



March 23, 2026

**REDLANDS PIONEER PARTNERS, LLC**

**C/O CITIVEST**

Attention: *Qantas Corman and Michael Mossman*

4350 Von Karman Ave., Suite 200

Newport Beach, CA 92660

**SUBJECT: Burrowing Owl Suitability Assessment for an Approximately 31.6 Acre Project Located in the City of Redlands, San Bernardino County, California.**

**Introduction**

This report contains the findings of ELMT Consulting's burrowing owl suitability assessment for an approximately 31.6 acre project located at the southeast corner of West Pioneer Avenue and the future Tennessee Street, north of San Bernardino Avenue within Assessor Parcel Numbers (APNs) 016-709-109, -110, -111, and -112 in the City of Redlands, San Bernardino County, California.

**Project Location**

The proposed project site is generally located north of Interstate 10, east of State Route 210, south of State Route 330, and west of State Route 38 in the City of Redlands, San Bernardino County, California. The site is depicted on the Redlands quadrangle of the United States Geological Survey's (USGS) 7.5-minute topographic map series within Section 16 of Township 1 South, Range 3 West. Specifically, the 31.6-acre proposed project site is located at the southeast corner of the intersection of West Pioneer Avenue and the future Tennessee Street, north of San Bernardino Avenue, within APNs 016-709-109, -110, -111, and -112.

**Project Description**

The proposed development will include up to 282 residential units including 275 single family residences and seven multifamily residences.

**Species Background**

In October 2024, the California Fish and Game Commission listed the burrowing owl as a candidate species under CESA. Therefore, it must be afforded the same protection as if it was a listed species. The burrowing owl is a grassland specialist distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls use a wide variety of arid and semi-arid environments with well-drained, level to gently-sloping areas characterized by sparse vegetation and bare ground (Haug and Didiuk 1993; Dechant et al. 1999). Burrowing owls are dependent upon the presence of burrowing mammals (such as ground squirrels) whose burrows are used for roosting and nesting (Haug and Didiuk 1993). The presence or absence of colonial mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-made cavities, such as buried

and non-functioning drain pipes, stand-pipes, and dry culverts. Burrowing mammals may burrow beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing line-of-sight observation of the surrounding habitat to forage as well as watch for predators.

### **Methodology**

Prior to conducting the suitability assessment on March 11, 2026, binoculars were used to scan all suitable habitats on and adjacent to the property, including perch locations, to establish owl presence.

All suitable areas of the project site and a 500-foot buffer were surveyed on foot, where accessible, by walking slowly and methodically while recording/mapping areas that may represent suitable owl habitat onsite. Survey areas which were inaccessible on foot were observed via binoculars for sign of burrowing owl or suitable burrowing owl habitat. Primary indicators of suitable burrowing owl habitat, but are not limited to native and non-native grassland, interstitial grassland within shrub lands, shrub lands with low density shrub cover, golf courses, drainage ditches, earthen berms, unpaved airfields, pastureland, dairies, fallow fields, and agricultural use areas. Burrowing owls typically use burrows made by fossorial mammals, but they often utilize man-made structures, such as earthen berms, cement culverts, cement, asphalt, rock, wood debris piles, openings beneath cement or asphalt pavement. Burrowing owls are often found within, under, or in close proximity to man-made structures.

A systematic survey for burrows, including burrowing owl sign, was conducted by walking across all suitable habitats mapped within the project site. Pedestrian survey transects were spaced to allow 100% visual coverage of the ground surface. The distances between transect centerlines were no more than 30 meters (approximately 100 feet) apart, and owing to the terrain, often much smaller. Transect routes were also adjusted to account for topography and in general ground surface visibility. Areas providing potential habitat for burrowing owls were surveyed for suitable burrows, consisting of natural and non-natural substrates in areas with low, open vegetation. All burrows encountered were examined for shape, scat, pellets, white-wash, feathers, tracks, and prey remains. Suitable burrows/sites, including rock piles and non-natural substrates, were thoroughly examined for signs of presence.

### **Existing Site Conditions**

The project site is located in a mostly developed area in the northwest portion of the City of Redlands. Industrial, commercial, and residential developments are clustered through the area with a mix of undeveloped parcels. The site is bounded to the east by a residential development; to the west by State Route 210 with commercial development beyond; to the north by West Pioneer Road with institutional and undeveloped, vacant land beyond; and to the south by San Bernardino Avenue with undeveloped, vacant land beyond. The site itself primarily supports undeveloped land, highly disturbed land that does not support any natural plant communities, with project site parcels divided by Tennessee Street running from north to south through the center of the project site. The project site is subject to routine weed abatement activities (i.e., disking).

