DRAFT WESTERN RIVERSIDE COUNTY MULTIPLE SPECIES HABITAT CONSERVATION PLAN CONSISTENCY ANALYSIS AND BIOLOGY REPORT

MORENO VALLEY PUBLIC STORAGE PROJECT

MSHCP PERMITTEE:

CITY OF MORENO VALLEY

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LSA Project No. 20241908

LSA

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EXECUTIVE SUMMARY

LSA was retained by Cherry Miao to conduct a Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis and general biological study of the approximately 3-acre Moreno Valley Storage Project (project) site located along Indian Street, north of Alessandro Boulevard, in Moreno Valley, Riverside County, California. The study was conducted to address compliance with the MSHCP and the California Environmental Quality Act. Results of the MSHCP consistency analysis and general biological study are summarized below.

The project site is not within the MSHCP Criteria Area.

The site does not contain riverine/riparian areas or vernal pools as defined in the MSHCP and does not contain any fairy shrimp habitat. Therefore, focused surveys will not be required for sensitive riparian bird or fairy shrimp species.

The project site is not within the MSHCP survey area for burrowing owl (BUOW; *Athene cunicularia hypugaea*) and a BUOW burrow search found no suitable burrows for BUOW. Therefore, a preconstruction survey will not be required.

The project site is not located within an MSHCP designated survey area for any other species and does not contain Delhi series soils suitable for the Delhi sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*) or habitat for the California gnatcatcher (*Polioptila californica californica*). Therefore, no surveys for other species will be required.

The project will not be subject to MSHCP Urban/Wildlands interface requirements because the site is not within or adjacent to an identified Conservation Area.

The project site does not contain habitat for any threatened or endangered species. No substantial project impacts to other special-interest species are expected.

The project site provides habitat for nesting birds. A preconstruction nesting bird survey will be required prior to construction during the active nesting bird season (January 1 through August 31) and is not required outside of those dates.

No drainage features, ponded areas, or riparian habitat potentially subject to jurisdiction by the California Department of Fish and Wildlife, United States Army Corps of Engineers, or Regional Water Quality Control Board were found within the project site.

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APPENDICES

LIST OF ABBREVIATIONS AND ACRONYMS

APN	Assessor's Parcel Number
BUOW	burrowing owl
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
HCP	Habitat Conservation Plan
LBVI	least Bell's vireo
MSHCP	Multiple Species Habitat Conservation Plan
NEPSSA	Narrow Endemic Plant Species Survey Area
NRCS	National Resources Conservation Service
PQP	Public/Quasi-Public
Project	Moreno Valley Storage Project
RV	recreational vehicle
sf	square foot/feet
SKR	Stephens' Kangaroo Rat
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SWFL	southwestern willow flycatcher
USFWS	United States Fish and Wildlife Service
YBCU	yellow-billed cuckoo

1.0 INTRODUCTION

LSA was retained by Cherry Maio to conduct a Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis and general biological study of the approximately 3-acre Moreno Valley Storage Project (project) site (Assessor's Parcel Number [APN] 482-190-022), located near the corner of Indian Street and Alessandro Boulevard in Moreno Valley, Riverside County, California (see Appendix A, Figure 1; all figures are provided in Appendix A). The study was conducted to address the project's consistency with the goals and objectives of the MSHCP and compliance with the California Environmental Quality Act (CEQA).

The study included a site visit on October 30, 2024, by LSA biologist Chrissy Kent.

1.1 PROJECT DESCRIPTION AND AREA

The proposed project would develop a three-story, 132,003-square-foot (sf) self-storage building and 52 recreational vehicle (RV) storage spaces. Vehicular access to the proposed project will be provided along Indian Street via an existing driveway that is shared with the commercial uses south of the site (see Appendix A, Figure 2).

1.2 GENERAL SETTING

The approximately 3-acre project site (APN 482-190-022) is currently undeveloped. The site is bounded by commercial self-storage uses to the north, commercial uses (gas station and auto parts store) to the south, residential uses to the east, and Indian Street and commercial uses to the west. The site is relatively flat at an elevation of approximately 1,583 feet above mean sea level. The mapped soils on the site are Handford coarse sandy loam, 0 to 2 percent slopes and Greenfield sandy loam, 0 to 2 percent slopes (NRCS n.d.) (see Appendix A, Figure 3). Undeveloped soils observed on the project site appear to be consistent with these designations.

2.0 RESERVE ASSEMBLY ANALYSIS

2.1 CELL AND CRITERIA ANALYSIS

The MSHCP provides for the assembly of a Conservation Area consisting of Core Areas and Linkages for the conservation of covered species. The Conservation Area is to be assembled from portions of the MSHCP Criteria Area, which consist of quarter-section (i.e., approximately 160-acre) Criteria Cells, each with specific criteria for the species conservation within that cell.

The project site is not within an MSHCP Conservation Area; therefore, no reserve assembly analysis is required.

2.2 PUBLIC/QUASI-PUBLIC LANDS ANALYSIS

The MSHCP provides for the assembly of a Conservation Area consisting of existing lands known to be in public/private ownership (also known as Public/Quasi-Public, or PQP, lands) and expected to be managed for open space value and/or in a manner that contributes to the conservation of Covered Species (including lands contained in existing reserves). As such, projects within and adjacent to PQP lands require an analysis of effects to PQP lands.

The project site is not within or adjacent to PQP lands; therefore, no PQP lands analysis is required.

3.0 VEGETATION AND SPECIES COMPENDIA

The project site is vegetated by ruderal/non-native annual grassland species (see Appendix A, Figure 4). Dominant plant species identified include vinegar weed (*Trichostema lanceolatum*), flatspine bur ragweed (*Ambrosia acanthicarpa*), Bermuda grass (*Cynodon dactylon**), and slender wild oat (*Avena barbata**). A complete list of plant species observed on the site is included in Appendix B.

Native trees onsite are limited to a single Goodding's willow (*Salix gooddingii*), located along the southern portion of the project. Non-native trees are located within the eastern project boundary, which consists of three Mexican fan palm (*Washingtonia robusta*) seedlings. The Goodding's willow located within the project site is expected to have at least a four-inch caliper, therefore, compliance with the City of Moreno Valley Municipal Code Chapter 9.17 (Landscape and Water Efficiency Requirements) is required.

Wildlife species observed were house sparrow (*Passer domesticus*), yellow-rumped warbler (*Setophaga coronata*), and house finch (*Haemorhous mexicanus*).

