



**Biological Resources Report
for the Inyo Retail Cannabis Project,
Inyo County, California**

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A handwritten signature in blue ink, appearing to read 'J.R. Sundberg'.

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Acronyms and Abbreviations

CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CWA	Clean Water Act
ESA	Endangered Species Act
MBTA	Migratory Bird Treaty Act
project	Inyo Retail Cannabis
RECON	RECON Environmental, Inc.
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

Summary

This report provides the results of the biological resources survey for the Inyo Retail Cannabis Project (project) in Inyo County, California. The total project footprint, encompassing permanent and temporary impacts, consists of 9.65 acres of commercially- and rural residential-zoned land located in the unincorporated Charleston View area of the county, approximately 20 miles east of the community of Tecopa.

The project site is located on the south side of Old Spanish Trail, between Carpenter Road and Rose Avenue. The project site consists of four parcels: Assessor Parcel Numbers 048-391-105 (Lot 5), 048-391-106 (Lot 6), 048-391-111 (Lot 11), and 048-391-112 (Lot 12), owned by Inyo Face, LLC totaling approximately 9.65 acres. The four parcels are proposed for development for both retail and production facilities for recreational cannabis.

The following vegetation communities or land cover types were mapped within the project area: creosote bush scrub and disturbed habitat. The project would not impact sensitive vegetation communities. Three sensitive plant species—gravel milk-vetch, Nye milk-vetch, and Goodding's phacelia—were observed or have a moderate or high potential to occur within the project site. Two sensitive wildlife species, desert tortoise and burrowing owl, have a low potential to occur within the project site. These species have a low potential to breed on or adjacent to the project site. A pre-activity survey can be conducted to detect these species prior to construction. If these species are present, species-specific mitigation can be employed to avoid or minimize impacts to these species. If the species are not observed during pre-activity surveys, the potential impacts are considered less than significant and would, therefore, require no species-specific mitigation measure.

1.0 Introduction

This biological resources report was prepared by RECON Environmental, Inc. (RECON) for the Inyo Retail Cannabis Project (project) proposed by Inyo Face, LLC. The purpose of this biological resources report is to (1) document the existing biological conditions within the project survey area; (2) evaluate the survey area and the vicinity for the potential to support sensitive biological resources; (3) provide an analysis of potential impacts associated with the proposed project; and (4) provide a discussion of potential avoidance, minimization, and mitigation measures that may be required to reduce potential impacts to sensitive biological resources to below a level of significance.

