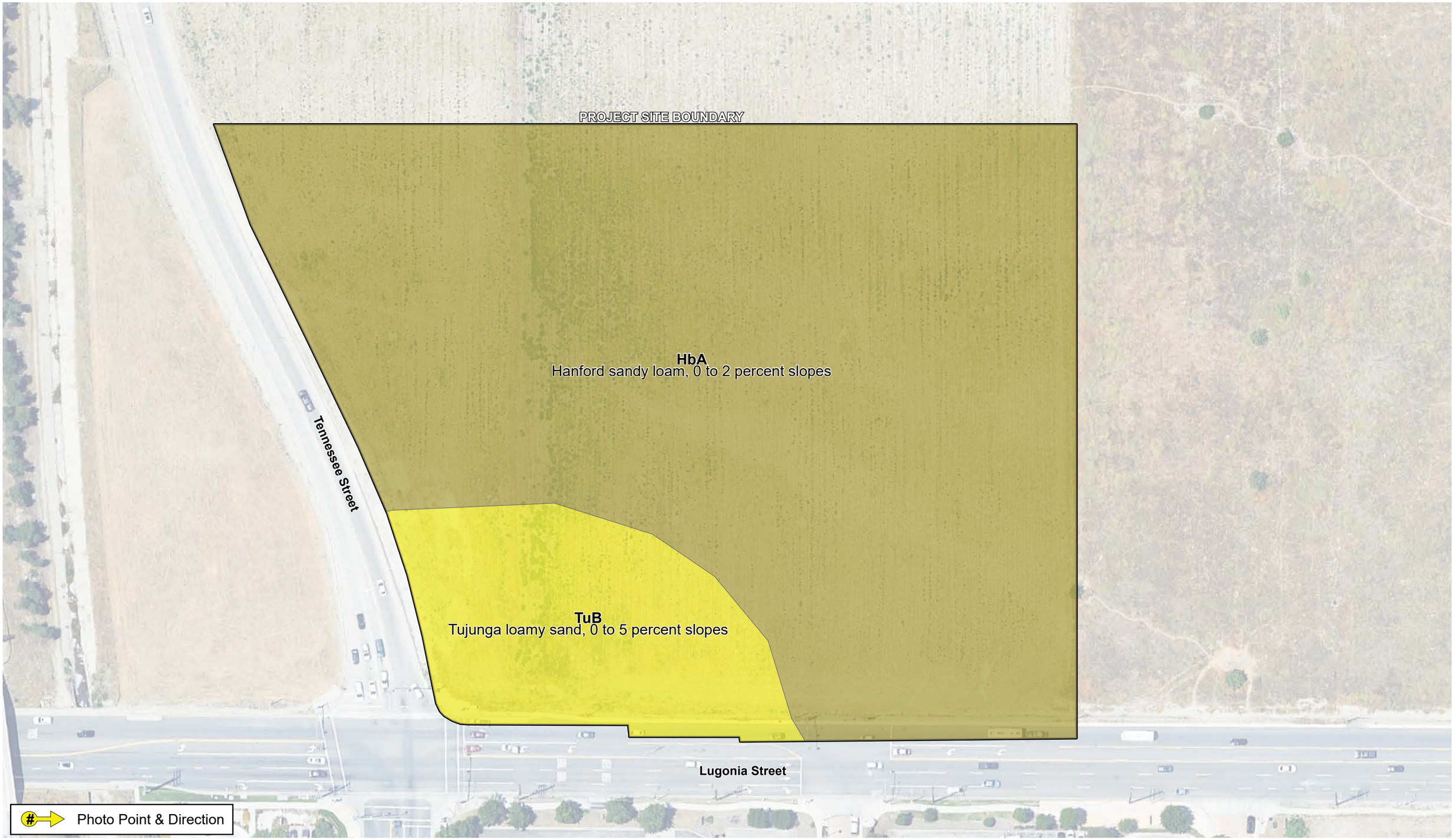

APNs 0167-171-16 and -11 (8.14 acres)

Figure 6 - Soils Association Map

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N

1 inch = 80 feet

Table 1.
Project Site Vegetation Community Acreages

Vegetation Community	Project Site Acres
Disturbed/Ruderal	8.06
Developed	0.08
TOTAL	**8.14**

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GENERAL PLANT & WILDLIFE SPECIES

Dominant and subdominant plant species documented within the Project Site are presented and listed in the previous section.

General wildlife species documented within the Project Site include red-tailed hawk (*Buteo jamaicensis*), rock dove (*Columba livia*), northern mockingbird (*Mimus polyglottos*), mourning dove (*Zenaida macroura*), black phoebe (*Sayornis nigricans*), Say's phoebe (*Sayornis saya*), American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), and California ground squirrel (*Otospermophilus beecheyi*).

JURISDICTIONAL RESOURCES

The Project Site was assessed for the potential presence/absence of USACE, CDFW, and RWQCB jurisdictional resources. No jurisdictional resources regulated by USACE, CDFW, and RWQCB are present within or adjacent to the Project Site.

Impacts to water quality would be less than significant during both construction and operation following preparation and implementation of a Water Quality Management Plan (WQMP), Storm Water Pollution Prevention Plan (SWPPP) and compliance with the City of Redlands Storm Water Program/National Pollutant Discharge Elimination System (NPDES) permit and Area-Wide Urban Storm Water Runoff Management Program Municipal Separate Stormwater Sewer System (MS4s) code provisions.

SENSITIVE BIOLOGICAL RESOURCES

The following discussion describes the plant and wildlife species present, or potentially present within the property boundaries, that have been afforded special recognition by federal, state, or local resource conservation agencies and organizations, principally due to the species' declining or limited population sizes, usually resulting from habitat loss. Also discussed are habitats that are unique, of relatively limited distribution, or of particular value to wildlife. Protected sensitive species are classified by state and/or federal resource management agencies, or both, as threatened or endangered, under provisions of the state and federal endangered species act.

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

Plants: USFWS (2025a), CNDDB (CDFW 2025a), CDFW (2025d, 2025e), CNPS (2025a).

Invertebrate - Crotch's bumble bee *Bombus crotchii:* Leif Richardson, Paul Williams, Robbin Thorp and Sheila Colla, et al. (2022), CDFW (2019, 2023), and CDFW (2025b).

Wildlife: California Wildlife Habitat Relationships (2008), Ornithological Society (2025), American Society of Mammalogists (2025), eBird (2025), iNaturalist (2025), USFWS (2025a), CNDDB (CDFW 2025a), and CDFW (2012, 2025b, 2025c, 2025f).

Habitats: CNDDB (CDFW 2025a, 2025f).

FEDERAL PROTECTION AND CLASSIFICATIONS

The Federal Endangered Species Act of 1973 (FESA) defines an endangered species as "any species that is in danger of extinction throughout all or a significant portion of its range... (USFWS 1973)". Threatened species are defined as "any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to "take" any listed species. "Take" is defined as follows in Section 3(18) of the FESA: "...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Further, the USFWS, through regulation, has interpreted the terms "harm" and "harass" to include certain types of habitat modification as forms of a "take." These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a federal agency for an action that could affect a federally listed plant and animal species, the property owner and agency are required to consult with USFWS. This term is employed in this document but carries no official protections. All references to federally protected species in this report (whether listed, proposed for listing or candidate) include the most current published status or candidate category to which each species has been assigned by USFWS. For purposes of this assessment, the following acronyms are used for federal status species:

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

The designation of critical habitat can also have a significant impact on the development of land designated as "*critical habitat*." The FESA prohibits federal agencies from taking any action that will "*adversely modify or destroy*" critical habitat (16 U.S.C. Section 1536(a)(2)). This provision of the FESA applies to the issuance of permits by federal agencies. Before approving an action affecting critical habitat, the federal agency is

required to consult with the USFWS who then issues a biological opinion evaluating whether the action will "*adversely modify"* critical habitat. Thus, the designation of critical habitat effectively gives the USFWS extensive regulatory control over the development of land designated as critical habitat.