4.0 PROTECTION OF SPECIES ASSOCIATED WITH RIPARIAN/RIVERINE AREAS AND VERNAL POOLS (MSHCP SECTION 6.1.2)

Section 6.1.2 of the MSHCP requires assessment of impacts to riparian habitats, riverine areas, and vernal pools, including focused surveys for sensitive riparian bird and fairy shrimp species when suitable habitat is present. The intent of the assessment requirement is to provide for the protection of resources used by MSHCP-covered species, as well as existing and future downstream conservation areas. Riverine/riparian areas and vernal pools are defined in Section 6.1.2 of the MSHCP as follows:

> Riparian/Riverine Areas are lands which contain Habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year.
>
> Vernal pools are seasonal wetlands that occur in depression areas that have wetlands indicators of all three parameters (soils, vegetation and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portion of the growing season. Obligate hydrophytes and facultative wetlands plant species are normally dominant during the wetter portion of the growing season, while upland species (annuals) may be dominant during the drier portion of the growing season. The determination that an area exhibits vernal pool characteristics, and the definition of the watershed supporting vernal pool hydrology, must be made on a case-by-case basis. Such determinations should consider the length of the time the area exhibits upland and wetland characteristics and the manner in which the area fits into the overall ecological system as a wetland. Evidence concerning the persistence of an area's wetness can be obtained from its history, vegetation, soils, and drainage characteristics, uses to which it has been subjected, and weather and hydrologic records.
>
> Fairy Shrimp. For Riverside, vernal pool and Santa Rosa fairy shrimp, mapping of stock ponds, ephemeral pools and other features shall also be undertaken as determined appropriate by a qualified biologist.
>
> With the exception of wetlands created for the purpose of providing wetlands Habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, areas demonstrating characteristics as described above which are artificially created are not included in these definitions.

4.1 RIPARIAN/RIVERINE

4.1.1 Methods

The project site was assessed for riparian/riverine areas at the time of the October 30, 2024, site visit. The assessment included identification and mapping of plant communities on the site as well as any drainage features.

4.1.2 Existing Conditions and Results

There are no drainage features or riparian vegetation on the project site; therefore, there are no areas that would meet the MSHCP definition of riparian/riverine areas.

4.2 VERNAL POOLS

4.2.1 Methods

The project site was assessed for vernal pools at the time of the October 30, 2024, site visit. The assessment included a search for depressions, indicators of wetland hydrology, suitable soils, and hydrophytic vegetation. The assessment also included a review of seasonally appropriate aerial photographs (Google Earth: 10/2016, 3/2017, 12/2018, 8/2019, 4/2020, 1/2021, 8/2021, 1/2023, 3/2023, and 2/2024.)

4.2.2 Existing Conditions and Results

No ponded areas or features resembling vernal pools were observed on site or seen in aerial photographs as a result of previous development. The soils mapped and observed on the site are sandy loams, which are unlikely to support ponding sufficient for vernal pool formation. There are no areas of hydrophytic vegetation on the site. Therefore, there are no vernal pools.

4.3 FAIRY SHRIMP

4.3.1 Methods

The project site was assessed for fairy shrimp habitat at the same time and using the same methods as the assessment for vernal pools. The MSHCP calls for habitat assessments for three sensitive species of fairy shrimp: Santa Rosa Plateau fairy shrimp (*Linderiella santarosae*), Riverside fairy shrimp (*Streptocephalus woottoni*), and vernal pool fairy shrimp (*Branchinecta lynchi*). Santa Rosa Plateau fairy shrimp occurs only on the Santa Rosa Plateau of extreme southwest Riverside County. A fourth sensitive species of Southern California, San Diego fairy shrimp (*Branchinecta sandiegonensis*), is found primarily in coastal areas of Orange and San Diego Counties. It has been found as far inland as the Wildomar area of southwest Riverside County, but it is not expected in the project area. These sensitive fairy shrimp species inhabit vernal pools as well as stock ponds, large road ruts, or other similar habitats that pond water long enough to allow growth and reproduction. To provide fairy shrimp habitat, a feature must regularly pond water for at least 18 days for vernal pool fairy shrimp (Eriksen and Belk 1999) and 2 months for Riverside fairy shrimp (USFWS 2012).

4.3.2 Existing Conditions and Results

As noted above, there are no vernal pools on the project site. Due to the developed nature of the project site and soil conditions, the project site does not provide fairy shrimp habitat.

4.4 RIPARIAN BIRDS

4.4.1 Methods

Habitat suitability for riparian birds, including least Bell's vireo (LBVI; *Vireo bellii pusillus*), southwestern willow flycatcher (SWFL; *Empidonax traillii extimus*), and yellow-billed cuckoo (YBCU; *Coccyzus americanus*), was assessed in conjunction with the assessment for riverine/riparian areas.

4.4.2 Existing Conditions and Results

There are no riparian/riverine areas or any habitat suitable for riparian birds on the project site. Therefore, no surveys for riparian birds will be required.

4.5 OTHER MSHCP SECTION 6.1.2 SPECIES

Due to the lack of riparian/riverine and vernal pool resources on or adjacent to the project site, the project site does not provide habitat for other MSHCP Section 6.1.2 species.

5.0 PROTECTION OF NARROW ENDEMIC PLANT SPECIES (MSHCP SECTION 6.1.3)

Section 6.1.3 of the MSHCP requires focused surveys for specified sensitive plant species if the project is located within a Narrow Endemic Plant Species Survey Area (NEPSSA) and suitable habitat is present. The project is not within a mapped survey area for NEPSSA species.

6.0 ADDITIONAL SURVEY NEEDS AND PROCEDURES (MSHCP SECTION 6.3.2)

MSHCP Section 6.3.2 requires surveys for additional plants, amphibians, small mammals, and burrowing owl (*Athene cunicularia hypugaea*) for projects located within mapped survey areas.

6.1 CRITERIA AREA PLANT SPECIES

The project is not within a mapped survey area for Criteria Area Species Survey Area plant species.

6.2 AMPHIBIANS

The project is not within a mapped survey area for amphibian species.

6.3 BURROWING OWL

Burrowing owls are found in open, dry grasslands, agricultural and range lands, and desert habitats often associated with burrowing animals. They can also inhabit grass, forb, and shrub stages of pinyon and ponderosa pine habitats. They nest in abandoned burrows of ground squirrels or other animals, in pipes, under piles of rock or debris, and in other similar features.

6.3.1 Methods

Habitat suitability for burrowing owl (BUOW) was assessed at the time of the October 30, 2024, site visit. The assessment included an evaluation of soil texture, vegetative cover, topography, and the presence of mammal burrows, rock piles, or other areas suitable for nest construction.

6.3.2 Existing Conditions and Results

The site is an undeveloped lot with signs of disturbance. The site is surrounded by vastly developed land that contains utility poles that provide roosting spots for hawks and large owls that could prey upon BUOW. No burrows suitable for burrowing owl were found. Because of the limited habitat (ruderal/non-native grassland vegetation), lack of burrows or similar features suitable for BUOW occupation, and presence of roosting habitat for birds of prey, BUOW is not likely to occur on the project site and is considered absent. Furthermore, due to lack of suitable habitat, the surrounding vicinity is unlikely to support burrowing owl.

6.3.3 Impacts and Mitigation

No impacts to BUOW are anticipated due to lack of suitable habitat and due to the site having habitat that is suitable to support species that may prey on burrowing owl. Additionally, no suitable burrowing owl burrows were observed within the project site during the field survey. Therefore, no focused surveys for BUOW are required.

6.4 MAMMALS

The project is not within a mapped survey area for mammals.