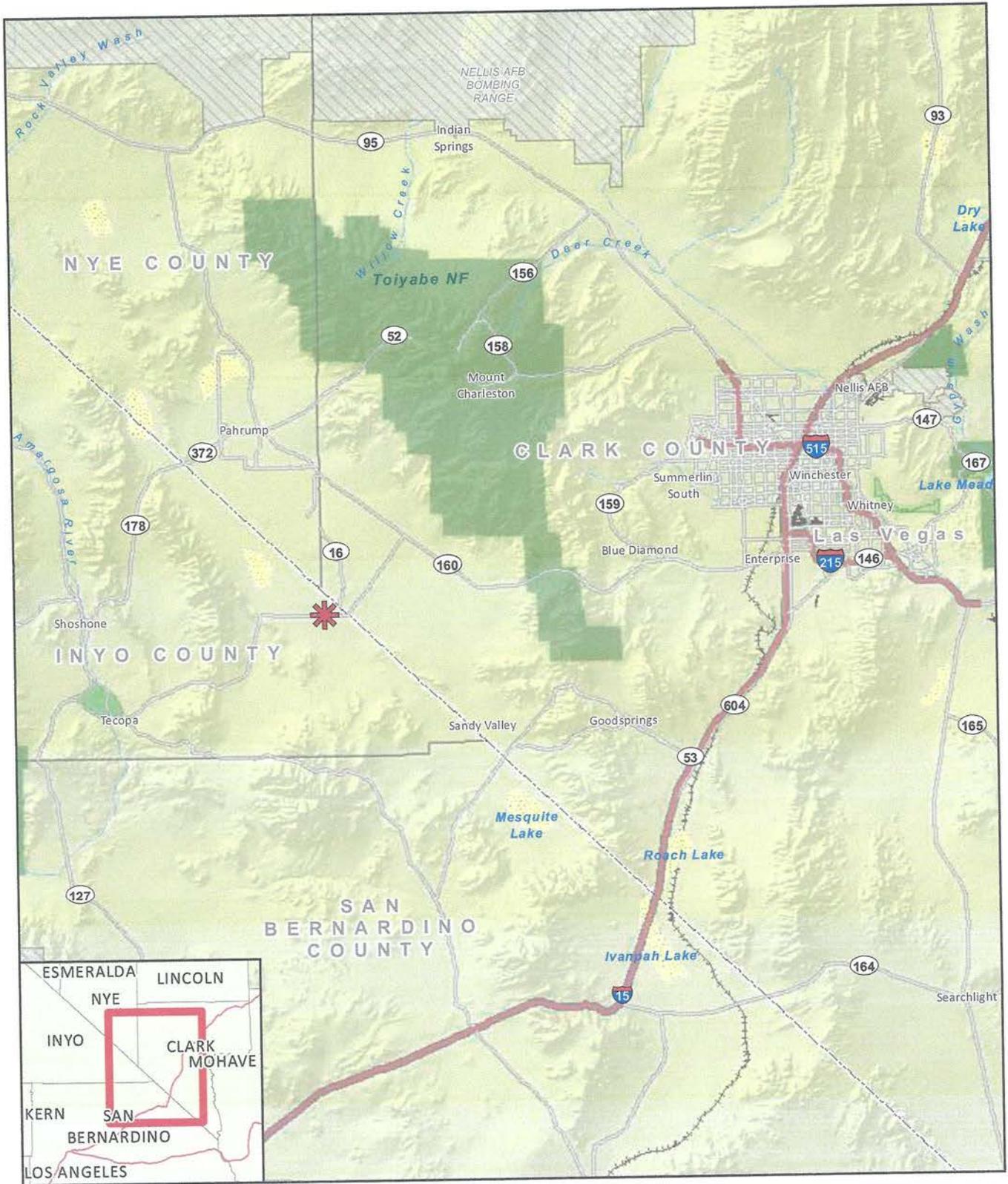
1.1 Project Location

The project would be located in the unincorporated Charleston View area of the Pahrump Valley, in southeastern Inyo County, approximately 20 miles east of the community of Tecopa and approximately 45 miles west of the city of Las Vegas, Nevada. Figure 1 shows the regional location of the project. The project site comprises four parcels: Assessor Parcel Numbers 048-391-105 (Lot 5), 048-391-106 (Lot 6), 048-391-111 (Lot 11), and 048-391-112 (Lot 12), totaling approximately 9.65 acres owned by Inyo Face, LLC. Each parcel covers 2.41 acres, and is bounded by roads on two sides.

The project site is located in the northwestern quarter of Section 34, Township 22 North, Range 10 East, on the U.S. Geological Survey (USGS) Calvada Springs quadrangle (USGS 1984; Figure 2). An aerial photograph of the survey area is shown on Figure 3.