The Migratory Bird Treaty Act of 1918 (MBTA) makes it unlawful to "*take*" any migratory bird or part, nest, or egg of such bird listed in wildlife protection treaties between the United States and Great Britain, the Republic of Mexico, Japan, and the Union of Soviet States (USFWS 1918, 2024). For purposes of the MBTA, "*take*" is defined as to pursue, hunt, capture, kill, or possess or attempt to do the same.

The Bald Eagle and Golden Eagle Protection Act explicitly protects the bald eagle and golden eagle and imposes its own prohibition on any taking of these species (USFWS 1940). As defined in this act, take means to pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, or molest or disturb. Current USFWS policy is not to refer the incidental take of bald eagles for prosecution under the Bald Eagle and Golden Eagle Protection Act (16 U.S.C. 668-668d).

STATE PROTECTION AND CLASSIFICATIONS

California's Endangered Species Act (CESA) defines an endangered species as "...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease" (California Fish and Game Commission 1997). The State defines a threatened species as "...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species." Candidate species are defined as "...a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list." Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission.

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

educational, or management purposes." Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

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

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

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

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

The CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in the State. This organization has compiled an inventory

comprised of the information focusing on geographic distribution and qualitative characterization of rare, threatened, or endangered vascular plant species of California (Tibor 2001). The list serves as the candidate list for listing as threatened and endangered by CDFW. The CNPS has developed five categories of rarity (CRPR):

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

As stated by the CNPS:

> "*Threat Rank is an extension added onto the California Rare Plant Rank and designates the level of endangerment by a 1 to 3 ranking with 1 being the most endangered and 3 being the least endangered. A Threat Rank is present for all California Rare Plant Rank 1B's, 2's, 4's, and the majority of California Rare Plant Rank 3's. California Rare Plant Rank 4 plants are seldom assigned a Threat Rank of 0.1, as they generally have large enough populations to not have significant threats to their continued existence in California; however, certain conditions exist to make the plant a species of concern and hence be assigned a California Rare Plant Rank. In addition, all California Rare Plant Rank 1A (presumed extinct in California), and some California Rare Plant Rank 3 (need more information) plants, which lack threat information, do not have a Threat Rank extension."* (CNPS 2025)

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

LOCAL PROTECTION AND CLASSIFICATIONS

The City of Redlands General Plan 2035 includes policies and actions for the protection and preservation of biological resources and open space conservation. The following Polices and Actions are addressed respective of ensuring compliance with General Plan requirements for open space conservation and biological protection.

General Plan Open Space for Conservation – Section 6.1

Polices - Principles

6-P.1 Develop a balanced and integrated open space system that reflects a variety of considerations, including resource conservation, production of agriculture, recreation, aesthetics, and community identity.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to recreation, aesthetics or community identity. The proposed action would not conflict with Principle 6-P.1.

6-P.2 Designate and develop the Emerald Necklace around the city, consisting of open spaces and conserved lands, that showcase and link unique resources both within and surrounding the Planning Area and serve as a distinct boundary for urban development within Redlands.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not possess or contribute to unique resources. The proposed action would not conflict with Principle 6-P.2.

6-P.3 Seek to link the various elements of the Emerald Necklace through a system of open spaces, waterways, parks, and trails.

No open space conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to open spaces, waterways, parks, and trails. The proposed action would not conflict with Principle 6-P.3.

6-P.4 Preserve and enhance open space and agricultural land to define the Mentone and Crafton areas as distinct from Redlands.

No open space conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the Mentone and Crafton regions. The proposed action would not conflict with Principle 6-P.4.

6-P.5 Encourage the preservation of natural habitat areas as open space.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to regional open space conservation. The proposed action would not conflict with Principle 6-P.5.

6-P.6 Promote access to and views of conservation areas in a manner consistent with good land resource stewardship.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to regional open space conservation. The proposed action would not conflict with Principle 6-P.6.

Polices - Actions

6-A.1 Preserve as open space those areas that contain unique habitats, natural resources, and visual amenities such as citrus groves, hillsides, canyons, and waterways. These areas provide natural contrast with the urban cityscape.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to unique habitats, natural resources, and visual amenities such as citrus groves, hillsides, canyons, and waterways. The proposed action would not conflict with Action 6-A.1.

6-A.2 Identify gaps in the Emerald Necklace and work with San Bernardino County and neighboring cities, conservation organizations, and willing landowners to prioritize land acquisition or other resource preservation strategies in those areas.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to unique habitats, natural resources, and waterways. The proposed action would not conflict with Action 6-A.2.

6-A.3 Identify portions of the Emerald Necklace that are not in public ownership and work with conservation organizations and landowners to ensure that the land is dedicated or otherwise conserved.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the Emerald Necklace. The proposed action would not conflict with Action 6-A.3.

6-A.4 Develop standards for planning, design, management, and maintenance of trails and pathways within parks, preserves, open space, and rights-of-way.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to trails and pathways within parks, preserves, and open space. The proposed action would not conflict with Action 6-A.4.

6-A.5 Develop a long-term plan for the maintenance of open space areas held by the City which may include non-profits, public-private partnerships, and volunteer organizations.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat

and does not contribute to regional conservation goals or objectives. The proposed action would not conflict with Action 6-A.5.

6-A.6 Designate and map open space, recreation areas, and trails contained in the Emerald Necklace.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the Emerald Necklace. The proposed action would not conflict with Action 6-A.6.

6-A.7 Work with San Bernardino County, neighboring cities, conservation organizations, and landowners to maintain and enhance the trails, roadways, and lands within the Emerald Necklace, and to ensure that sensitive resources in these areas are not disturbed or degraded.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the Emerald Necklace. The proposed action would not conflict with Action 6-A.7.

6-A.8 Provide sufficient resources for the maintenance of trails and conservation areas through both volunteer and City mechanisms.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute trails or conservation areas. The proposed action would not conflict with Action 6-A.8.

6-A.9 Develop and implement a wayfinding program along the Emerald Necklace to identify sites of interest and provide directions along trails and roadways. Ensure that any signs are consistently designed and visually compatible with the surroundings.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the Emerald Necklace. The proposed action would not conflict with Action 6-A.6.

6-A.10 Maintain and enhance Redlands' network of urban forest and street trees.

No trees regulated by the City of Redland's Trees and Tree Protection Along Street and Public Places Ordinance (Chapter 12.52) were documented onsite. No Impact. The proposed action would not conflict with Action 6-A.10.

General Plan Biological Resources – Section 6.2

Polices - Principles

6-P.7 Protect environmentally sensitive lands, wildlife habitats, and rare, threatened, or endangered plant and animal communities.

No sensitive lands, rare, threatened or endangered plant or wildlife communities are present within or adjacent to the Project Site.

6-P.8 Minimize disruption of wildlife and valued habitat throughout the Planning Area and emphasize that open space is for more than just human use, but also serves as habitat for biological resources.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to regional open space conservation. The proposed action would not conflict with Principle 6-P.8.

6-P.9 Preserve, protect, and enhance wildlife corridors, including natural watercourses, connecting the San Bernardino National Forest, Santa Ana River Wash, Crafton Hills, San Timoteo and Live Oak Canyons, the Badlands, and other open space areas.

No open space or conservation is proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the San Bernardino National Forest, Santa Ana River Wash, Crafton Hills, San Timoteo and Live Oak Canyons, the Badlands, and other open space areas. The proposed action would not conflict with Principle 6-P.9.

6-P.10 Landscape public areas using native vegetation where practical.

No public areas are proposed onsite. The proposed action would not conflict with Principle 6-P.10.

Polices - Actions

6-A.11 Require a biological assessment of any proposed Project Site within the Planning Area where species that are State or federally listed as rare, threatened, or endangered are identified as potentially present.

