



ENVIRONMENTAL CONSULTANTS

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January 10, 2024

Yaret Salas
San Luis Concrete
2130 West Highland Avenue
San Bernardino, California 92407

Submitted via email: yaret@sanluisconcrete.com

**Re: Preconstruction Survey Report for the Hesperia-Primrose Land Development Project,
Hesperia, California**

Dear Yaret Salas:

This memorandum summarizes the results of the preconstruction survey conducted by SWCA Environmental Consultants (SWCA) for the Hesperia-Primrose Land Development Project (project). The project is located on the southwest corner of Yucca Street and Primrose Avenue in Hesperia, San Bernardino County, California. San Luis Concrete retained SWCA to determine the potential for the project to have a significant effect on biological resources, including western Joshua tree (*Yucca brevifolia*).

Project activities include the construction of a 36-unit apartment complex on an approximately 2.7-acre site within the city of Hesperia, California. The City of Hesperia provided a request for information letter in response to submittal of a project application. The letter states the need for "a written letter from a biologist, certified arborist, or registered botanist" confirming that there are "no Joshua Trees or any other protected plants on site." Based on a cursory view of existing aerial imagery, the site appeared to be cleared of all vegetation. However, western Joshua trees are present on neighboring parcels. Therefore, a site visit was performed to confirm the locations of western Joshua trees on adjacent parcels, and to determine the presence—or indicators of presence—of other special-status species.

Western Joshua trees were not found within 15 meters (50 feet) of the proposed project site; therefore, it is determined that there will not be incidental take of western Joshua trees due to project implementation, and a western Joshua tree Incidental Take Permit will not be required for the project. In addition, no other protected plants or special-status species or sign were observed within the project site.

Sincerely,

Shirley M. Innecken
Lead Natural Resources Project Manager

METHODS

Desktop Review

A desktop-based review was conducted to identify biological resources of interest near the project area. Species occurrences from the CDFW California Natural Diversity Database (CNDDDB) RareFind 5¹ and the California Native Plant Society's (CNPS's) Rare Plant Inventory², and U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) species list³ were queried for data relevant to the project to determine which special-status plant and wildlife species required analysis. The data search centered on six USGS 7.5-minute quadrangles surrounding the project area: Hesperia (site), Apple Valley South, Apple Valley North, Victorville, Adelanto, Baldy Mesa. Southern quadrangles Cajon, Silverwood Lake, and Lake Arrowhead were excluded from the desktop review due to mountainous habitat.

Potential for occurrence of special-status species within the project area and the immediate vicinity was assessed following the database searches. During the pre-field desktop assessment, each species was assigned to one of the categories listed below:

- **High Potential:** The species has been documented in the vicinity (within 5 miles of the project area based on recent [within 20 years] CNDDDB or other records or based on professional expertise specific to the area or species), and there is suitable habitat within the project area that makes the probability of the species occurring there high. Alternatively, there is high-quality suitable habitat within the project area and within the known range of the species. Bird species in this category were differentiated based on their occurrence within the project area as breeding, foraging only, and/or transients.
- **Moderate Potential:** Species is known to occur within the project area (based on non-historic [within 40 years] CNDDDB or other records or based on professional expertise specific to the area or species), and there is moderate quality habitat at the project area that makes the probability of the species occurring there moderate. Alternatively, there is moderate-quality habitat in the part of the project area that falls within the known range of the species.
- **Low Potential:** The project area is within the species' currently known range, but vegetation communities, soils, etc., do not resemble those known to be used by the species; or conditions appear suitable, but the project area is beyond the species' currently known range; or the species was recorded more than 40 years ago within the project area.
- **Absent:** There is no suitable habitat for the species within the project area, or the area is located well outside the known range of the species.