The project site does not support any natural plant communities. The site supports two (2) land cover types that would be classified as disturbed and developed (refer to Exhibit 5, *Vegetation*, in Attachment A). Refer to Attachment B, *Site Photographs*, for representative site photographs.

The majority of the project site supports disturbed land that has been subjected to historic agricultural land uses and weed abatement activities, off-road vehicular use, and illicit dumping. Frequent disturbance has prevented the reestablishment of natural plant communities. Vegetative density in these areas varies from often barren to minimally vegetated, usually with weedy/early successional species. Common plants observed in the disturbed areas of the site include short podded mustard (*Hirschfeldia incana*), telegraphweed (*Heterotheca grandiflora*), sacred datura (*Datura wrightii*), cheeseweed (*Malva ambigua*), London rocket (*Sisymbrium irio*), redstem filaree (*Erodium cicutarium*), Mexican fan palm (*Washingtonia robusta*), common fiddleneck (*Amsinckia menziesii*), Russian thistle (*Salsola sp.*), and Mediterranean grass (*Schismus barbatus*). Additionally, one Mexican elderberry (*Sambucus mexicana*) exists along the center of the western boundary.

Developed land exists along the north-south central axis of the project site where Tennessee Road bisects the site. The land consists of a paved road that supports few plants due to the impermeable surface. A few, hardy weedy species exist near the borders of the road such as those within the disturbed portions of the site.

### **Survey Results**

Despite a systematic search of the project site, no burrowing owls or sign (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. The majority of the project site is unvegetated and/or vegetated with a variety of low-growing plant species that allow for line-of-sight observation favored by burrowing owl that are subject to routine weed abatement activities. However, no suitable mammal burrows or structures/pipes that have the potential to provide suitable burrowing owl nesting habitat (>4 inches in diameter) were observed within the boundaries of the site. Further, trees surrounding the site, and surrounding electrical poles along the northern and southern boundaries provide suitable perching opportunities for large raptors (i.e., red-tailed hawk) that can prey on burrowing owl. It should be noted that a red-tailed hawk was observed foraging over the site during the field investigation.

### **Conclusion**

Based on the results of the updated assessment, the project site is considered to have low potential to support burrowing owl; therefore, focused surveys are not recommended. Ongoing weed abatement activities (e.g., disking) have minimized burrow establishment, further reducing the site's suitability for burrowing owls.

Out of an abundance of caution, a pre-construction burrowing owl clearance survey is recommended to be conducted prior to development to ensure burrowing owl remain absent from the project site.

### **Recommendations**

#### **Pre-Construction Burrowing Owl Clearance Survey**

To ensure burrowing owl remain absent from the project site, a pre-construction burrowing owl clearance survey shall be conducted in accordance with CDFW's 2012 Staff Report on Burrowing Owl Mitigation. Two surveys shall be conducted, the first 14-30 days prior to ground disturbing activities and the second within 24 hours immediately before ground disturbing activities. If no burrowing owls are observed onsite, no further review will be required.

If the site survey determines the presence of burrowing owl, mitigation in accordance with requirements set forth by CDFW shall be implemented as follows:

- A. If burrowing owls are found on the project site, construction activities should be avoided during the breeding season (February 1 to August 31).
- B. If an active burrow is found during the breeding season and construction activities cannot be avoided, a qualified biologist will establish buffers around occupied burrowing owl nests in accordance with the *Staff Report on Burrowing Owl Mitigation, State of California Natural Resource Agency, Department of Fish and Game (May 7, 2012)* to avoid any direct or indirect impacts to burrowing owl.
- C. If impacts to active burrows cannot be avoided, coordination will need to occur with CDFW to determine whether a California Endangered Species Act (CESA) Incidental Take Permit (ITP) will be required pursuant to Fish and Game Code section 2081. As part of the ITP, a plan to minimize and fully mitigate project-related impacts, avoid the incidental take of burrowing owl, and minimize disturbance of the species' habitat will need to be prepared for approval by CDFW prior to commencing project activities.

Please do not hesitate to contact Travis McGill at (909) 816-1646 or [travismcgill@elmtconsulting.com](mailto:travismcgill@elmtconsulting.com) should you have any questions.

Sincerely,



Travis J. McGill  
Director