The following biological resources technical report assesses the potential for state and/or federally listed rare, threatened, or endangered species.

6-A.12 Require that proposed projects adjacent to, surrounding, or containing wetlands, riparian corridors, or wildlife corridors be subject to a site-specific analysis that will determine the appropriate size and configuration of a buffer zone.

The Project Site is not located adjacent to wetlands riparian corridors, or wildlife corridors.

6-A.13 Utilize conservation easements and preserves as means to conserve natural habitats.

No open space or conservation easements are proposed onsite. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the San Bernardino National Forest, Santa Ana River Wash, Crafton Hills, San Timoteo and Live Oak Canyons, the Badlands, and other open space areas. The proposed action would not conflict with Action 6-A.13.

6-A.14 Construct freeway and arterial street undercrossing or overpasses where necessary to establish and preserve identified wildlife corridors.

No undercrossing or overpasses are proposed. The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does represent a local or regional wildlife movement corridor. The proposed action would not conflict with Action 6-A.14.

6-A.15 Enhance the Mill Creek Zanja and Morey Arroyo and tributary drainages as riparian corridors, where feasible, to provide habitat as well as recreational and aesthetic value consistent with an overall master plan for habitat preservation.

The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to Mill Creek Zanja and Morey Arroyo and tributary drainages. The proposed action would not conflict with Action 6-A.15.

6-A.16 Work with the Crafton Hills Open Space Conservancy to preserve, enhance, and maintain the Crafton Hills as an ecosystem.

The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the Crafton Hills Open Space Conservancy. The proposed action would not conflict with Action 6-A.16.

6-A.17 Coordinate open space and habitat preservation in the Crafton Hills with the City of Yucaipa.

The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the Crafton Hills Open Space Conservancy. The proposed action would not conflict with Action 6-A.17.

6-A.18 Coordinate open space and habitat preservation in San Timoteo and Live Oak canyons with Riverside County.

The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to San Timoteo or Live Oak Canyons. The proposed action would not conflict with Action 6-A.18.

6-A.19 Continue participation in regional planning efforts to protect habitat and environmentally sensitive species, including efforts by the City of Yucaipa on habitat preservation along Yucaipa Creek and in Live Oak Canyon throughout its length.

The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to Yucaipa Creek and in Live Oak Canyons. The proposed action would not conflict with Action 6-A.19.

6-A.20 Work with State and County agencies in developing recovery and restoration plans after natural or manmade disasters to restore natural landscapes, habitats, and functioning ecosystems. As part of the recovery and restoration plans, include evaluation processes and implementation actions. Where appropriate, incorporate the use of native species.

No recovery or restoration plans are proposed or warranted. The proposed action would not conflict with Action 6-A.20.

6-A.21 Ensure that future activities in the Santa Ana River Wash are consistent with the habitat conservation policies of the Upper Santa Ana River Land Management Habitat Conservation Plan (Wash Plan).

The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute directly or indirectly to the Santa Ana River Wash or Upper Santa Ana River Land Management Habitat Conservation Plan. The proposed action would not conflict with Action 6-A.21.

Redlands Municipal Code - Regulated Trees

No trees regulated by the City of Redland's Trees and Tree Protection Along Street and Public Places Ordinance (Chapter 12.52) were documented onsite. No Impact.

SENSITIVE HABITATS

As stated by CDFW:

> "*One purpose of the vegetation classification is to assist in determining the level of rarity and imperilment of vegetation types. Ranking of alliances according to their degree of imperilment (as measured by rarity, trends, and threats) follows NatureServe's Heritage Methodology, in which all alliances are listed with a G (global) and S (state) rank. For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled*". (CDFW 2025f)

No sensitive habitats were documented within the Project Site. The Project Site is characterized as disturbed/ruderal habitat.

SENSITIVE PLANTS

Based on a review of the CNDDB, Redlands General Plan and existing conditions within and adjacent to the Project Site, a total of eighteen (18) sensitive plant species have potential to occur within the vicinity of the property, as presented in Table 2, *Sensitive Plant Species Assessment*.

Table 2.
Sensitive Plant Species Assessment

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
San Diego ambrosia (*Ambrosia pumila*) FE, CRPR 1B.1	Chaparral, coastal sage scrub, valley and foothill grassland, vernal pools. Often in disturbed habitats.	No Potential. Perennial species not detected onsite.
Marsh sandwort (*Arenaria paludicola*) CRPR 1B.1	Perennial stoloniferous herb generally blooming from May to August within marsh and swamp habitats (brackish, freshwater (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or suitable habitats.
Nevin's barberry (*Berberis nevinii*) FE/SE CRPR 1B.1	Perennial evergreen shrub which generally blooms from February to June within chaparral, cismontane woodland, coastal scrub, and riparian scrub in sandy, gravelly substrates (CNPS 2025).	No Potential. Perennial Species not detected onsite.
Smooth tarplant (*Centromadia pungens* ssp. *laevis*) CRPR 1B.1	Annual herb which generally blooms from April to September within chenopod scrub, meadows and seeps, playas, riparian woodland, valley and foothill grassland (alkaline substrates) (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or alkali soils.
Salt Marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*) CRPR 1B.2	Annual herb generally blooming from May to October within coastal dunes, marshes and swamps (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.
Parry's spineflower (*Chorizanthe parryi var. parryi*) CRPR 1B.1	Annual herb which generally blooms from April to June within chaparral, cismontane woodland, coastal scrub and grassland habitats with sandy and/or rocky openings (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
White-bracted spineflower *(Chorizanthe xanti* var. *leucotheca*) CRPR 1B.2	Annual herb which generally blooms from April to June within Mojavean desert scrub, and pinyon and juniper woodland elev. 300-1200 m.	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.
Slender-horned spineflower (*Dodecahema leptoceras*) CRPR 1B.1 FE/SE	Annual herb which generally blooms from April to June within chaparral, cismontane woodland and coastal scrub (alluvial fan) with sandy substrates (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.
Santa Ana River woollystar (*Eriastrum densifolium ssp. sanctorum*) FE/SE CRPR 1B.1	Perennial herb which generally blooms from April to September within chaparral, coastal scrub (alluvial fan) in sandy and gravelly substrates (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.
California satintail *(Imperata brevifolia)* CRPR 2B.1	Perennial rhizomatous herb generally blooms from May to September within Mesic chaparral, coastal scrub, Mojavean desert scrub, meadows and seeps, and riparian scrub elev. 0-1219 m (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.
Hall's monardella *(Monardella macrantha* subsp. *hallii)* CRPR 1B.3	Perennial rhizomatous herb generally blooms from June to October within chaparral, cismontane woodland, valley and foothill grassland, broadleaved upland forest, and lower montane coniferous forest elev. 730-2195 m (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.
Mesa horkelia (*Horkelia cuneata ssp. puberula*) CRPR 1B.1	Perennial herb which generally blooms from February to September within chaparral (maritime), cismontane woodland and coastal scrub with sandy or gravelly substrates (CNPS 2025).	No Potential. Perennial species not detected onsite during assessment survey.
Robinson's pepper-grass (*Lepidium virginicum var. robinsonii*) CRPR 4.3	Annual herb which generally blooms from January to July within chaparral and coastal sage scrub habitats (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Parish's bush-mallow (*Malacothamnus parishii*) CRPR 1A	Perennial deciduous shrub generally blooming from June to July within chaparral and coastal scrub habitats (CNPS 2025).	No Potential. Perennial species not detected onsite during assessment survey.
Salt spring checkerbloom (*Sidalcea neomexicana*) CRPR 2.2	Perennial herb which generally blooms from March to June within chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, and playas within alkaline/mesic gravelly substrates (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.
Prairie wedge grass (*Sphenopholis obtusata*) CRPS 2B.2	Perennial herb generally blooming from April to July within cismontane woodland, meadows and seeps (mesic) (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.
Southern jewelflower (*Streptanthus campestris)* CRPR 1B.3	Perennial herb generally blooming from April to July within openings in chaparral, lower montane coniferous forest, and cismontane woodland elev. 1000-2499 m (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.
San Bernardino aster (*Symphyotrichum defoliatum*) CRPR 1B.2	Perennial rhizomatous herb generally blooming from July to December within various vegetation communities in associating with wetland substrates (ditches, streams and springs) (CNPS 2025).	No Potential. Not expected to occur onsite based on a lack of suitable or undisturbed vegetation or soils.