7.0 INFORMATION ON OTHER SPECIES

7.1 DELHI SANDS FLOWER-LOVING FLY

The MSHCP requires surveys for Delhi sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*) in most areas of mapped Delhi series soils where suitable habitat exists (MSHCP Section 9).

The project site is not within an area of mapped Delhi soils, and (as noted in Section 1.0, above) soil observed throughout the site is sandy loam, which is inconsistent with Delhi soils; therefore, no survey or additional analysis is required for this species.

7.2 COASTAL CALIFORNIA GNATCATCHER

Permittees are required (per the USFWS Special Terms and Conditions for Permit TE-088609-0) to avoid clearing California gnatcatcher (*Polioptila californica californica*) occupied habitat in the Criteria Area and in PQP lands between March 1 and August 15.

The project site does not provide suitable coastal sage scrub habitat for the Coastal California gnatcatcher and is not within the Criteria Area or PQP lands.

7.3 SPECIES NOT ADEQUATELY CONSERVED

Some species that will eventually have full coverage under the MSHCP are not considered adequately conserved until requirements indicated in Table 9-3 of MSHCP Section 9 are met.

7.3.1 Methods

A literature review was conducted to investigate the potential occurrence of special-status species on the project site or in the vicinity. Database records for the *Sunnymead*, *Riverside East*, *Steele Peak*, and *Perris, California* United States Geological Survey 7.5-minute quadrangles were searched on October 29, 2024, using the CDFW Natural Diversity Database application Rarefind 5 (CDFW n.d.).

7.3.2 Existing Results

None of the species lacking full coverage (see Section 11.3, Table A) have been reported from the project site, and none were observed during the site visit. Given the habitat quality, none of these species have more than a low potential of being present.

8.0 GUIDELINES PERTAINING TO THE URBAN/WILDLANDS INTERFACE (MSHCP SECTION 6.1.4)

To preserve the integrity of areas described as existing or future MSHCP Conservation Areas, the guidelines contained in MSHCP Section 6.1.4 (Urban Wildlands Interface Guidelines) are to be implemented for projects that are located adjacent to either existing conservation or land described for conservation in the MSHCP Criteria Area.

The project site is not located adjacent to conserved lands or lands in the Criteria Area that are described for conservation. Therefore, the Urban Wildlands Interface Guidelines do not apply to this project.

9.0 POTENTIAL JURISDICTIONAL WATERS AND STREAMBEDS

No drainage features, ponded areas, or riparian habitat potentially subject to jurisdiction by the CDFW, United States Army Corps of Engineers, or Regional Water Quality Control Board were found within the project site.

10.0 NESTING BIRDS

The wood fencing and utility poles adjacent to the project site may be used by hawks, ravens, or other large birds for nesting from January 1 to August 31. Trees, shrubs, and other vegetation on and adjacent to the project site may provide nest sites for smaller birds, and burrowing owls may nest in ground squirrel burrows, pipes, or similar features. Most birds and their active nests are protected from "take" (meaning destruction, pursuit, possession, etc.) under the Migratory Bird Treaty Act and/or Sections 3503–3801 of the California Fish and Game Code. Activities that cause destruction of active nests, or that cause nest abandonment and subsequent death of eggs or young, may constitute violations of one or both of these laws.

Prior to construction activities, including vegetation removal, a preconstruction nesting bird survey will be conducted between January 1 to August 31 by a qualified biologist within 3 days of any construction activities or vegetation removal. Should nesting birds be found, an exclusionary buffer will be established by the qualified biologist. The buffer will be clearly marked in the field by construction personnel under the guidance of the qualified biologist. No construction activities will be allowed within this zone until the qualified biologist determines that the young have fledged, or the nest is no longer active.

11.0 CEQA COMPLIANCE

11.1 ADOPTED HABITAT CONSERVATION PLANS

Section 10(a)(2)(A) of the 1973 Federal Endangered Species Act requires the preparation of a habitat conservation plan (HCP) for incidental take of threatened or endangered species when there is no federal agency involvement in a project. Continuing land development may cause incidental take of listed species and, therefore, HCPs have been prepared for areas within western Riverside County. The MSHCP and the Stephens' Kangaroo Rat (SKR) (*Dipodomys stephensi*) HCP are the principal habitat conservation plans in western Riverside County. The USFWS regional office maintains a current list of habitat conservation plans for the Southern California region.

The project site is within the MSHCP area and within the SKR HCP fee area. Focused surveys for SKR will not be required for this project and a fee associated with the SKR HCP is required. The project site is not subject to any other adopted HCP.

11.2 THREATENED AND ENDANGERED SPECIES

The USFWS and CDFW may list species as threatened or endangered under the Federal and State Endangered Species Acts. The USFWS can designate critical habitat that identifies specific areas, either occupied or unoccupied, that are essential to the conservation of a listed species. Critical habitat areas may require special management considerations or protections. The USFWS and CDFW have issued permits for the take of most threatened and endangered species within the MSHCP Plan Area. The MSHCP covers impacts to these species. However, if a project has the involvement of a federal agency, that agency is required to address impacts to listed species and critical habitat by consulting with the USFWS. The USFWS has indicated in the permit issued for the MSHCP that, in such cases, the consultation will be expedited and that no restrictions will be imposed on the project beyond those specified in the MSHCP.

No threatened or endangered species are expected to occur on the project site.

11.3 OTHER SPECIAL-STATUS SPECIES

Other special-status species may occur on the proposed project site. The CDFW, USFWS, local agencies, and special interest groups, such as the California Native Plant Society, maintain lists of species that they consider to be in need of monitoring. Legal protection for special-status species varies widely.

The special-status species listed in Table A may be expected to occur in the general project vicinity but are not covered under the MSHCP or are not adequately conserved by the MSHCP at this time. Some of these species have a low potential of occurring on the project site. However, none of these species that may be present are listed as threatened or endangered under State or federal law, and the site does not contain high quality habitat for any of these species. Therefore, any impacts to these species by the project would not be substantial. Neither additional surveys nor additional conservation measures will be required by this project for these species.

Table A: Special-Status Species Potentially Occurring in the Project Vicinity That Are Not Adequately Covered by the MSHCP