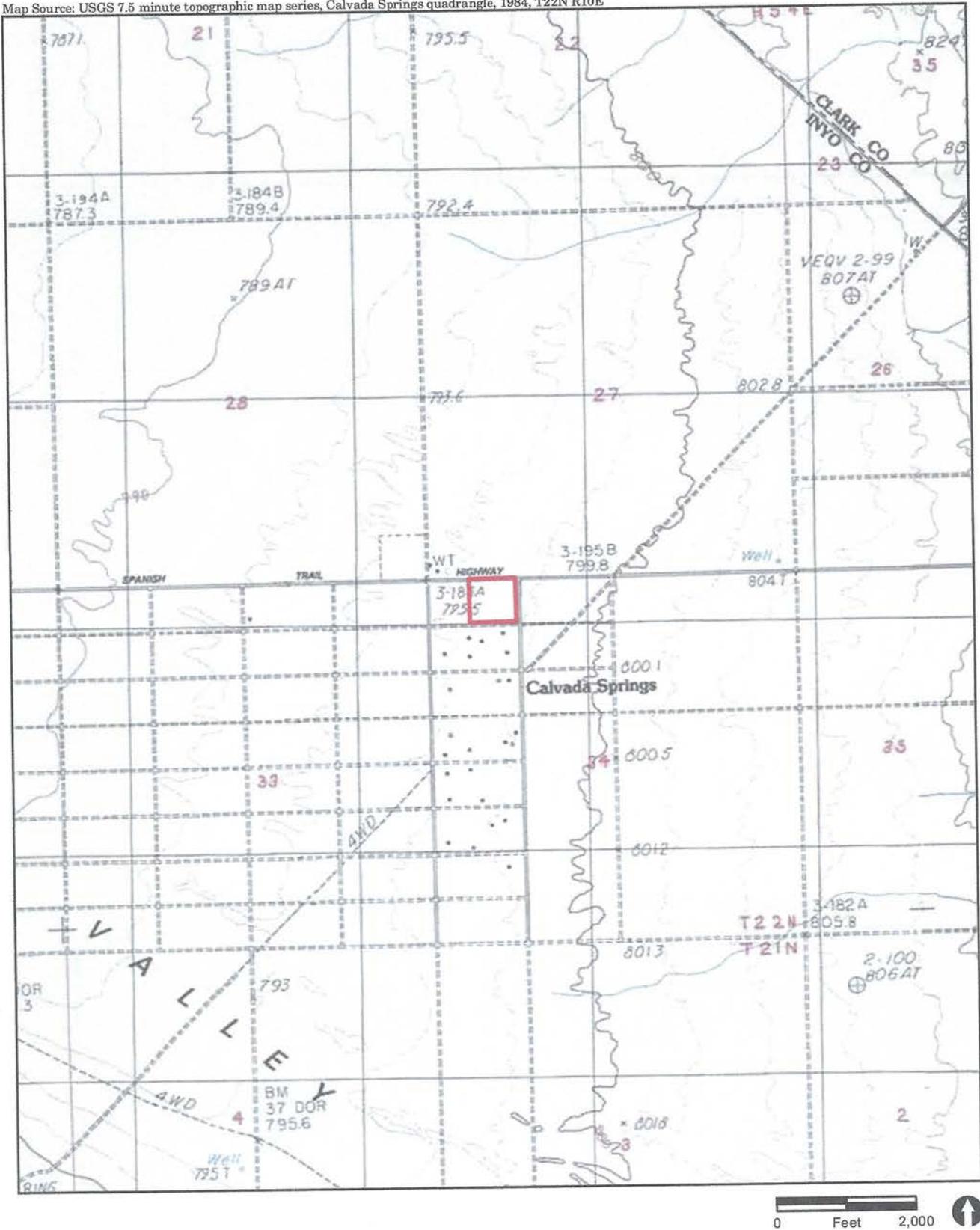
1.2 Project Description

The project is a joint retail and production facility for recreational cannabis. The total proposed project development footprint, encompassing both temporary and permanent impacts, would be 9.65 acres; however, the four lots will be built separately. All four lots are planned for development but are scheduled to be built at different times. The first lots to be developed are 5 and 12 and would be the location of the described facility. The facility would consist of a single-story commercial building, parking lots, secure staging yard, and landscaping. There would be customer and delivery access from Old Spanish Trail, and emergency access from Hall Lane. Electrical utilities are accessible from Old Spanish Trail and water would be from a proposed well. Sewage would be handled with an on-site septic system.



 Project Location

FIGURE 1
Regional Location



Project Boundary

FIGURE 2

Project Location on USGS Map



 Project Boundary

FIGURE 3
Project Location on Aerial Photograph

2.0 Methods

Biological resource data for the project was obtained from a literature review and general biological survey (Table 1).

Date	Survey Type	Surveyor(s)	Beginning Conditions	Ending Conditions
4/14/2020	General biological survey	J. Sundberg	15:00; 69°F; 0–5 mph wind; sunny	18:00; 67°F; 5–10 mph wind; sunny
4/15/2020	General biological survey	J. Sundberg	15:00; 50°F; 0 mph wind; sunny	15:00; 61°F; 0–2 mph wind; sunny

2.1 Literature Review

RECON conducted an analysis of existing sensitive species data recorded within ten miles of the project site. This analysis included searches of the California Natural Diversity Database (CNDDDB; California Department of Fish and Wildlife [CDFW] 2020), the All Species Occurrences Database (U.S. Fish and Wildlife Service [USFWS] 2020), and a search of the California Native Plant Society (CNPS) online rare plants database within the nine USGS quadrangles including and surrounding the site (CNPS 2020). Additional maps, imagery, and databases reviewed included USGS topographic maps (1984), online aerial satellite imagery (Google Earth 2020), and the Consortium of California Herbaria (2020).