California Native Plant Society (CNPS): California Rare Plant Rank (CRPR)
CRPR 1A – plants presumed extirpated in California and either rare or extinct elsewhere
CRPR 1B – plants rare, threatened, or endangered in California, but more common elsewhere
CRPR 2A – plants presumed extirpated in California but common elsewhere
CRPR 2B – plants rare, threatened, or endangered in California but more common elsewhere
CRPR 3 – plants about which we need more information, a review list
CRPR 4 – plants of limited distribution, a watch list
.1 – Seriously endangered in California
.2 – Fairly endangered in California
.3 – Not very endangered in California
Federal (USFWS) Protection and Classification
FE – Federally Endangered
FT – Federally Threatened
FPT – Federally Proposed Threatened
FC – Federal Candidate for Listing
State (CDFW) Protection and Classification
SE – State Endangered
ST – State Threatened
SCE – State Candidate Endangered

No suitable habitat for sensitive plant species including those listed as federal or state threatened/endangered was documented within the Project Site. No sensitive plant species listed in Table 2, *Sensitive Plant Species Assessment* or undisturbed habitats or soils were documented or expected to occur within the Project Site. The Project Site is primarily characterized disturbed/ruderal vegetation.

SENSITIVE WILDLIFE

Based on a review of the CNDDB, Redlands General Plan and existing site conditions, a total of forty-six (46) sensitive invertebrate and wildlife species have the potential of occurring within the vicinity of the property, as presented in Table 3, *Sensitive Wildlife Species Assessment*.