Species	Status	Habitat and Distribution	Growth Form and Blooming Period	Occurrence Probability
Abronia villosa var. *aurita* **Chaparral sand-verbena**	US: – CA: 1B	Sandy areas (generally flats and benches along washes) in chaparral and coastal sage scrub, and improbably in desert dunes or other sandy areas, below 1,600 meters (5,300 feet) elevation. In California, reported from Riverside, San Diego, Imperial, Los Angeles, and Ventura Counties. Believed extirpated from Orange County. Also reported from Arizona and Mexico (Baja California). Plants reported from desert communities are likely misidentified.	Blooms mostly March through August (annual or perennial herb)	**Absent.** Project site lacks sandy areas on flats and benches along washes. Chaparral and coastal sage scrub habitat not present.
Chloropyron maritimum spp. *maritimum* **Salt marsh bird's-beak**	US: FE CA: SE/1B	Coastal dunes and salt marshes. In California, known from Los Angeles, Orange, Santa Barbara, San Bernardino, San Diego, San Luis Obispo, and Ventura Counties. Historical collections referred to this taxon from alkaline meadow in vicinity of San Bernardino Valley and from interior San Diego County are intermediate to *C. maritimus* ssp. *canescens*. Also occurs in Mexico.	Blooms May through October (annual herb)	**Absent.** Project site lacks coastal dunes and salt marshes.
Lepidium virginicum var. *robinsonii* **Robinson's pepper-grass**	US: – CA: 4	Dry soils in coastal sage scrub and chaparral below 885 meters (2,900 feet) elevation. In California, known only from Los Angeles, Orange, Riverside, Santa Barbara, San Bernardino and San Diego Counties, and Santa Cruz Island. Also occurs in Mexico.	Blooms January through July (annual herb)	**Absent.** Project site lacks dry soils in coastal sage scrub and chaparral.
Senecio aphanactis **Chaparral ragwort**	US: – CA: 2B	Openings (especially alkaline flats) in cismontane woodland, coastal sage scrub, and chaparral at 15 to 800 meters (50 to 2,600 feet) elevation. Known in California from Alameda, Contra Costa, Fresno, Los Angeles, Merced, Monterey, Orange, Riverside, Santa Barbara, Santa Clara, San Diego, San Luis Obispo, Solano, and Ventura Counties. Also occurs in Baja California.	Blooms January through April (annual herb)	**Absent.** Project site lacks cismontane woodland, coastal sage scrub, and chaparral habitat.

Table A: Special-Status Species Potentially Occurring in the Project Vicinity That Are Not Adequately Covered by the MSHCP

Species	Status	Habitat and Distribution	Growth Form and Blooming Period	Occurrence Probability
Symphyotrichum defoliatum **San Bernardino aster**	US: – CA: 1B	Vernally wet sites (such as ditches, streams, and springs) in many plant communities below 2,040 meters (6,700 feet) elevation. In California, known from Ventura, Kern, San Bernardino, Los Angeles, Orange, Riverside, and San Diego Counties. May also occur in San Luis Obispo County. In the western Riverside County area, this species is scarce and documented only from Temescal and San Timoteo Canyons (*The Vascular Plants of Western Riverside County, California*. F.M. Roberts et al., 2004).	Blooms July through November (perennial herb)	**Absent.** Project site lacks a water source.
Accipiter cooperii (nesting) **Cooper's hawk**	US: – CA: SA	Forages in a wide range of habitats, but primarily in forests and woodlands. These include natural areas as well as human-created habitats such as plantations and ornamental trees in urban landscapes. Usually nests in tall trees (20 to 60 feet) in extensive forested areas (generally woodlots of 4 to 8 hectares with canopy closure of greater than 60 percent). Occasionally nests in isolated trees in more open areas.	Year-round	**Absent.** No suitable nesting habitat (forests and woodlands).
Bombus crotchii **Crotch's bumble bee**	US: – CA: SCE	Inhabits open scrub (including chaparral) and grassland from coastal California to crest of Sierra-Cascade and in desert edge areas, south into Mexico. Primarily nests underground. Suitable bumble bee habitat requires the continuous availability of flowers on which to forage throughout the duration of the colony (spring through fall), colony nest sites, and overwintering sites for the queens.	Spring and summer	**Low.** No scrub habitat present. Project largely consists of non-native grasslands, but is often disturbed resulting in the destruction or removal of vegetation as seen in aerial photographs throughout the years. Therefore, no suitable flower availability is present to support a colony.

Table A: Special-Status Species Potentially Occurring in the Project Vicinity That Are Not Adequately Covered by the MSHCP

Species	Status	Habitat and Distribution	Growth Form and Blooming Period	Occurrence Probability
Bombus pensylvanicus **American bumble bee**	US: – CA: SA	Inhabits open farmland and fields throughout the U.S. Also occurs in Canada and Mexico. Primarily nests at the ground surface in tall grass, but occasionally underground. Suitable bumble bee habitat requires the continuous availability of flowers on which to forage throughout the duration of the colony (spring through fall), colony nest sites, and overwintering sites for the queens.	Spring and summer	**Absent.** Grassland vegetation is limited, and the site does not contain sufficient flower resources to support a colony.
Anniella stebbinsi **Southern California legless lizard**	US: – CA: SSC	Inhabits sandy or loose loamy soils with high moisture content under sparse vegetation in Southern California.	Nearly year-round, at least in southern areas	**Absent.** Although loamy soils are present, this species is considered absent based on the high level of disturbance and surrounding development.
Arizona elegans occidentalis **California glossy snake**	US: – CA: SSC	Scrub and grassland habitats, often with loose or sandy soils. Patchily distributed from the eastern portion of San Francisco Bay to southern San Joaquin Valley and in non-desert areas of Southern California. Also occurs in Baja California, Mexico.	Most active March through June (nocturnal)	**Absent.** No suitable soils and although grasslands are present, this species is considered absent based on the high level of disturbance and surrounding development.
Diadophis punctatus modestus **San Bernardino ringneck snake**	US: – CA: SA	Under surface objects along drainage courses, preferring mesic chaparral and oak and walnut woodland communities. Moist habitats of southwestern California from about Ventura to Orange Counties.	Diurnal. Crepuscular and nocturnal during warmer periods.	**Absent.** Project site lacks drainage and favorable habitat (mesic chapparal, oak, and walnut communities).
Salvadora hexalepis virgultea **Coast patch-nosed snake**	US: – CA: SSC	Coastal chaparral, washes, sandy flats and rocky areas. Widely distributed throughout lowlands, up to 2,130 meters (7,000 feet) elevation, of Southern California from coast to the eastern border.	Active diurnally throughout most of the year	**Absent.** Project site lacks coastal chaparral, washes, sandy flats, and rocky areas.

Table A: Special-Status Species Potentially Occurring in the Project Vicinity That Are Not Adequately Covered by the MSHCP

Species	Status	Habitat and Distribution	Growth Form and Blooming Period	Occurrence Probability
Asio otus (nesting) **Long-eared owl**	US: – CA: SSC	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.	Nocturnal; year-round	**Absent.** No suitable habitat (forests and woodlands).
Laterallus jamaicensis coturniculus **California black rail**	US: – CA: ST/CFP	Requires shallow water in salt marshes, freshwater marshes, wet meadows, or flooded grassy vegetation. Prefers areas of moist soil vegetated by fine-stemmed emergent plants, rushes, grasses, or sedges, with scattered small pools. Known from coastal California, northwestern Baja California, the lower Imperial Valley, and the lower Colorado River of Arizona and California. Now extirpated from virtually all of coastal Southern California.	Year-round	**Absent.** Project site lacks a water source.
Spinus lawrencei (=*Carduelis l.*) (nesting) **Lawrence's goldfinch**	US: – CA: SA	Usually inhabits oak woodlands, but also uses chaparral, riparian woodlands, coastal scrub, forests, pinyon-juniper woodlands, plantings of cypress, cedars, or junipers, tall weedy and adjacent rural residential areas. A water source such as a stream, small lake, or farm pond within 0.5 kilometer is probably required. Nests throughout much of the non-desert portion of California and Baja California.	Fairly common April through August; otherwise, uncommon	**Absent.** Project site lacks forests, cypress, cedar, oak, riparian, or pinyon-juniper woodland. Surrounding lands are also vastly developed.
Ceratochrysis longimala **Desert cuckoo wasp**	US: – CA: SA	Habitat requirements unknown. Known from the Gorman area (Los Angeles County), where it is presumed to persist. Also known from a historical record (1915, old part of Riverside) from Riverside County.	Unknown	**Absent.** Not expected due to the high level of disturbance and previous development.
Eugnosta busckana **Busck's gallmoth**	US: – CA: SA	Larval host reported as *Encelia californica* (*HOSTS - a Database of the World's Lepidopteran Host plants*. The Natural History Museum, London, 2007). Other habitat requirements unknown. Species is known only from historical reports.	Unknown	**Absent.** The host plant does not occur. This species is not expected due to the high level of disturbance and previous development.