In addition to those species with database records within ten miles of the project site, potentially occurring species were assessed if their ranges extend into the project site and habitat conditions within the project site were potentially suitable. Determination of the potential occurrence for sensitive species was based upon known ranges and habitat preferences for the species (Jennings and Hayes 1994; Baldwin et al 2012; Jepson Flora Project 2020; and CNPS 2020).

2.2 General Biological Survey

RECON biologist Jason R. Sundberg conducted a general biological survey of the project site on April 14 and 15, 2020. The survey included preparation of a vegetation map, documentation of plant and animal species present during the survey, a search for sensitive plant and animal species, an assessment potential for jurisdictional waters on the project site. Vegetation community classifications followed Sawyer et al. (2009) with non-conforming areas defined as disturbed habitat. Dominant plant species, average height, and density were noted for each vegetation community. Digital photographs of representative areas were taken during the surveys. Mr. Sundberg also assessed the suitability of habitat for sensitive species identified as having potential to occur based on the literature review discussed above.

Zoological nomenclature is in accordance with the Checklist of North and Middle American Birds (Chesser et al. 2020); Scientific and Standard English Names of Amphibians and Reptiles of North America North of Mexico (Crother et al. 2017); the Revised Checklist of North American Mammals North of Mexico (Baker et al. 2003), San Diego Natural History Museum (2002) for butterflies, and Field Guide to Insects and Spiders of North America for (Evans 2008) insects and spiders. Floral nomenclature for common plants follows Baldwin (2012) as updated by the Jepson Online Interchange (Jepson Flora Project 2020) and for sensitive plants the CNPS online database (2020). If a plant's common name was not provided in these resources, common names were obtained from Rebman and Simpson (2014), or the U.S. Department of Agriculture (USDA) maintained database (USDA 2020).

3.0 Survey Results/Existing Conditions

This section describes the existing physical and biological conditions of the project site and surrounding area. This includes a summary of land use, topographical features, soils, and hydrological features observed during biological surveys conducted on April 14 and 15, 2020.

3.1 Physical Characteristics

3.1.1 Existing Land Use

The project site consists of commercially- and rural residential-zoned land that is partially disturbed due to vehicle access, dumping, and utility corridors. The project site is bounded by Old Spanish Trail to the north, undeveloped privately-owned lots to the east and west, and a rural residential area to the south. Infrastructure that occurs within the project site includes an electrical distribution line and a community refuse collection dumpster. All four parcels are relatively homogenous and contain similar levels of disturbance.

3.1.2 Topography, Soils, and Hydrology

Elevation within the project site is approximately 2,600 feet above mean sea level (USGS 1984). Topography is generally level, with the exception of human-made ditches along the boundaries of the project site. The area currently does not have soil maps but the substrate consists of stable alluvium from the surrounding mountains and is likely an aridosol or entisol, as shown on the nearest soil maps in Clark County, Nevada, approximately 2.5 miles east (USDA 2006). Aridosols are soils formed in dry, hot climates, and often exhibit hardpans composed of soluble minerals. The hardpans can support deep animal burrows. Entisols are soils lacking extensive soil horizon development, due to factors such as limited water movement such as in an arid environment. The site is within the Pahrump Valley watershed, a closed basin draining toward a dry lake (USGS 1984).

3.2 Biological Resources

The following sections describe the biological resources found within the project site. All four lots are adjoining and fairly similar in habitat composition and quality. Resource description applies to all four lots, except where specified.

3.2.1 Botanical Resources

Two vegetation communities and land cover types were mapped within the project site: creosote bush scrub (*Larrea tridentata* Shrubland Alliance as per Sawyer 2009), and disturbed habitat. Table 2 provides a breakdown of acreage by parcel. A brief description of each community or land cover type is provided below in order of prevalence within the project site.

Community or Type	Lot 5	Lot 6	Lot 11	Lot 12	Acreage
creosote bush scrub	1.75	2.11	2.15	2.41	8.40
disturbed habitat	0.67	0.30	0.26	0.01	1.24
Total	2.41*	2.41	2.41	2.41	9.65*

* Sum differs due to rounding.

A total of 17 plant species was observed within the project site, with 14 species (83 percent) considered native and the remaining three species (17 percent) considered non-native and/or naturalized into the area. Dominant plant species are discussed by vegetation community below, and a complete list of plant species detected is included as Attachment 1. Figure 4 illustrates the vegetation mapped within the project area.