Table 3.
Sensitive Wildlife Species Assessment

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
INVERTEBRATES		
Crotch's bumble bee (*Bombus crotchii*) SCE	Range extends from southern to northern California within a variety of habitats including grassland, scrub, chaparral and desert habitats. Food plants include but are not limited to the following genera: *Antirrhinum, Phacelia, Clarkia, Cordylanthus, Dendromecon, Medicago Eschscholzia, Chaenactis, Eriogonum, Hypericum, Lantana, Lupinus, Salvia, Asclepias, Cirsium, Monardella, Keckiella, Acmispon, Euthamia, Ehrendorferia, Vicia,* and/or *Trichostema*.	No Potential. No food sources were documented onsite. The Project Site is annually disked and not located adjacent to native habitat possessing suitable food sources.
Monarch butterfly (*Danaus plexippus*) FC		No Potential. The Project Site does not represent or provide overwintering habitat and no milkweed species (breeding habitat) was documented within the property.
Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*) FE	Restricted to Delhi sand formations in Riverside and San Bernardino Counties.	No Potential. No Delhi soils present onsite, as shown in Figure 6, *Soils Association Map*.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
FISH		
Santa Ana sucker (*Catostomus santaanae*) FT	Preferred habitat, open water and emergent vegetation.	No Potential. No suitable aquatic habitat onsite.
Arroyo chub (*Gila orcuttii*) SSC	Preferred habitat, open water and emergent vegetation in lower gradient streams with sand or mud substrate.	No Potential. No suitable aquatic habitat onsite.
Santa Ana speckled dace (*Rhinichthys gabrielino*) FPT, SSC	Found in the headwaters of the Santa Ana and San Gabriel River drainages. Found in riffles in small streams and shore areas with abundant gravel and rock (City of Redlands 2017).	No Potential. No suitable aquatic habitat onsite.
AMPHIBIANS		
Arroyo Toad (*Anaxyrus californicus*) FE, SSC	The arroyo toad is found in the southern part of the Coast Ranges from northern San Luis Obispo Co. south to Baja California. Its elevation range extends up to 6400 ft (1950 m). This species is found in semi-arid regions near washes or intermittent streams. Habitats used include valley-foothill and desert riparian as well as a variety of more arid habitats.	No Potential. No suitable breeding or upland aestivating habitat onsite.
Western spadefoot (*Spea hammondii*) FPT, SSC	Primary habitat for this species includes suitable breeding habitat below 1500 meters (i.e., vernal pools or other standing water that is free of exotic species) with secondary habitats including adjacent chaparral, sage scrub, grassland, and alluvial scrub habitats.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
REPTILES		
Southern California legless lizard (*Anniella stebbinsi*) SSC	Broadleaved upland forest, chaparral, coastal dunes, and coastal scrub. Occurs in sandy or loose loamy soils under sparse vegetation, generally in moist, loose soil.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
Orange-throated whiptail (*Aspidoscelis hyperythra*) SSC	The orange-throated whiptail occurs in sage scrub and chaparral habitats where loose soils and occasional rocky areas are found.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
Red-diamond rattlesnake (*Crotalus ruber*) SSC	The red-diamond rattlesnake is often found in areas with dense vegetation especially chaparral and sage scrub up to 1,520 meters in elevation.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
California glossy snake (*Arizona elegans occidentalis*) SSC	Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
Coastal western whiptail (*Aspidoscelis tigris stejnegeri*) SSC	The coastal western whiptail occurs in a wide variety of habitats including coastal sage scrub, desert scrub, Riversidean alluvial fan scrub, woodlands, grasslands, playas, and respective ecotones between these habitats.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
Southwestern pond turtle (*Actinemys pallida*) FPT	The western pond turtle inhabits slow moving permanent or intermittent streams, small ponds, small lakes, reservoirs, abandoned gravel pits, permanent and ephemeral shallow wetlands, stock ponds, and sewage treatment lagoons.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property and lack of permanent aquatic water.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Coast horned lizard (*Phrynosoma blainvillii*) SSC	Open areas of sandy soil with coastal sage scrub, chaparral, grassland, riparian, and washes and watercourses.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
Two-striped gartersnake (*Thamnophis hammondii*) SSC	Marsh and swamp, riparian scrub, riparian woodland, and wetland. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property and lack of permanent aquatic water.
BIRDS		
Yellow-breasted chat (*Icteria virens*) SSC	The yellow-breasted chat is associated with riparian woodland and riparian scrub habitats.	No Potential. Not expected to occur within Project Site based on a lack of suitable undisturbed vegetation. No riparian scrub, forest or woodland habitat documented onsite.
Loggerhead shrike (*Lanius ludovicianus*) SSC	This species of shrike hunts in open or grassy areas and nests in large chaparral shrubs such as ceanothus and lemonade berry.	Moderate Potential. The Project Site provides suitable foraging habitat. However, no suitable nesting habitat was documented within the property. The species has been documented approx. 4 miles south of the Project Site in 1999 (CNDDB 2025a)
Coastal California gnatcatcher (*Polioptila californica californica*) FT/SSC	The coastal California gnatcatcher is a non-migratory bird species that primarily occurs within sage scrub habitats in coastal southern California dominated by California sagebrush.	No Potential. Not expected to occur within Project Site based on a lack of suitable undisturbed vegetation.
Yellow warbler (*Setophaga petechia*) SSC	Habitat characteristics of the yellow warbler are well known to include riparian scrub and forest and woodland.	No Potential. Not expected to occur within Project Site based on a lack of suitable undisturbed vegetation. No riparian scrub, forest or woodland habitat documented onsite.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
Least Bell's vireo (*Vireo bellii pusillus*) FE/SE	Least Bell's vireo resides in riparian habitats with a well-defined understory including southern willow scrub, mule fat, and riparian forest/woodland habitats.	No Potential. Not expected to occur within Project Site based on a lack of suitable undisturbed vegetation. No riparian scrub, forest or woodland habitat documented onsite.
Burrowing owl (*Athene cunicularia*) SSC	The burrowing owl uses predominantly open land, including grassland, agriculture, playa, sparse coastal sage scrub, desert scrub habitats. Some breeding burrowing owls are year-round residents and additional individuals from the north may winter throughout the region.	Moderate Potential. Suitable burrows larger than 4 inches in diameter and foraging habitat documented within the Project Site. The species has been documented approx. 3 miles northwest of the Project Site in 2006 (CNDDB 2025a)
White-tailed kite (*Elanus leucurus*) SFP	The white-tailed kite is found in riparian, oak woodlands adjacent to large open spaces including grasslands, wetlands, savannahs and agricultural fields. This non-migratory bird species occurs throughout the lower elevations of California and commonly nests in coast live oaks.	Moderate Potential. May occasionally forage onsite. No breeding habitat is present within or adjacent to the Project Site. The species has been documented approx. 11 miles southwest of the Project Site in 2006 (CNDDB 2025a)
Southwestern willow flycatcher (*Empidonax traillii extimus*) FE/SE	The southwestern willow flycatcher is narrowly distributed at few locations within the Plan Area. Although the preferred habitat, riparian woodland and select other forests, is well distributed within all bioregions and spread over the entire Plan Area, few current locations for the willow flycatcher have been documented.	No Potential. Not expected to occur within Project Site based on a lack of suitable undisturbed vegetation. No riparian scrub, forest or woodland habitat documented onsite.
Golden eagle (*Aquila chrysaetos*) CWL, SFP	Within southern California, the species prefers grasslands, brushlands (coastal sage scrub and chaparral), deserts, oak savannas, open	Low Potential. May occasionally forage onsite. No breeding habitat is present within or adjacent to the Project Site.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
	coniferous forests, and montane valleys.	
Cooper's hawk (*Accipiter cooperii*) SSC	Cooper's hawk is most commonly found within or adjacent to riparian/oak forest and woodland habitats. This uncommon resident of California increases in numbers during winter migration.	Low Potential – May occasionally forage within the Project Site.
Sharp-shinned hawk (*Accipiter striatus*) CWL	Potential habitat for the sharp-shinned hawk includes montane coniferous forest for potential breeding areas and riparian scrub, woodland, forest habitat, oak woodland and forest, chaparral, coastal sage scrub, desert scrub, and Riversidean alluvial fan sage scrub for foraging.	Low Potential – May occasionally forage within Project Site. However, no breeding habitat is located within or adjacent to the Project Site.
Tri-colored blackbird (*Agelaius tricolor*) ST/SSC	Marshes, grasslands. Breeding colonies require nearby water, nesting substrate, foraging habitat of grassland, woodland, agricultural cropland.	No Potential. Not expected to breed of forage onsite based on a lack of nesting habitat (cattail, rushes, and willows) within or adjacent to the Project Site.
Northern harrier (*Circus cyaneus*) SSC	The northern harrier frequents open wetlands, wet/lightly grazed pastures, fields, dry uplands/prairies, mesic grasslands, drained marshlands, croplands, meadows, grasslands, open rangelands, fresh and saltwater emergent wetlands.	Low Potential – May occasionally forage within Project Site. However, no breeding habitat is located within or adjacent to the Project Site.
Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) FT/SE	Riparian. Uncommon to rare summer resident of valley foothill and desert riparian habitats.	No Potential. Not expected to occur within Project Site based on a lack of suitable undisturbed vegetation. No riparian scrub, forest or woodland habitat documented onsite.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
California horned lark (*Eremophila alpestris actia*) CWL	Habitat for the California horned lark includes agriculture (field croplands), grassland, cismontane alkali marsh, playa and vernal pool habitat, Riversidean alluvial fan sage scrub, and coastal sage scrub. It has been recorded in chaparral and riparian habitat - however these are not typical habitats used by the species.	Moderate Potential – Expected to occasionally forage and nest onsite. The species has been documented approx. 2.5 miles west of the Project Site in 2001 (CNDDB 2025a)
Merlin (*Falco columbarius*) CWL	Grasslands, coastal sage scrub and estuaries, windrows, open fields.	Low Potential – May occasionally forage within Project Site.
Prairie falcon (*Falco mexicanus*) CWL	Habitat use of the prairie falcon includes annual grasslands to alpine meadows. The prairie falcon is associated primarily with perennial grasslands, savannahs, rangeland, some agricultural fields during the winter season, and desert scrub areas, all typically dry environments of western North American where there are cliffs or bluffs for nest sites.	Low Potential – May occasionally forage within Project Site.
Long-eared owl (*Asio otus*) SCC	Scarce and local in forests and woodlands throughout much of the Northern Hemisphere. Rare resident in coastal southern California. Nests and roosts in dense willow-riparian woodland and oak woodland, but forages over wider areas. Breeds from valley foothill hardwood up to ponderosa pine habitat. (City of Redlands 2017)	Low Potential. May occasionally forage onsite. No breeding habitat is present within or adjacent to the Project Site.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
MAMMALS		
Pallid bat (*Antrozous pallidus*) SSC	Chaparral, coastal scrub, desert wash, Great Basin grassland, Great Basin scrub, Mojavean desert scrub, riparian woodland, Sonoran desert scrub, upper montane coniferous forest, and valley and foothill grassland. Oak and grassland ecotones. Prefers foraging in the open. Roosts in attics or rock cracks; in the open, near foliage at night.	No Potential. Not expected to occur within the Project Site based on a lack of suitable undisturbed habitats.
Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*) SSC	The northwestern San Diego pocket mouse occurs in coastal sage, upland sage scrubs, and alluvial fan sage scrub, sage scrub/grassland ecotones, chaparral, and desert scrubs at all elevations up to 6,000 feet.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
San Bernardino kangaroo rat (*Dipodomys merriami parvus*) FE/SSC	Prefers alluvial scrub, coastal sage scrub habitats with sandy and gravelly substrates.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
Stephens' kangaroo rat (*Dipodomys stephensi*) FE/ST	The Stephens' kangaroo rat is found almost exclusively in open grasslands or sparse shrublands with cover of less than 50 percent during the summer.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
Western mastiff bat (*Eumops perotis californicus*) SSC	Roosts in rocky areas and forages in grassland, shrublands, and woodlands.	No Potential. Not expected to occur within the Project Site based on a lack of suitable undisturbed habitats.
Western yellow bat (*Lasiurus xanthinus*) SSC	Roosts in the skirts of palm trees and forages in adjacent habitats.	No Potential. Not expected to occur within the Project Site based on a lack of suitable undisturbed habitats.

Species Name (*Scientific Name*) Status	**Habitat Description**	**Comments**
San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) SSC	The San Diego black-tailed jackrabbit in open habitats, primarily including grasslands, sage scrub, alluvial fan sage scrub, and Great Basin sage scrub.	No Potential. Not expected to occur within the Project Site based on a lack of suitable undisturbed habitats. Not detected onsite during habitat assessment.
San Diego desert woodrat (*Neotoma lepida intermedia*) SSC	Riversidean and coastal sage scrub, chaparral and nonnative grasslands. Shrub and desert habitats, primarily associated with rock outcroppings, boulders, cacti, or areas of dense undergrowth.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
Southern Grasshopper mouse (*Onychomys torridus ramona*) SSC	Believed to inhabit sandy or gravelly valley floor habitats with friable soils in open and semi-open scrub, including coastal sage scrub, mixed chaparral, low sagebrush, riparian scrub, and annual grassland with scattered shrubs, preferring low to moderate shrub cover. Known from arid portions of southwestern California and northwestern Baja California (City of Redlands 2017).	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
Pocketed free-tailed bat (*Nyctinomops femorosaccus*) SSC	Desert habitats. Roosts in rock crevices in cliffs.	No Potential. Not expected to occur within the Project Site based on a lack of suitable undisturbed habitats.
Los Angeles pocket mouse (*Perognathus longimembris brevinasus*) SSC	Low elevation grassland alluvial sage scrub and coastal sage scrub habitats.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.
American badger (*Taxidea taxus*) SSC	The American badger prefers friable soils in open grassland and scrub habitat in southern California.	No Potential. Not expected to occur onsite based on a lack of suitable undisturbed habitats, soils and historic disturbance throughout the property.