Table A: Special-Status Species Potentially Occurring in the Project Vicinity That Are Not Adequately Covered by the MSHCP

Species	Status	Habitat and Distribution	Growth Form and Blooming Period	Occurrence Probability
Eumops perotis californicus **Western mastiff bat**	US: – CA: SSC	Occurs in many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral, etc.; roosts in crevices in vertical cliff faces, high buildings, and tunnels, and travels widely when foraging.	Year-round; nocturnal	**Low.** Project site lacks semi-arid to arid habitats such as conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral habitat. However, site may be used during foraging activities.
Lasiurus xanthinus **Western yellow bat**	US: – CA: SSC	Found mostly in desert and desert riparian areas of the southwest U.S., but also expanding its range with the increased usage of native and non-native ornamental palms in landscaping. Individuals typically roost amid dead fronds of palms in desert oasis but have also been documented roosting in cottonwood trees. Forages over many habitats.	Year-round; nocturnal	**Low.** No roosting habitat. Palms observed on site are roughly 4 feet tall and not suitable for roosting. May use the site during foraging activities.
Nyctinomops femorosaccus **Pocketed free-tailed bat**	US: – CA: SSC	Usually associated with cliffs, rock outcrops, or slopes. May roost in buildings (including roof tiles) or caves. Rare in California, where it is found in Riverside, San Diego, Imperial, and possibly Los Angeles Counties. More common in Mexico.	Year-round; nocturnal	**Low.** Project site lacks cliffs, rock outcrops, and slopes. Surrounding development may providing general roosting habitat.
Onychomys torridus ramona **Southern grasshopper mouse**	US: – CA: 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. More susceptible to small- and large-scale habitat loss and fragmentation than most other rodents, due to its low fecundity, low population density, and large home range size. Arid portions of southwestern California and northwestern Baja California.	Nocturnal, active year-round	**Absent.** No sandy or gravelly areas with friable soils on site; no suitable plant community on site.

Table A: Special-Status Species Potentially Occurring in the Project Vicinity That Are Not Adequately Covered by the MSHCP

Species	Status	Habitat and Distribution	Growth Form and Blooming Period	Occurrence Probability
Taxidea taxus **American badger**	US: – CA: SSC	Primary habitat requirements seem to be sufficient food and friable soils in relatively open uncultivated ground in grasslands, woodlands, and desert. Widely distributed in North America.	Year-round	**Absent.** No suitable burrows on site; habitat poor.

Source: Compiled by LSA (2024).

LEGEND

US: Federal Classifications

FE Listed as Endangered.

CA: State Classifications

SE State-listed as Endangered.

ST State-listed as Threatened.

SCE Candidate for State-listing as Endangered.

SSC Species of Special Concern. Refers to animals with vulnerable or seriously declining populations.

SA Special Animal. Refers to any other animal monitored by the Natural Diversity Database, regardless of its legal or rarity status.

LEGEND (Continued)

CFP California Fully Protected. Refers to animals protected from take under Fish and Game Code sections 3511, 4700, 5050, and 5515.

1A California Rare Plant Rank 1A – presumed extinct in California.

1B California Rare Plant Rank 1B – rare, threatened, or endangered in California and elsewhere.

2B California Rare Plant Rank 2 – rare, threatened, or endangered in California, but more common elsewhere.

4 California Rare Plant Rank 4 – a watch list of plants of limited distribution.

11.4 WILDLIFE MOVEMENT, CORRIDORS, AND NURSERY SITES

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

The project site has been previously developed and is located adjacent to Indian Street, which has a high volume of traffic, and is surrounded by existing development that already restricts wildlife movement in the project vicinity. The project is also not within an MSHCP designated linkage or corridor. The proposed project would not substantially limit wildlife movement.

In addition, due to the developed nature of the project site, it does not serve as a nursery site.

11.5 NATURAL COMMUNITIES OF INTEREST

Riparian habitats, oak woodlands, and vernal pools are among the natural communities of interest to the CDFW.

There are no riparian communities, vernal pools, or other sensitive plant communities on the project site.

11.6 WETLANDS

There are no wetlands on the project site.

11.7 LOCAL POLICIES AND ORDINANCES PROTECTING BIOLOGICAL RESOURCES

City of Moreno Valley and County of Riverside General Plans and development ordinances may include regulations or policies governing biological resources. For example, policies may include tree preservation, locally designated species survey areas, local species of interest, and significant ecological areas.

The project will need to abide by the City's Local Tree Ordinance since trees are present within the project site and therefore applicable.

11.8 INDIRECT EFFECTS

Indirect impacts to surrounding areas as a result of the project may include, but are not limited to, increased dust, noise, lighting, traffic, and storm water runoff. Because of the small scale of the project that was previously entirely developed, and its location within a landscape that is already highly disturbed or developed, substantial indirect impacts to sensitive biological resources are not anticipated.

11.9 CUMULATIVE EFFECTS

Project construction will contribute to a minimal loss of ruderal/non-native annual grassland in the region. Cumulative impacts potentially include habitat fragmentation, increased edge effects, reduced habitat quality, and increased wildlife mortality. The MSHCP provides a comprehensive approach to the regional conservation of these habitats and, as a regional plan, serves to provide mitigation for cumulative impacts to covered species. Project compliance and consistency with the MSHCP ensures that any cumulative impacts to covered species are effectively mitigated. Special-status species that are not covered by the MSHCP also benefit from the surveys, conservation, and other measures of the MSHCP because they occupy many of the same habitats.

12.0 REFERENCES

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Natural Resources Conservation Service (NRCS). n.d. Web Soil Survey (Version 3.4.0). United States Department of Agriculture. Website: https://websoilsurvey.sc.egov.usda.gov/ (accessed October 2024).

United States Fish and Wildlife Service (USFWS). 2012. Endangered and Threatened Wildlife and Plants; Revised Critical Habitat for the Riverside Fairy Shrimp; Final Rule. Federal Register 77: 72070-72140 (December 4, 2012).