3.2.1.1 Creosote Bush Scrub

Creosote bush scrub occurs in the Mojave and Sonoran deserts on alluvial fans, upland slopes, and desert pavement. Creosote bush scrub typically has an open (less than 33 percent absolute cover) shrub layer dominated or co-dominated (30 to 50 percent relative cover) by creosote bush, and a sparse herbaceous layer.

Creosote bush scrub occupies most of the project site. Creosote bush is the dominant shrub species throughout this community. There is some variability in subdominant species depending on the soil surface texture. Within the project site, shrub density is lower than is typical at approximately 10 percent; whereas outside the project site, shrub cover within the creosote bush scrub averages between 10 and 20 percent absolute cover. Desert pavement areas, which have higher density of weathered cobble and gravel at the surface, have lower absolute vegetative cover and white bur-sage (*Ambrosia dumosa*) as the subdominant shrub. Waterjacket (*Lycium andersonii*) and matchweed (*Gutierrezia sarothrae*) are the subdominant shrubs in the areas with fines (sand, silt) surface predominating. The areas with fines at the surface also have scattered mesquite (*Prosopis glandulosa*) and tamarisk (*Tamarix ramosissima*). Throughout the project site, herbaceous cover is low, reaching up to five percent cover in some areas, and includes primarily non-natives such as redstem filaree (*Erodium cicutarium*) and red brome (*Bromus rubens*). Throughout the creosote bush scrub within the project site, there is some level of disturbance in all areas, such as dumping of trash and landscape debris, tracks from off-road driving, small human-made excavation holes, and scattered construction materials.



 Project Boundary

Land Cover

 Disturbed Habitat

 Creosote Bush Scrub (*Larrea tridentata* Shrubland Alliance)



FIGURE 4

Existing Biological Resources

3.2.1.2 Disturbed Habitat

Disturbed habitat consists of bare ground and dirt roads that are subjected to continued disturbance from vehicular use, which prevents establishment of substantial vegetation cover. In Lot 5, a community dumpster, and message board are located within a larger patch of disturbed habitat. Lot 12 has less dirt roads passing through and less mapped disturbed habitat. The few plants that occur within these areas include redstem filaree, red brome, saltlover (*Halogeton glomeratus*), and occasional shrubs, such as white bur-sage, matchweed, and creosote bush, occur near the edges.

3.2.2 Zoological Resources

A total of 17 animal species was detected within the project site (Attachment 2). These animal species are typical of the Mojave Desert, and are summarized below. Sensitive wildlife species observed are discussed in Section 3.3.4.

Invertebrates detected during the 2020 survey include harvester ant (subfamily Myrmicinae), painted lady (*Vanessa cardui*), and honey bee (*Apis mellifera*). Two reptile species were observed: common side-blotch lizard (*Uta stansburiana*) and Great Basin tiger whiptail (*Aspidoscelis tigris tigris*).

Bird species observed within or adjacent to the project site include verdin (*Auriparus flaviceps acaciaram*), mourning dove (*Zenaida macroura marginella*), common raven (*Corvus corax clarionensis*), and black-throated sparrow (*Amphispiza bilineata deserticola*).

Three mammal species were detected during the 2020 biological survey: desert cottontail (*Sylvilagus audubonii*), white-tailed antelope squirrel (*Ammospermophilus leucurus*), and feral ass (*Equus asinus*).

3.3 Sensitive Biological Resources

3.3.1 Regulatory Setting

3.3.1.1 Regulatory Framework

Various federal and state regulations or policies apply to biological resources on or adjacent to the project parcels and are summarized below.

a. Federal Regulations

The federal Endangered Species Act (ESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered 'take' under the ESA. Section 9(a) of the ESA defines 'take' as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." The ESA is administered by the USFWS.

The Migratory Bird Treaty Act (MBTA; 16 United States Code 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The regulatory definition of “migratory bird” is broad and includes any mutation or hybrid of a listed species and any part, egg, or nest of such birds (50 Code of Federal Regulations 10.12). The MBTA, which is enforced by USFWS, makes it unlawful “by any means or in any manner, to pursue, hunt, take, capture, [or] kill” any migratory bird, or attempt such actions, except as permitted by regulation. Pursuant to U.S. Department of the Interior Memorandum M-37050, the federal MBTA is no longer interpreted to cover incidental take of migratory birds (U.S. Department of the Interior 2017). Therefore, impacts that are incidental to implementation of an otherwise lawful project would not be considered significant.