Species Name (*Scientific Name*) Status	Habitat Description	Comments
Federal (USFWS) Protection and Classification FE – Federally Endangered FT – Federally Threatened FPT – Federally Proposed Threatened FC – Federal Candidate for Listing **State (CDFW) Protection and Classification** SE – State Endangered SCE – State Candidate Endangered SSC – State Species of Special Concern CWL – California Watch List SFP – State Fully Protected SC – State Candidate for Listing		

The habitats documented within the Project Site have a low to high likelihood of occurrence for the following eleven (11) sensitive species:

- Burrowing owl (*Athene cunicularia)* SSC - foraging, refugia and nesting.
- Loggerhead shrike (*Lanius ludovicianus*) SSC - foraging
- White-tailed kite (*Elanus leucurus*) SFP - foraging
- Golden eagle (*Aquila chrysaetos*) CWL, SFP - foraging
- Cooper's hawk (*Accipiter cooperii*) SSC - foraging
- Sharp-shinned hawk (*Accipiter striatus*) CWL - foraging
- Northern harrier (*Circus cyaneus*) SSC - foraging
- California horned lark (*Eremophila alpestris actia*) CWL- foraging and nesting.
- Merlin (*Falco columbarius*) CWL - foraging
- Prairie falcon (*Falco mexicanus*) CWL - foraging
- Long-eared owl (*Asio otus*) SCC - foraging

The Project Site does not occur within or adjacent to a USFWS designated critical habitat for any federally listed threatened or endangered species.

REGIONAL CONNECTIVITY/WILDLIFE MOVEMENT CORRIDORS

Overview

Wildlife corridors link areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of open space areas by urbanization creates isolated “islands” of wildlife habitat. In the absence of habitat linkages that allow movement to adjoining open space areas, various studies have concluded that some wildlife species, especially the larger and more mobile mammals, will not likely persist over time in fragmented or isolated habitat areas because they prohibit the infusion of new individuals and genetic information (MacArthur and Wilson 1967). Corridors effectively act as links between different populations of a species. A group of smaller populations (termed “demes”) linked together via a system of corridors is termed a “metapopulation.” The long-term health of each deme within the metapopulation is dependent upon its size and the frequency of interchange of individuals (immigration vs. emigration). The smaller the deme, the more important immigration becomes, because prolonged inbreeding with the same individuals can reduce genetic variability. Immigrant individuals that move into the deme from adjoining demes mate

with individuals and supply that deme with new genes and gene combinations that increases overall genetic diversity. An increase in a population's genetic variability is generally associated with an increase in a population's health. Corridors mitigate the effects of habitat fragmentation by:

(1) allowing animals to move between remaining habitats, which allows depleted populations to be replenished and promotes genetic diversity;
(2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events (such as fires or disease) will result in population or local species extinction; and
(3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs (Noss 1983; Fahrig and Merriam 1985; Simberloff and Cox 1987; Harris and Gallagher 1989).

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

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

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

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

Wildlife Movement within Project Site

The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the San Bernardino National Forest, Santa Ana River Wash, Crafton Hills, San Timoteo and Live Oak Canyons, the Badlands, and other open space areas. The proposed action would not conflict with Principle 6-P.9 of the City of Redlands General Plan.

In 2008, the South Coast Missing Linkages project was initiated and represented a highly collaborative inter-agency effort to identify and conserve the highest-priority linkages and wildlife corridors in the South Coast Ecoregion within which the City of Redlands is located (South Coast Wildlands. 2008). As stated by the South Coast Wildlands:

> "*The South Coast Missing Linkages project has developed a comprehensive plan for such a regional network that would maintain and restore critical habitat linkages between existing reserves. These linkages form the backbone of a conservation strategy for southern California where the whole would be greater than the sum of the parts. This strategy represents the best hope for maintaining what remains of southern California's wildlife legacy, while ensuring quality of life for our citizens via clean air, clean water, and recreational opportunities*." (South Coast Wildlands 2008)

The Project Site is not located within or adjacent to a wildlife movement corridor or linkage designated in the South Coast Missing Linkages project.

JURISDICTIONAL RESOURCES

The Project Site was assessed for the potential presence/absence of USACE, CDFW, and RWQCB jurisdictional resources. No jurisdictional resources regulated by USACE, CDFW, and RWQCB are present within or adjacent to the Project Site.

Impacts to water quality would be less than significant during both construction and operation following preparation of a WQMP, SWPPP and compliance with the City of Redlands Storm Water Program/NPDES permit and Area-Wide Urban Storm Water Runoff Management Program Municipal Separate Stormwater Sewer System (MS4s) code provisions.

ENVIRONMENTAL IMPACTS

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

THRESHOLD OF SIGNIFICANCE

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

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

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

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

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

DIRECT IMPACTS

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

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		**X**		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				**X**
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				**X**
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		**X**		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				**X**
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Native Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				**X**

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

Less than Significant with Mitigation. The 8.14-acre Project Site would not have a substantial adverse effect, either directly or through habitat modifications, on any plant species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. No native undisturbed suitable habitat, soils or sensitive plant species observations were documented or expected to occur within the Project Site, as outlined in Table 2. *Sensitive Plant Species Assessment*. Therefore, no mitigation is required or proposed.

The 8.14-acre Project Site may result in a substantial adverse effect, either directly or through habitat modifications, on wildlife species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, as outlined in Table 3, *Sensitive Wildlife Species Assessment*. The habitats documented within the Project Site have a low to high likelihood of occurrence for eleven(11) sensitive species.