13.0 CERTIFICATION STATEMENT

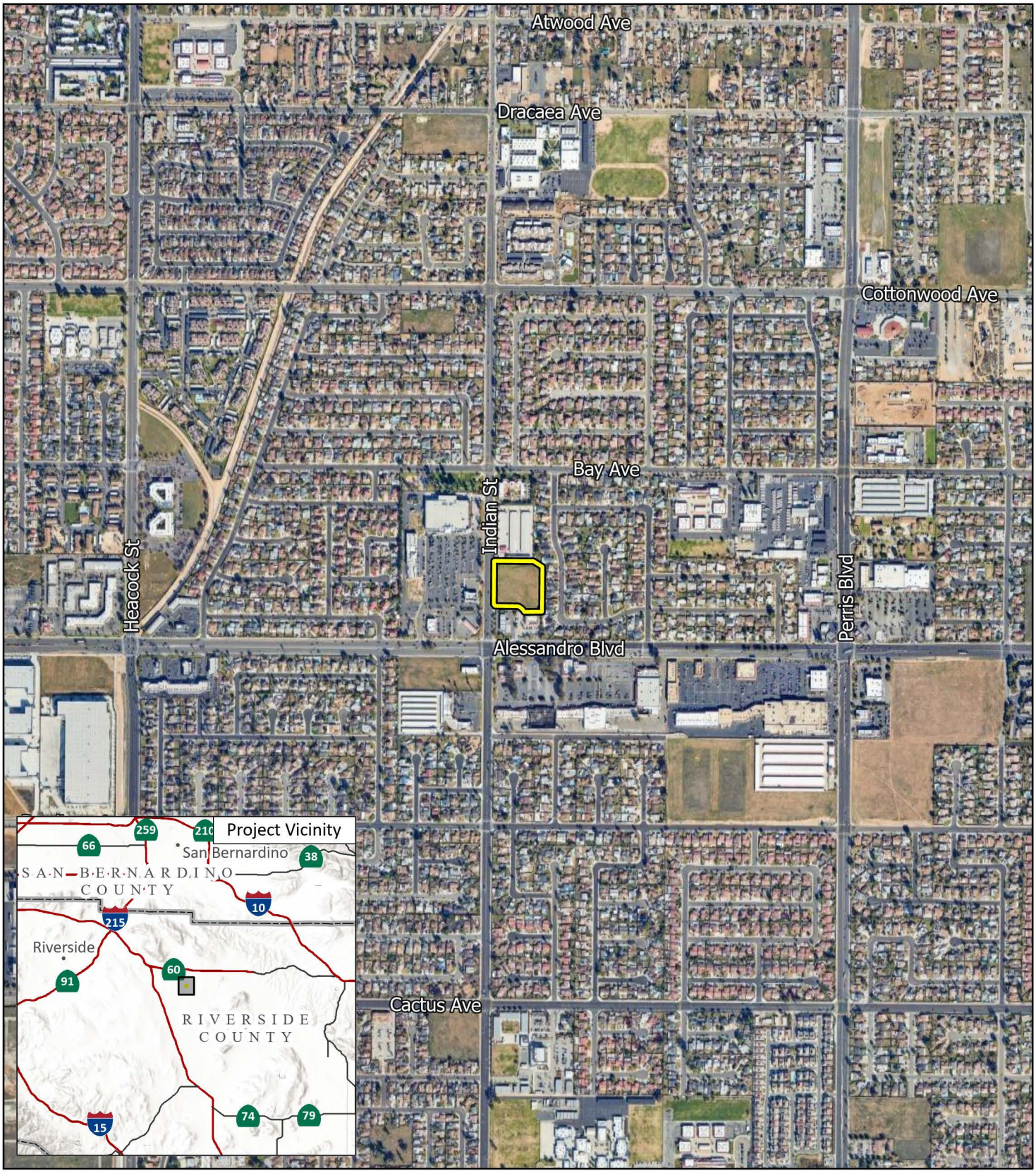
I hereby certify that the statements furnished in this report present the data and information required for this biological evaluation and the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Date: January 7, 2025 Signature: 

Chrissy Kent
Assistant Biologist

APPENDIX A

FIGURES



LSA

Project Location

FIGURE 1

N

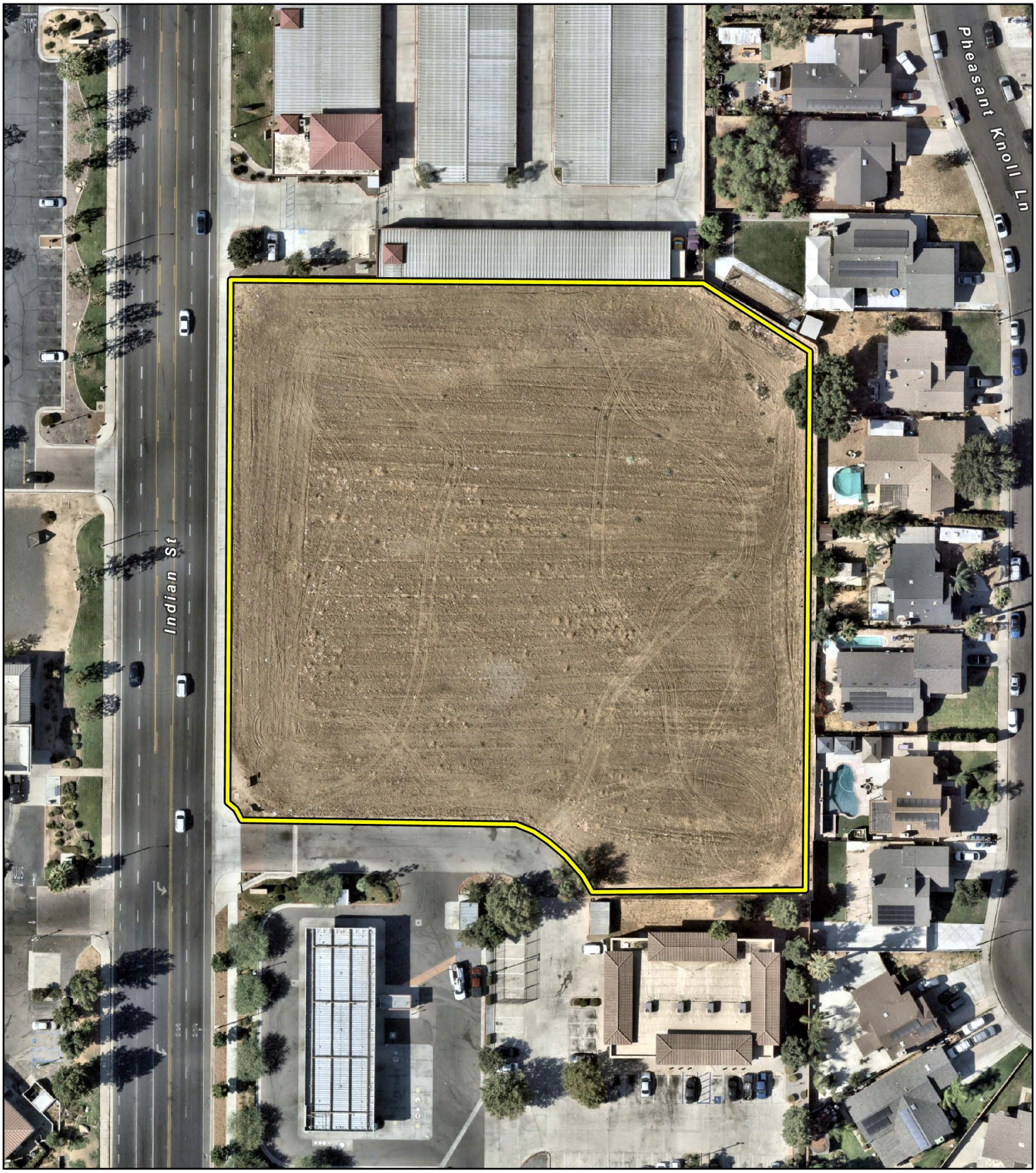
0 500 1000
FEET

SOURCE: Google Maps (2024)