The Rivers and Harbors Act of 1899 and the Clean Water Act (CWA) regulate project activities within non-marine navigable waters and/or waters of the U.S. The discharge of any pollutant from a point source into navigable waters is illegal unless a permit under the CWA’s provisions is acquired. Permitting for projects that include both permanent and temporary dredging and filling in wetlands and waters of the U.S. is overseen by the U.S. Army Corps of Engineers under Section 404 of the CWA. Projects can be permitted on an individual basis or be covered by one of several approved nationwide or regional general permits.

b. State Regulations

The California Environmental Quality Act (CEQA) requires an environmental review for projects with potentially adverse impacts on the environment. Adverse environmental impacts are typically mitigated in accordance with state laws and regulations.

The California ESA is similar to the federal ESA in that it provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction.

Section 3503 of the California Fish and Game Code states that 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,” and Section 3503.5 states that it is “unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird” unless authorized (State of California 1991).

California Fish and Game Code Sections 1600 through 1603 regulate project activities within wetlands and riparian habitats. The CDFW can issue a Streambed Alteration Agreement for projects affecting riparian and wetland habitats.

Fill or dredge within waters of the U.S., or waters of the state, including non-wetland waters, wetland waters, and isolated waters, require a Water Quality Certification by the California Regional Water Quality Control Board under Section 401 of the CWA and Section 13000 et seq. of the California Water Code under the Porter-Cologne Water Quality Control Act.

3.3.1.2 Sensitivity Criteria

Vegetation communities are considered sensitive natural communities if they are of limited distribution; have federal, state, or local laws regulating their development; and/or support concentrations of sensitive plant or wildlife species. For purposes of this report, vegetation communities are considered sensitive if they are: (1) communities with state rarity ranks of S1-S3, as reviewed by the Vegetation Classification and Mapping Program (VegCAMP) and CNPS, and recognized by CDFW (2020); and (2) wetlands and waters under the jurisdiction of federal and state agencies.

For purposes of this report, plant and wildlife species would be considered sensitive if they are:

1. listed by state or federal agencies as rare, threatened, or endangered or are proposed for listing;
2. given a California Rare Plant Rank (CRPR) 1B (considered endangered throughout its range), 2 (considered endangered in California but more common elsewhere), 3 (more information about the plant's distribution and rarity needed), or 4 (plants of limited distribution) in the CNPS Inventory of Rare and Endangered Vascular Plants of California (2020);
3. considered rare, endangered, or threatened by the CDFW (2019).

3.3.2 Sensitive Vegetation Communities

None of the vegetation communities on the project site are considered sensitive.

3.3.3 Sensitive Plant Species

One sensitive plant species, gravel milk-vetch (*Astragalus sabulorum*), was observed during the biological survey conducted in this project. Gravel milk-vetch is a CNPS CRPR 1B.1 species (CNPS 2020) but is not state or federally listed. Four individuals were observed in Lot 6 on the northwestern corner along Old Spanish Trail Highway.

Two other sensitive plant species were determined to have a moderate or high potential to occur within or adjacent to the project site: Goodding's phacelia (*Phacelia pulchella* var. *gooddingii*; CNPS CRPR 2B.2) and Nye milk-vetch (*Astragalus nyensis*; CNPS CRPR 1B.1). These are discussed in detail in Attachment 3.

3.3.4 Sensitive Wildlife Species

No sensitive wildlife species were observed during the biological survey conducted for this project. Two sensitive wildlife species were determined to have potential to occur within or adjacent to the project site: desert tortoise (*Gopherus agassizii*) and burrowing owl (*Athene cunicularia*). Desert tortoise is a federally listed species and while the potential is considered low, the project site is located within the Eastern Mojave Recovery Unit

(USFWS 2011) and a pre-project survey may be required. Burrowing owl is a California species of special concern and while the potential for this species is considered to be low based on habitat quality, pre-activity surveys may be required. All other species are discussed in Attachment 4.

3.3.5 Wildlife Movement Corridors

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. The project site lies adjacent to a large expanse of undeveloped desert, which provides unconstrained habitat connectivity within the Pahrump Valley and surrounding mountains. While the project site is part of general habitat that provides for local movement of terrestrial wildlife, it does not serve as a corridor.