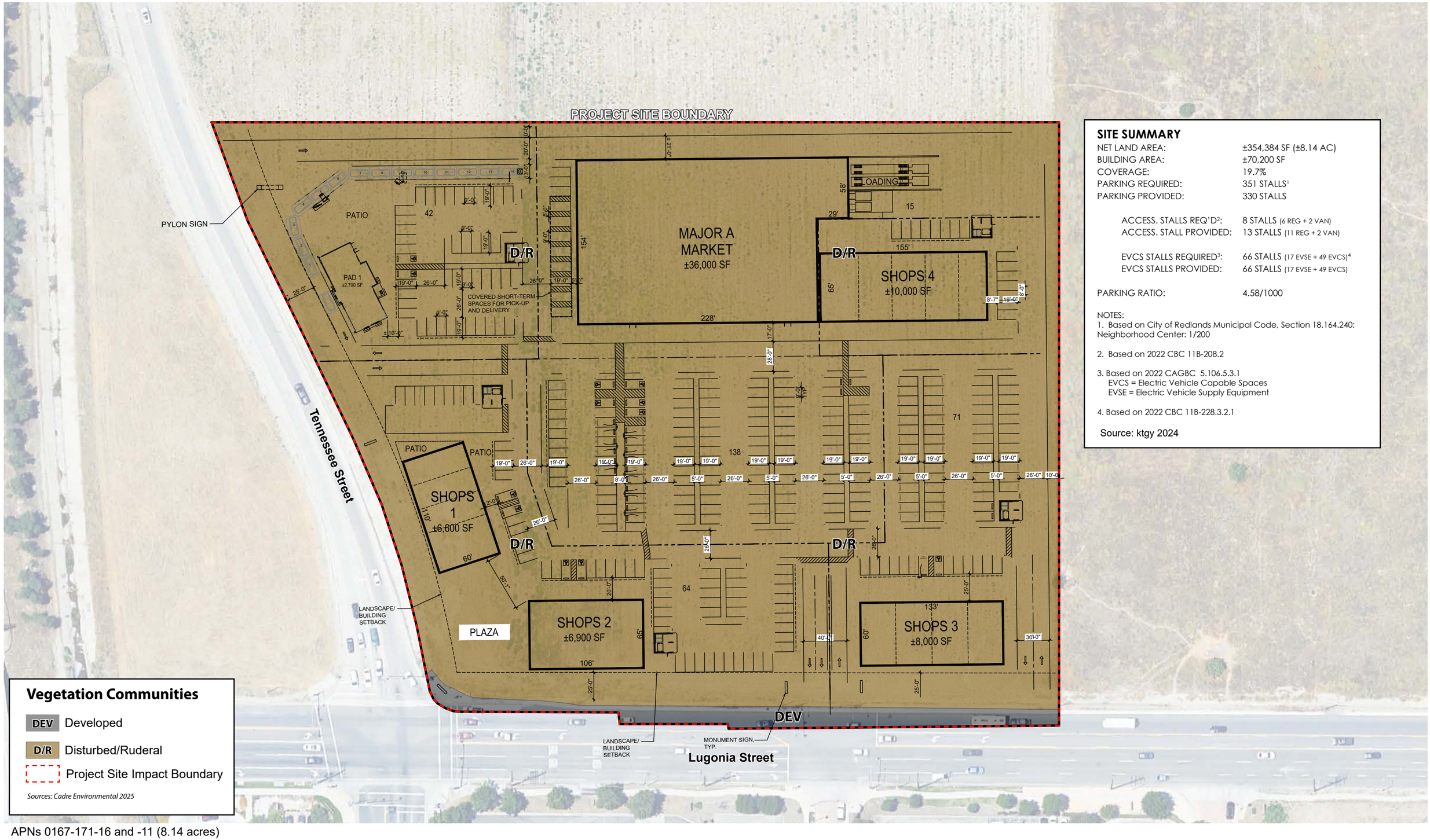
Suitable burrows >4 inches in diameter potentially utilized for refugia and/or nesting were documented in the southeast region of the Project Site and the balance of the property provides suitable foraging habitat for the burrowing owl. To ensure that potential adverse effects to burrowing owl are reduced to a less than significant level, a preconstruction survey will be required prior to initiation of project activities, as summarized in **BIO-CM-1**.

Suitable foraging habitat for nine (9) sensitive species including loggerhead shrike, white-tailed kite, golden eagle, Cooper's hawk, sharp-shinned hawk, northern harrier, merlin, prairie falcon, and long-eared owl was documented within the Project Site. Impacts to 8.06-acre of disturbed/ruderal habitat is not expected to result in a significant impact to regional foraging resources for these species. No mitigation proposed.

Suitable foraging and nesting habitat for one additional sensitive species, California horned lark, was documented within the Project Site. To ensure that potential adverse effects to California horned lark are reduced to a less than significant level, a focused nesting survey will be required prior to initiation of project activities, as summarized in **BIO-CM-2**.

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

No Impact. A total of 8.14-acres of developed and disturbed/ruderal vegetation communities within the Project Site will be directly and permanently impacted as a result of project implementation, as summarized in Table 4, *Vegetation Community Impacts,* and illustrated on Figure 7*, Vegetation Communities Impact Map*. No riparian or sensitive habitat identified in local or regional plans, policies, regulations, or by CDFW or USFWS will be impacted as a result of project initiation.



SITE SUMMARY

NET LAND AREA:	±354,384 SF (±8.14 AC)
BUILDING AREA:	±70,200 SF
COVERAGE:	19.7%
PARKING REQUIRED:	351 STALLS[1]
PARKING PROVIDED:	330 STALLS
ACCESS. STALLS REQ'D[2]:	8 STALLS (6 REG + 2 VAN)
ACCESS. STALL PROVIDED:	13 STALLS (11 REG + 2 VAN)
EVCS STALLS REQUIRED[3]:	66 STALLS (17 EVSE + 49 EVCS)[4]
EVCS STALLS PROVIDED:	66 STALLS (17 EVSE + 49 EVCS)
PARKING RATIO:	4.58/1000

NOTES:
1. Based on City of Redlands Municipal Code, Section 18.164.240: Neighborhood Center: 1/200

2. Based on 2022 CBC 11B-208.2

3. Based on 2022 CAGBC 5.106.5.3.1
EVCS = Electric Vehicle Capable Spaces
EVSE = Electric Vehicle Supply Equipment

4. Based on 2022 CBC 11B-228.3.2.1

Source: ktgy 2024

Vegetation Communities

- DEV — Developed
- D/R — Disturbed/Ruderal
- Project Site Impact Boundary

Sources: Cadre Environmental 2025

APNs 0167-171-16 and -11 (8.14 acres)

Figure 7 - Vegetation Communities Impact Map
Biological Resources Technical Report
Regency Centers, City of Redlands

CADRE Environmental

N

1 inch = 80 feet

Table 4.
Vegetation Community Impacts

Vegetation Community	Project Site Acres	Project Site Acres Impacts
Disturbed/Ruderal	8.06	8.06
Developed	0.08	0.08
TOTAL	**8.14**	**8.14**

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site was assessed for the potential presence/absence of USACE, CDFW, and RWQCB jurisdictional resources. No jurisdictional resources regulated by USACE, CDFW, and RWQCB are present within or adjacent to the Project Site.

Impacts to water quality would be less than significant during both construction and operation following preparation of a WQMP, SWPPP and compliance with the City of Redlands Storm Water Program/NPDES permit and Area-Wide Urban Storm Water Runoff Management Program Municipal Separate Stormwater Sewer System (MS4s) code provisions.

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

Less than Significant with Mitigation. The Project Site possesses suitable habitat for ground nesting migratory birds protected under the MBTA and the CDFG Code Sections 3503, 3503.5, and 3513. In order to avoid violation of the MBTA and the CDFG Codes, site preparation activities (ground disturbance, construction activities, and staging equipment) for the project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird/raptor species (generally February 1st to August 31st).

Construction outside the nesting season (between September 1st and January 31sth) does not require preconstruction nesting bird surveys. However, if construction is proposed between February 1st to August 31st, a qualified biologist will conduct a preconstruction nesting bird and raptor survey(s) no more than three (3) days prior to initiation of grading to document the presence or absence of nesting birds or raptors within or directly adjacent to the Project Site. Loss of an active nest would be considered a potentially significant impact. Impacts to raptor foraging and potential nesting bird habitat would be reduced to less than significant with the implementation of **BIO-CM-2.**

The Project Site is completely surrounded by high traffic roads, commercial development and ruderal/disturbed habitat and does not contribute to the San Bernardino National Forest, Santa Ana River Wash, Crafton Hills, San Timoteo and Live Oak Canyons, the Badlands, and other open space areas. The proposed action would not conflict with

Principle 6-P.9 of the City of Redlands General Plan. The Project Site is not located within or adjacent to a wildlife movement corridor or linkage designated in the South Coast Missing Linkages project. No mitigation or urban wildlands interface avoidance measures required or proposed.

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

No Impact. No trees regulated by the City of Redland's Trees and Tree Protection Along Street and Public Places Ordinance (Chapter 12.52) were documented onsite. No Impact.

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

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

INDIRECT IMPACTS

To ensure that potential indirect adverse effects to sensitive species and resources are reduced to a less than significant level, the following measures will be implemented.

Water Quality

Impacts to water quality would be less than significant during both construction and operation following preparation of a WQMP, SWPPP and compliance with the City of Redlands Storm Water Program/NPDES permit and Area-Wide Urban Storm Water Runoff Management Program Municipal Separate Stormwater Sewer System (MS4s) code provisions.