I:\2024\20241908\GIS\Pro\Moreno Valley Public Storage\Public Storage Moreno Valley Project.aprx (1/12/2025)

Public Storage Moreno Valley Project

Regional and Project Location



LSA

Project Location

FIGURE 2

N

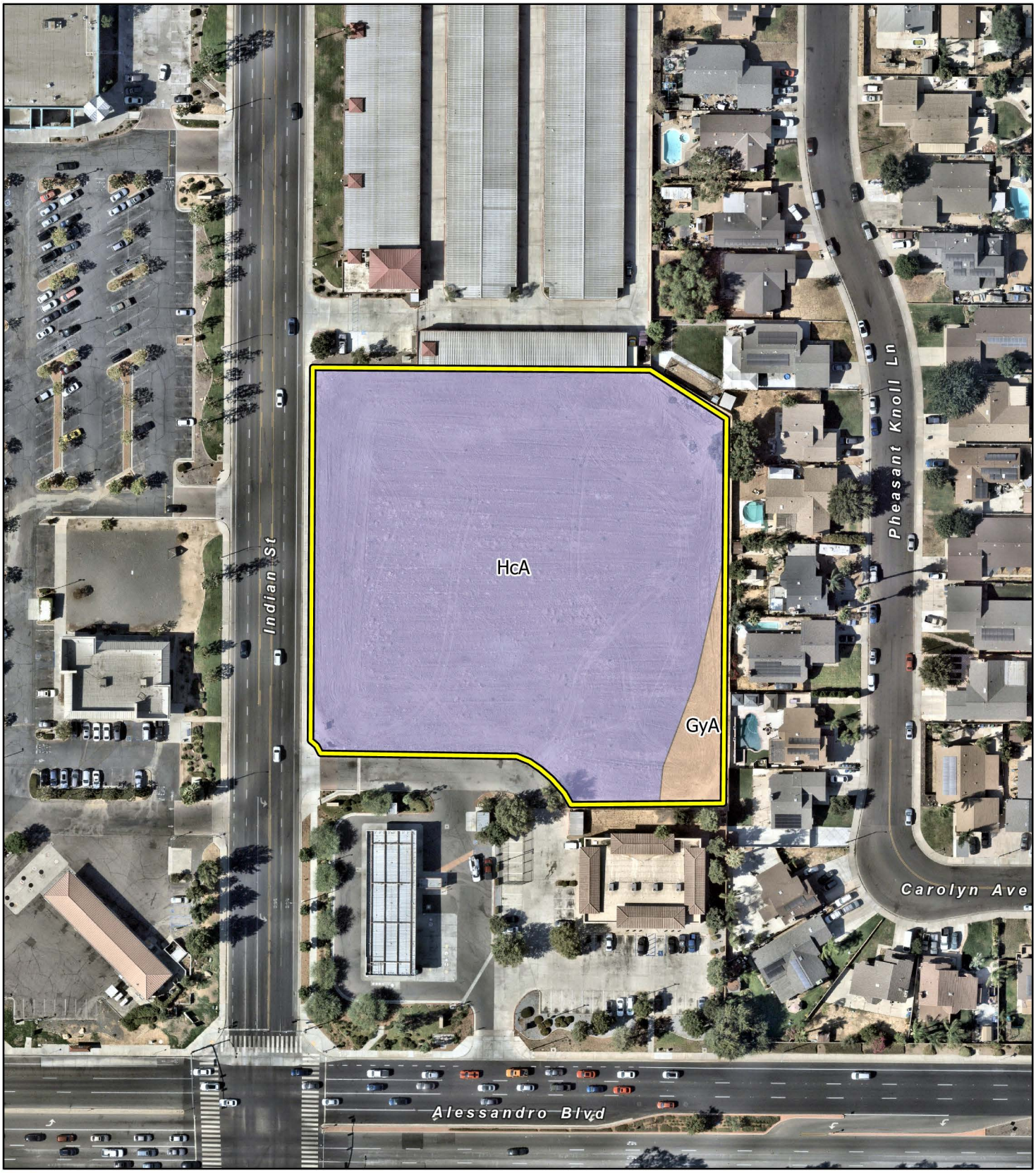
0 40 80
FEET

SOURCE: Nearmap (8/27/2024)

I:\2024\20241908\GIS\Pro\Moreno Valley Public Storage\Public Storage Moreno Valley Project.aprx (12/9/2024)