Preconstruction Survey

SWCA Environmental Consultants (SWCA) biologist Bridget Manjarrez conducted a preconstruction survey of the Hesperia-Primrose Land Development Project (project) site on December 23, 2023. The project is located on the southwest corner of Yucca Street and Primrose Avenue in Hesperia, San Bernardino County, California (Figures 1 and 2). The survey was performed between 12:00 p.m. and 12:30 p.m. Weather conditions during the survey were moderate with a temperature of 54 degrees

¹ California Department of Fish and Wildlife. 2023. California Natural Diversity Database (CNDDDB). Electronic database managed by the Natural Diversity Data Base, Wildlife Data and Habitat Analysis Branch, California Department of Fish and Wildlife. Sacramento, California. Available at: <https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>. Accessed December 2023.

² California National Plant Society. 2023. Rare Plant Inventory (online edition). California Native Plant Society. Sacramento, California. Available at: <http://www.rareplants.cnps.org/>. Accessed December 2023.

³ U.S. Fish and Wildlife Service. 2023. Information for Planning and Consultation (IPaC). Available at: <http://ecos.fws.gov/ipac/>. Accessed December 2023.

Fahrenheit, wind speed of 0 to 5 miles per hour, and 65% cloud cover. The survey area consisted of the proposed project site and a 50-foot buffer around the project site (see Figure 2). The survey was conducted on foot and in accordance with the requirements detailed in California Department of Fish and Wildlife's Fish and Game Code section 1927.3, subdivision (a)(1) "Census Instructions."⁴ The biologist searched for western Joshua tree (*Yucca brevifolia*) potential habitat or any indicators of special-status species such as old nests, scat, and burrows. Wildlife observations and sign were photographed and recorded using a GPS unit with submeter accuracy.

RESULTS

Based on the results of the literature and database review, 26 special-status wildlife species and 20 special-status plant species were found to have occurrences within the literature and records query area. Western Joshua tree, desert kit fox (*Vulpes macrotis arsipus*), and American badger (*Taxidea taxus*) are not tracked in CNDDB or IPac, however, are widespread in the Mojave Desert and were included in the review. Three special-status wildlife species were determined to have moderate potential based on quality of habitat, and the survey area falling within the known range for these species. These species include desert kit fox, American badger, and burrowing owl (*Athene cunicularia*). The remaining 23 special-status wildlife species were determined absent from the survey area due to lack of suitable habitat. 19 special-status plant species were determined absent from the survey area due to lack of suitable habitat, or the survey area is not within the known range for the species. Western Joshua tree was determined to have moderate potential within the survey area due quality of habitat and falling within the known range of this species.

Preconstruction Survey Results

The project site is within a previously disturbed area within a residential area and is best described in A Manual of California Vegetation as disturbed habitat.⁵ The dominant plant species in the survey area is common mustard (*Brassica juncea*), with redstem filaree (*Erodium cicutarium*), bristly fiddleneck (*Amsinckia tessellate*), and tumbleweed (*Amaranthus albus*). Trash was observed on-site. Photographs of the project site are provided in Appendix A (Photographs A-1 through A-5).

The habitat within the survey area is generally suitable for western Joshua tree, which prefers open habitat with sparse vegetation, and sandy or gravelly soils. However, no western Joshua trees were found during the survey. An unknown small mammal burrow and unknown canine dig were present in the southeast and south-central portions of the survey area, respectively, and were not able to be identified further due to lack of scat and tracks (Figure 3). Based on the size, depth, and lack of diagnostic features in the burrows, it was concluded that they do not belong to special-status species such as burrowing owl, desert kit fox, or American badger. Common raven (*Corvus corax*) was observed on-site. No protected plants or other special-status species or their sign were observed during the surveys. No other wildlife was observed in the survey area.

SUMMARY

SWCA conducted a preconstruction survey for western Joshua tree in December 2023. No western Joshua trees, protected plants, or other special-status species were observed. Proposed work activities are not anticipated to impact western Joshua tree or any other special-status species.

⁴ California Department of Fish and Wildlife. 2023. Census Instructions. Habitat Conservation Planning Branch. Sacramento, California. Available at: <https://wildlife.ca.gov/Conservation/Environmental-Review/WJT/Permitting/Census-Instructions>. Accessed December 2023.

⁵ California Native Plant Society. 2023. A Manual of California Vegetation Online. California Native Plant Society. Sacramento, California. Available at: <https://vegetation.cnps.org/>. Accessed December 2023.