Toxics

Toxic sources within the Project Site would be limited to those commonly associated with mixed-use and commercial developments such as pesticides, insecticides, herbicides, fertilizers, and vehicle emissions. Impacts to water quality would be less than significant during both construction and operation following preparation of a WQMP, SWPPP and compliance with the City of Redlands Storm Water Program/NPDES permit and Area-Wide Urban Storm Water Runoff Management Program Municipal Separate Stormwater Sewer System (MS4s) code provisions.

Lighting

No impacts related to lighting would occur during both construction and operation. The Project Site is not located adjacent to any conserved open space habitats or sensitive biological resources. No impact.

Noise

Noise and vibration associated with the use of heavy equipment during project construction has the potential to disrupt bird nesting, foraging and breeding behavior within or adjacent to the Project Site. Conservation Measure **BIO-CM-2**: Regulatory Requirement MBTA & CDFG Code has been incorporated into the project to collectively contribute to reducing potential indirect noise impacts to nesting bird species located within or adjacent to the Project Site. Less than significant with mitigation.

CUMULATIVE IMPACTS

The direct and/or indirect impacts of the project would not result in significant cumulative impacts (CEQA Section 15310) to environmental resources within the region of the Project Site. Cumulative impacts refer to incremental effects of an individual project when assessed with the effects of past, current, and proposed projects. The project represents the development of 8.14 acres of primarily disturbed/ruderal habitat surrounded by commercial, high traffic roads, disturbed habitats and therefore will not result in an adverse cumulative impact to sensitive resources. Impacts related to buildout of the City of Redlands are anticipated to be less than significant if projects comply with the City of Redlands General Plan 2035 policies principles/actions. Following implementation of the following conservation measures, the proposed action would not conflict with the general plan policies for the protection of sensitive resources.

CONSERVATION MEASURES

To ensure that potential adverse effects to sensitive species and resources are reduced to a less than significant level, the following conservation measures shall be implemented prior to project approval and initiation of construction, as warranted and summarized in **BIO-CM-1** and **BIO-CM-2**.

BIO-CM-1 Preconstruction Burrowing Owl Surveys

To ensure the proposed action does not result in direct or indirect impacts to the burrowing owl, a preconstruction survey will be conducted no less than 14-days prior to the initiation of ground-disturbing activities to ensure protection for this species including a survey conducted with 24 hours of start of work. The preconstruction surveys will be conducted in compliance with CDFW guidelines (CDFW 2012). A report of the findings prepared by a qualified biologist shall be submitted to the City of Redlands prior to any permit or approval for ground disturbing activities. If burrowing owls are not detected onsite, the proposed action may proceed. However, if project initiation is delayed more than 14-days, updated preconstruction surveys may be required.

If burrowing owls are detected onsite during the focused or preconstruction surveys a burrowing owl monitoring and/or relocation plan will be developed and approved by the City of Redlands, CDFW and USFWS prior to any permit or approval for ground disturbing activities. At a minimum, the plan will include the following:

1. Burrowing owl status, distribution and habitat utilization within and adjacent to the Project Site.

2. Conservation objectives and goals developed in cooperation with CDFW and USFWS.
3. Results of burrowing owl monitoring activities.
    a. 350-ft. minimum protective (no work) zone will be designated around each of the occupied burrow sites and delineated by orange silt fencing. The installation of the fencing will be monitored by a qualified biologist to ensure owls are not directly or indirectly impacted as a result of fence installation. The monitoring biologist will also be responsible for directing where the fencing shall be installed.
    b. A qualified monitoring biologist will monitor the owls weekly during the non-breeding season to determine if the 500-ft. protective zone is adequate for their protection. The weekly monitoring events will also provide critical information regarding the status of the species onsite for purposes of developing a relocation plan.
    c. A qualified monitoring biologist will conduct an initial environmental briefing with any contractors which will be working onsite. The briefing will include a discussion of burrowing owl natural history, identification of burrowing owl non-breeding season protection zones, and summary of penalties for directly and/or indirectly impacting the species.
    d. A qualified monitoring biologist will be authorized to stop all work activities in the event potential direct and/or indirect impacts to burrowing owl may occur as a result of proposed staging activities.
    e. Monthly updates on the monitoring efforts including recommendations, as warranted, will be submitted to the City of Redlands, CDFW and USFWS.
4. Passive and/or active relocation activities and approach.
5. Burrowing owl management activities for active relocation sites.

Based on the candidacy or listing status of the species at the time of surveys, if detected, acquisition of an Incidental Take Permit (ITP) may also be required. The CDFW will be contacted to determine appropriate conservation measures to prevent direct/indirect impacts to the species, or acquisition of an ITP. To initiate the ITP process, the applicant or representative will contact the appropriate CDFW Regional Office and submit an ITP application. The CDFW will accept applications in any form, but they must be submitted to the Regional Manager and they must include the following:

1. The appropriate application fee.
2. Applicant’s full name, mailing address, and telephone number(s). If the applicant is a corporation, firm, partnership, association, institution, or public or private agency, the name and address of the person responsible for the project or activity requiring the permit, the president or principal officer, and the registered agent for the service of process.
3. The common and scientific names of the species to be covered by the permit and the species' status under CESA.
4. A complete description of the project or activity for which the permit is sought.
5. The location where the project or activity is to occur or to be conducted.
6. An analysis of whether and to what extent the project or activity for which the permit is sought could result in the taking of species to be covered by the permit.
7. An analysis of the impacts of the proposed taking on the species.

8. An analysis of whether issuance of the ITP would jeopardize the continued existence of a species. A complete, responsive jeopardy analysis shall include consideration of the species' capability to survive and reproduce, and any adverse impacts of the taking on those abilities in light of:
9. Known population trends,
10. Known threats to the species.
11. Reasonably foreseeable impacts on the species from other related projects and activities.
12. Proposed measures to minimize and fully mitigate the impacts of the proposed taking.
13. A proposed plan to monitor compliance with the minimization and mitigation measures and the effectiveness of the measures.
14. A description of the funding sources and the level of funding available for implementation of the minimization and mitigation measures.
15. Certification in the following language: I certify that the information submitted in this application is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to suspension or revocation of this permit and to civil and criminal penalties under the laws of the State of California.
16. Documentation of CEQA compliance.

BIO-CM-2: Regulatory Requirement MBTA & CDFG Code

In order to avoid violation of the federal MBTA and CDFG Code Sections 3503, 3503.5, and 3513, site preparation activities (ground disturbance, construction activities, and staging equipment) for the project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species (February 1st to August 31st).

Construction outside the nesting season (between September 1st and January 31sth) does not require preconstruction nesting bird surveys. If site-preparation activities are proposed during the nesting/breeding season (February 1st to August 31st), the project proponent shall retain a qualified avian biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the project to determine if active nests of species protected by the MBTA or the CDFG Codes are present in the construction zone. The nest surveys shall include the Project Site where project activities have the potential to cause nest failure. The survey results shall be provided to the City of Redlands for review and approval. The project applicant shall adhere to the following:

1. The project applicant shall retain a qualified biologist experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.

2. Pre-activity field surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of project activities. Surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration shall take into consideration the size of the property; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

If no nesting birds are observed during the survey, site preparation and construction activities may begin. However, if active nests (including nesting raptors) are located, then avoidance or minimization measures shall be undertaken in consultation with the City of Redlands, CDFW and USFWS, as warranted. Measures shall include immediate establishment of an appropriate buffer zone to be established by a qualified biologist based on their best professional judgement and experience. The buffer around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines nesting species have fledged and the nest is no longer active or the nest has failed. The biologist shall monitor the nest at the onset of project activities and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the biologist determines that such project activities may be causing an adverse reaction, the biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The onsite biologist shall review and verify compliance with these nesting avoidance buffers and shall verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found.

Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City of Redlands for review and approval prior to initiation of construction activities.

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

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