Public Storage Moreno Valley Project

Project Area



LSA

Project Location

Soils

GyA - Greenfield sandy loam, 0 to 2 percent slopes

HcA - Hanford coarse sandy loam, 0 to 2 percent slopes

N

0 50 100

FEET

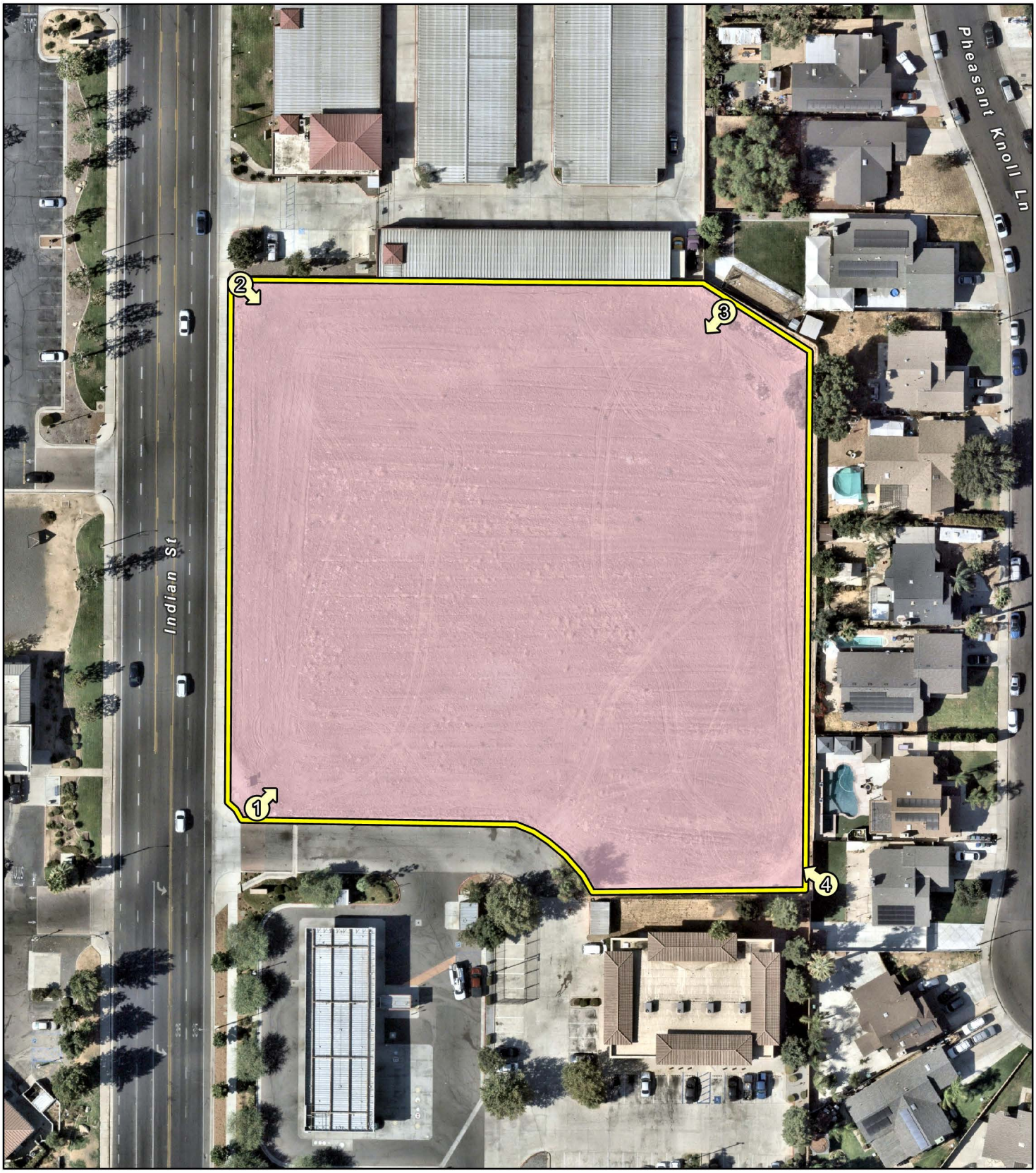
FIGURE 3

Public Storage Moreno Valley Project

Soils

SOURCE: Nearmap (8/27/2024)

I:\2024\20241908\GIS\Pro\Moreno Valley Public Storage\Public Storage Moreno Valley Project.aprx (12/9/2024)



LSA

Project Location

Photo Points

Vegetation

Ruderal/Nonnative Annual Grassland

N

0 40 80

FEET

SOURCE: Nearmap (8/27/2024)

I:\2024\20241908\GIS\Pro\Moreno Valley Public Storage\Public Storage Moreno Valley Project.aprx (1/3/2025)

FIGURE 4

Public Storage Moreno Valley Project

Vegetation and Photo Points

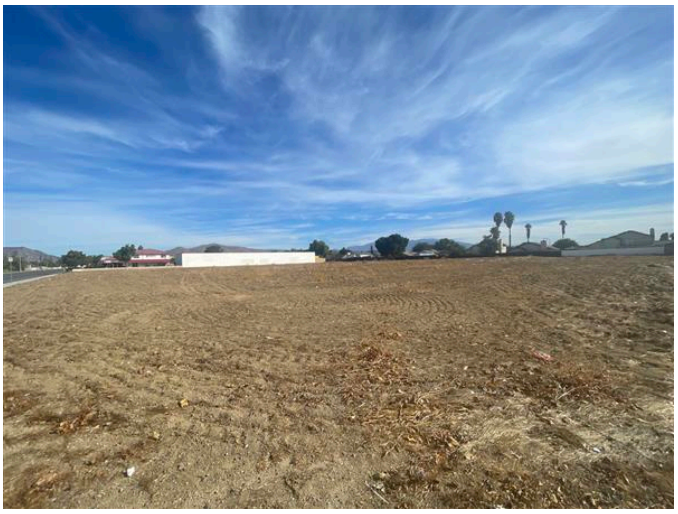


Photo 1: View looking north from southern boundary of Project.

Photo 2: View looking southeast from northwest boundary of the Project.

Photo 3: View looking towards Indian Street from the northeastern boundary of the Project.

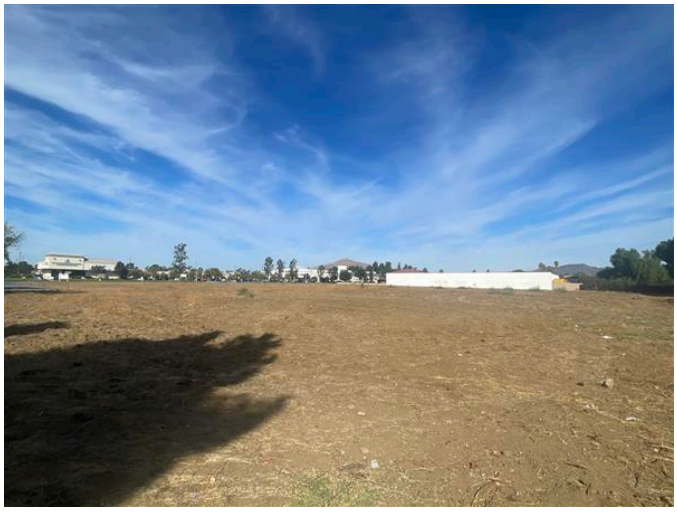


Photo 4: View looking northwest from southeastern boundary of the Project.

LSA

FIGURE 5

Public Storage Moreno Valley Project

Representative Site Photographs

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APPENDIX B

PLANT AND ANIMAL SPECIES OBSERVED

Scientific Name	Common Name
MAGNOLIID FLOWERING PLANTS	
Asteraceae	**Sunflower family**
Ambrosia acanthicarpa	Flatspine bur ragweed
Deinandra paniculata	Paniculate tarplant
Euphorbiaceae	**Spurge family**
Croton setigerus	Dove weed
Euphorbia polycarpa	Smallseed sandmat
Lamiaceae	**Mint family**
Trichostema lanceolatum	Vinegar weed
Malvaceae	**Mallow family**
*Malva parviflora**	Cheeseweed mallow
Salicaceae	**Willow family**
Salix gooddingii	Goodding's willow
MONOCOT FLOWERING PLANTS	
Arecaceae	**Palm family**
*Washingtonia robusta**	Mexican fan palm
Poaceae	**Grass family**
*Avena barbata**	Slender wild oat
*Cynodon dactylon**	Bermuda grass
*Pennisetum setaceum**	African fountain grass
BIRDS	
Passeridae	**Old World Sparrows**
*Passer domesticus**	House sparrow
Fringillidae	**Finches**
Haemorhous mexicanus	House finch
Parulidae	**Wood Warblers**
Setophaga coronata	Yellow-rumped warbler