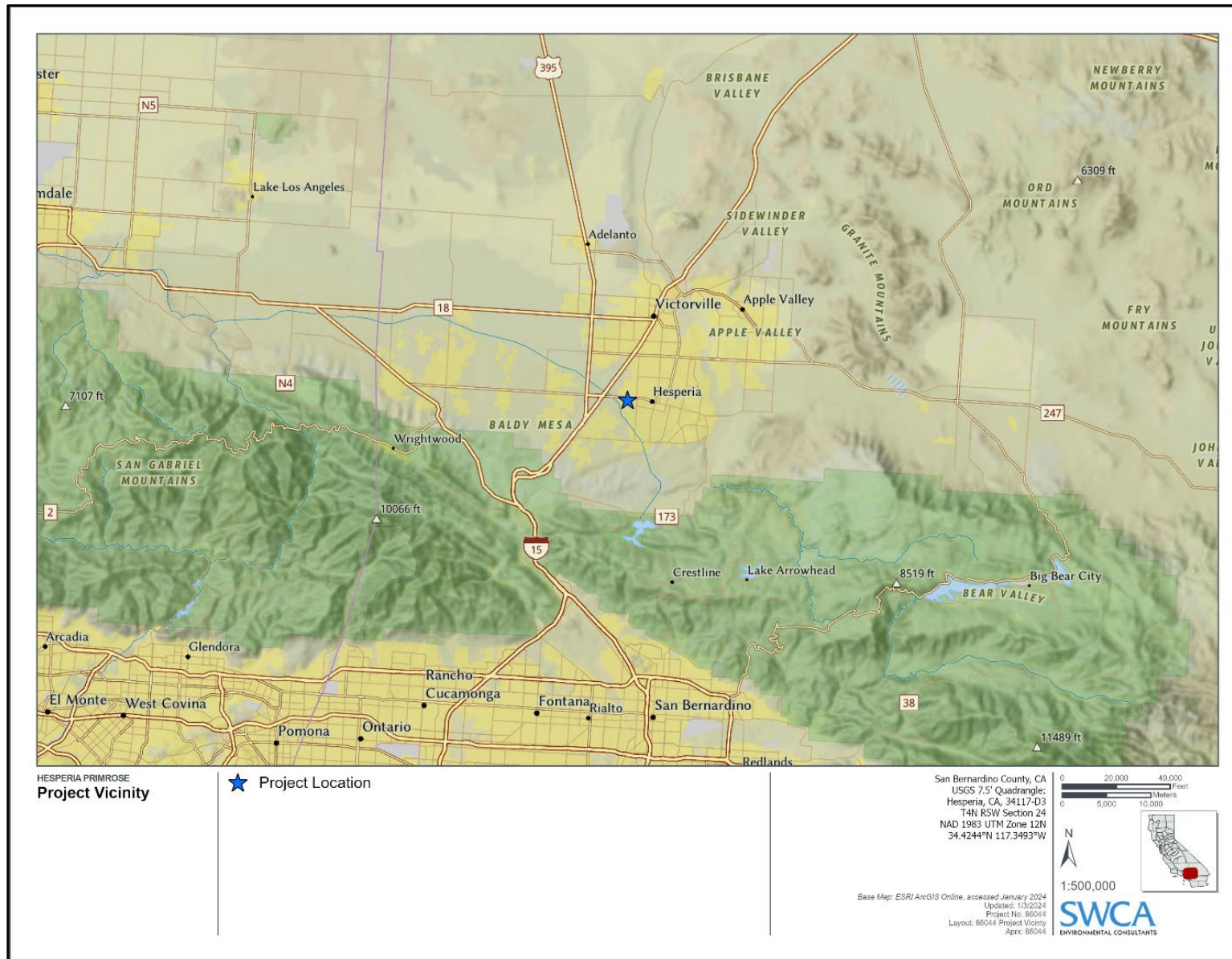


Figure 1. Project vicinity.