3.3.6 Jurisdictional Wetlands and Waters

The project site does not support any jurisdictional waters of the U.S. or State, as defined by U.S. Army Corps of Engineers, CDFW, and the Regional Water Quality Control Board.

4.0 Project Impact Analysis

The total proposed project development footprint across the four lots, encompassing both temporary and permanent impacts, would result in an impact to the entire 9.65 acres. The four lots will be built separately and Table 2 (above) provides a breakdown of impacts to the vegetation by lot.

In accordance with Appendix G of the CEQA Guidelines, the project would have a significant impact if it would:

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFW or USFWS;
- 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;
- 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;
- 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;

- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.1 Impacts to Sensitive Vegetation Communities

Neither of the vegetation communities present within the project site is considered sensitive. Impacts would not be considered significant and would not require mitigation.

4.2 Impacts to Sensitive Plant Species

The project has potential to impact Gravel's milk-vetch or Nye milk-vetch and Goodding's phacelia, if present. These species are known from numerous records within one mile of the project site; however, project impacts are not expected to affect the long-term survival of the species or the local population. Therefore, potential impacts to these species would be less than significant.

4.3 Impacts to Sensitive Wildlife Species

The project has potential to impact to sensitive wildlife species that occur within the project impact area. Direct impacts would result from incidental mortality and habitat removal within the project construction footprint. No sensitive wildlife species were observed and most wildlife would have the ability to disperse away from construction activities.

Desert tortoise has low potential to burrow on-site; however, if present, it would have limited mobility to disperse from construction activities. This could result in the potential for impacts from construction. Approximately 9.65 acres of suitable foraging habitat for desert tortoise is present and impacts could occur if the species begins to use the site. Impacts to individuals and their habitat would be considered significant. A pre-activity survey would be required and if detected, an avoidance and mitigation plan would need to be developed and approved by the regulatory wildlife agencies.

While adult western burrowing owls are capable of dispersing away from construction activities, if it is nesting on site, eggs, chicks and any adults brooding on the nest would have limited ability to avoid construction equipment and could be impacted. Approximately 9.65 acres of suitable breeding and wintering habitat for burrowing owl is present and impacts to breeding individuals could occur if the species begins to use the site during the breeding season. Impacts to wintering and breeding individuals would be considered significant. A pre-activity survey would be required and if detected, an avoidance and mitigation plan would need to be developed and approved by the regulatory wildlife agencies.

Nesting birds including raptors covered under the California Fish and Game Code 3503 and 3503.5 have potential to be directly impacted by the project if construction activities (i.e., clearing, grubbing, grading) occur during the general nesting season of February 1 to September 15. Direct impacts to nesting birds and raptors would be considered significant and require avoidance measures.

Direct impacts to LeConte's thrasher, or other nesting birds from construction activities would be considered less than significant for the following reasons: the site is surrounded by large expanses of desert habitat to the north, east, and west that provides foraging habitat and nesting for bird species that occur locally; the population of any of these species on-site would not represent a substantial component of the region's population and impacts to individuals would not preclude the ability for the species to be self-sustaining. No mitigation beyond what would be required for nesting birds would be required.

4.4 Impacts to Wildlife Corridors

No significant direct or indirect impacts to wildlife movement are expected to occur from implementation of the project, as the project parcels do not function as a true wildlife movement corridor.

4.5 Cumulative Impacts

The project is not expected to result in cumulative impacts to sensitive resource within the region because all potential impacts would be mitigated to a level of less than significant.