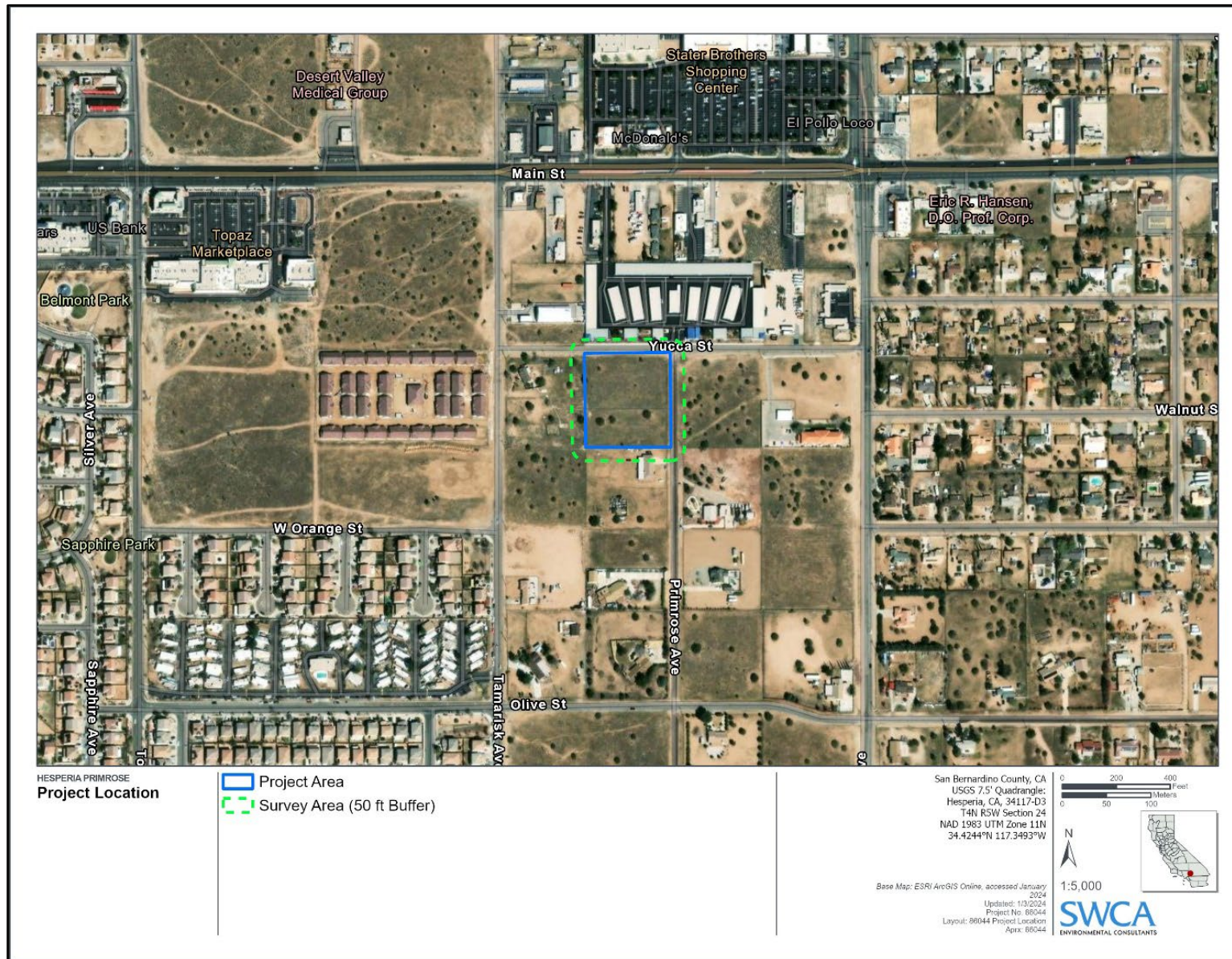


Figure 2. Project area and survey area with aerial background.