5.0 References Cited

- Baker, R. J., Lisa C. Bradley, Robert D. Bradley, Jerry W. Dragoo, Mark D. Engstrom, Robert S. Hoffman, Cheri A. Jones, Fiona Reid, Dale W. Rice, and Clyde Jones
2003 Revised Checklist of North American Mammals North of Mexico. Occasional Papers, Museum of Texas Tech University No. 229. December.
- Baldwin, B. G., D. Goldman, D. J. Keil, R. Patterson, T. J. Rosatti, and D. Wilken (editors)
2012 *The Jepson Manual: Vascular Plants of California*. Second edition, thoroughly revised and expanded. University of California Press, Berkeley, Los Angeles, and London. January.
- California Department of Fish and Wildlife (CDFW)
2012 Staff Report on Burrowing Owl Mitigation. State of California. Natural Resources Agency, Department of Fish and Game. March 7.
2019 Natural Diversity Database. August 2019. Special Animals List. Periodic publication. 67 pp.
2020 State and Federally Listed Endangered, Threatened, and Rare Plants of California. Natural Diversity Database. April 16.
- California Native Plant Society (CNPS)
2020 Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Nine-quadrangle database search conducted on April 16. <http://www.rareplants.cnps.org>.
- California, State of
1991 Fish and Game Code of California.
- Chesser, R. T., K. J. Burns, C. Cicero, J. L. Dunn, A. W. Kratter, I. J. Lovette, P. C. Rasmussen, J. V. Remsen, Jr., D. F. Stotz, B. M. Winger, and K. Winker
2020 Checklist of North and Middle American Birds (online). American Ornithological Society. <http://checklist.aou.org/taxa>.
- Consortium of California Herbaria
2020 Data provided by the participants of the Consortium of California Herbaria (ucjeps.berkeley.edu/consortium/). Accessed April 2020.

Crother, B. I., Rondald M. Bonett, Jeff Boundy, Frank T. Burbrink, Kevin de Queiroz, Darrel R. Frost, Richard Highton, John B. Iverson, Elizabeth L Jockusch, Fred Kraus, Kenneth L. Krysko, Adam D. Leaché, Emily Moriarty Lemmon, Roy W. McDiarmid, Joseph R. Mendelson III, Peter A. Meylan, Tod W. Reeder, Sara Ruane, Michael E. Seidel

2017 *Scientific and Standard English Names of Amphibians and Reptiles of North America North of Mexico, with Comments Regarding Confidence in Our Understanding*. Eighth Edition. Society for the Study of Amphibians and Reptiles Herpetological Circular 43.

Evans, Arthur V.

2008 *Field Guide to Insects and Spiders of North America*. Sterling Publishing Company, New York.

Garrett, K., and J. Dunn

1981 *Birds of Southern California: Status and Distribution*. Los Angeles Audubon Society, Artisan Press, Los Angeles.

Google Earth

2020 Aerial imagery. Accessed between March 5 and June 16.
<https://www.google.com/maps>

Jennings, M. R., and M. P. Hayes

1994 *Amphibian and Reptile Species of Special Concern in California*. Final report submitted to the California Department of Fish and Game, Inland Fisheries Division, Rancho Cordova, CA. Contract number 8023.

Jepson Flora Project (eds.)

2020 Jepson eFlora. Accessed between April 1 and 29, 2020.
<http://ucjeps.berkeley.edu/eflora/>.

Rebman, J. P., and M. G. Simpson

2014 *Checklist of the Vascular Plants of San Diego County*, 5th edition. San Diego Natural History Museum.

San Diego Natural History Museum (SDNHM)

2002 *Butterflies of San Diego County*, prepared by Michael Klein. Revised September 2002. <http://www.sdnhm.org/science/entomology/projects/checklist-of-butterflies-of-san-diego-county/>.

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens

2009 *A Manual of California Vegetation*. Second Edition. California Native Plant Society. Sacramento, California, USA.

U.S. Department of Agriculture (USDA)

2006 *Soil Survey of Clark County Area, Nevada*.

2013 *Plants Database*. <http://plants.usda.gov>. Accessed April-June 2020. U.S. Department of the Interior

2017 Memorandum M-37050. The Migratory Bird Treaty Act Does Not Prohibit Incidental Take. December 22.

U.S. Fish and Wildlife Service (USFWS)

2018 Preparing for any Action that may Occur Within the Range of the Mojave Desert Tortoise (*Gopherus agassizii*). USFWS Desert Tortoise Recovery Office. Version October 26, 2018.

2019 All Species Occurrences Database. Accessed March 2019.
<https://www.fws.gov/carlsbad/GIS/CFWOGIS.html>.

2020 California Condor Recovery Program. Accessed June 22, 2020.
<https://www.fws.gov/cno/es/CalCondor/Condor.cfm>

U.S. Geological Survey (USGS)

1984 Calvada Springs, California 7.5 Minute Topographic Map.

Unitt, P. A.

2004 *San Diego County Bird Atlas*. San Diego Natural History Museum, Ibis Publishing Company. San Diego, California. October.