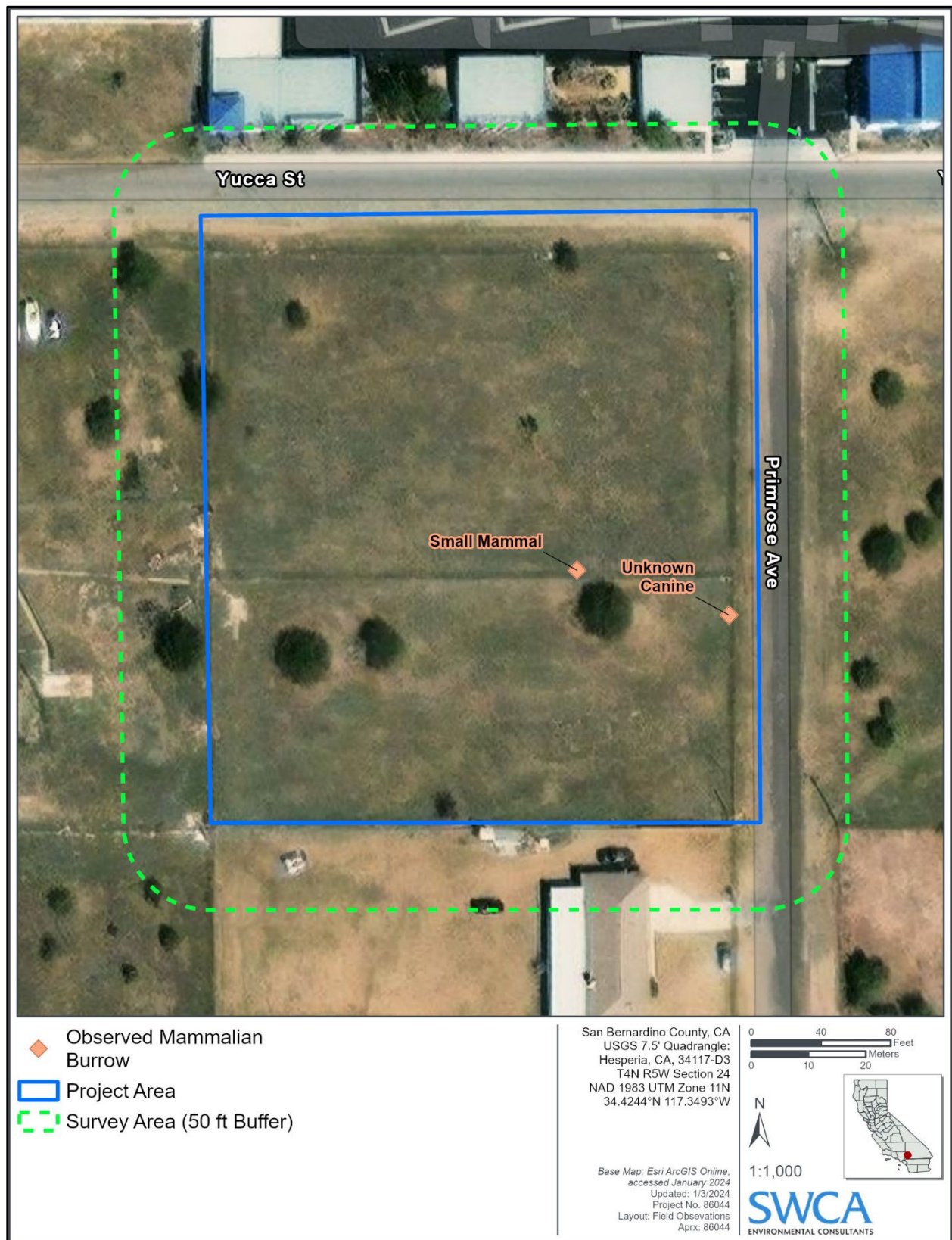


Figure 3. Observed burrows in the survey area.

APPENDIX A

Site Photographs



**Photograph A-1. Southern portion of the survey area; view facing north.
Photographed December 23, 2023.**



**Photograph A-2. Southwestern portion of the survey area; view facing
northeast. Photographed December 23, 2023.**



Photograph A-3. South portion of the survey area; view facing northwest, with evidence of trash on-site. Photographed December 23, 2023.



Photograph A-4. Unknown canine dig on-site. Photographed December 23, 2023.



Photograph A-5. Unknown small mammal burrow on-site. Photographed December 23, 2023.