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May 15, 2017

Mr. Mario Suarez
Planning Division
City of Colton Development Services Department
659 La Cadena Drive
Colton, California 92324

Subject: Biological Resources Assessment of the Proposed Colton Tropica Warehouses Project,
City of Colton, San Bernardino County, California (LSA Project No. CLT1701)

Dear Mr. Suarez:

LSA was retained by the City of Colton (City) to conduct a biological resources assessment of the approximately 22.2-acre project site located just west of South La Cadena Drive and south of the Santa Ana River in the City of Colton in San Bernardino County. The proposed project site is located within the Jurupa (Stearns) Land Grant as shown on the United States Geological Survey (USGS) *San Bernardino South, California* 7.5-minute quadrangle (Figure 1; all figures attached). The proposed project includes construction of three warehouse buildings totaling 266,030 square feet (sf) (i.e., Building 1, 190,100 sf; Building 2, 45,160 sf; and Building 3, 30,770 sf). There will also be a total of 241 auto parking stalls (171 at Building 1, 39 at Building 2, and 31 at Building 3) and a total of 212 trailer parking stalls (199 at Building 1 and 13 at Building 2) provided. Refer to Figure 2 for a drawing of the proposed project.

METHODS

A literature review was conducted to investigate the potential occurrence of sensitive species on or in the vicinity of the project site. Database records for the *San Bernardino South, California* USGS 7.5-minute quadrangle were searched on April 18, 2017, using *Rarefind* 5 Version 5.2.7, California Department of Fish and Wildlife (CDFW), California Natural Diversity Data Base (CNDDDB), the California Native Plant Society (CNPS) *Electronic Inventory of Rare and Endangered Vascular Plants of California* online edition, v8-03, and the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) website.

The biological survey included a site visit on April 19, 2017, by LSA Associate/Biologist Maria Lum. Notes were made on general site conditions, the vegetation, potential jurisdictional waters, wildlife species observed, and the suitability of habitat for various species of special concern. Plant and animal species observed during the field survey were recorded (Table A, attached). The assessment was conducted to address compliance with the California Environmental Quality Act (CEQA). Weather conditions were clear with 3 mph winds to the south and the temperature was 86°F.

ENVIRONMENTAL SETTING

Existing and Adjacent Land Use

The project site is currently in a vacant, undeveloped lot abutted by single-family residential units and bluffs to the south; bluffs, high voltage electrical towers, rural residential uses, and vacant undeveloped land to the west; the Santa Ana River and vacant undeveloped land to the north; and South La Cadena Drive, vacant land, and railroad tracks to the east. Interstate 10 (I-10) is approximately 1.6 miles to the north and Interstate 215 (I-215) is approximately 0.8 mile to the east and south of the project site. Three lines of local power distribution poles traverse the site (Figure 2). Two high-voltage electrical easements currently run through the project site in an east-west direction. One electrical easement is located along the central portion of the site, while the other runs through the southern central portion of the site. Figure 2 provides an overview of the site.

Elevation, Topography, and Soils

The site elevation is 906 feet above mean sea level. The project site, underlain by alluvial deposits, is relatively flat and gradually slopes down to the northwest. When comparing the single-family residential units to the proposed project, there is a 60 to 70-foot elevation difference located on the southern and western portions of the site. The majority of the project site is mapped with Saugus sandy loam (30–50 percent slopes), San Emigdio fine sandy loam (0–2 percent slopes), and Tujunga gravelly loamy sand (0–9 percent slopes). The western and southern edges are mapped with Monserate sandy loam, 2–9 percent slopes (Google Earth 2016). Despite the site being significantly disturbed, soils observed on the site appeared relatively consistent with these designations. Soils observed during the survey included granite cobble, gravelly loam in the north, and sandy loam in the south. The soils map is attached as Figure 3.

Vegetation and Disturbance

Despite the significant site disturbance, the habitat is of fair quality. The land had been previously disked and graded. Vegetation consists primarily of non-native annual grasses and exotic mustard. The site is normally unvegetated but, with the wet winter, it is now covered with dense, weedy vegetation. This area is dominated by mouse barley (*Hordeum murinum*), wild oat species (*Avena* sp.), Sahara mustard (*Brassica tournefortii*), western tansy-mustard (*Descurainia pinnata*), redstem stork's bill (*Erodium cicutarium*), ripgut grass (*Bromus diandrus*), and red brome (*Bromus madritensis* ssp. *rubens*). There are small areas of Riversidean sage scrub dominated by brittlebrush (*Encelia farinosa*) along and at the base of the western boundary slopes. Castor bean (*Ricinus communis*) is the most common plant along the northern site boundary, which borders the Santa Ana River. Figure 4 depicts the various vegetation and communities observed at the site. Refer to Figures 4a through 4c for site photographs. A complete list of plant species observed on the site is attached as Table A.

Wildlife

A few wildlife species common to urban and disturbed areas were observed during the field survey. Observed species include mourning dove (*Zenaida macroura*), killdeer (*Charadrius vociferus*; nesting pair), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), and raccoon (*Procyon lotor*). California ground squirrels (*Spermophilus beecheyi*) were abundant throughout the

site, along with numerous scattered active burrow clusters. An active raptor or crow nest was found on an electrical tower adjacent to the western boundary. Several cavities with bird whitewash were found in the bluff faces along the western and southern boundary. Refer to Site Photograph 6. These cliff cavities are possibly used by bats or birds, such as swallows and owls. A complete list of wildlife species observed is attached as Table A.

Jurisdictional Waters

All wetland areas, wetland buffer areas, and nonwetland waters of the U.S. are considered sensitive. Jurisdictional waters of the U.S. and State of California, including wetlands, are regulated by the United States Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB), pursuant to Sections 404 and 401 of the Federal Clean Water Act, respectively. Jurisdictional waters that also qualify as streams, lakes, or riparian habitat are regulated by the CDFW pursuant to Section 1602 of the California Fish and Game Code. Isolated waters, including wetlands that do not have a significant nexus to a traditional navigable water, are typically not subject to USACE jurisdiction; however, they are still regulated by the RWQCB (under the Porter-Cologne Water Quality Control Act) and also regulated by CDFW for those features that qualify as streams, lakes, or associated riparian habitat.

No jurisdictional waters occur on site. The site contains an unvegetated area near the western boundary where storm water runoff flows down from adjacent slopes via corrugated polyvinyl chloride (PVC) pipes or flumes. Two brow ditches on the southwestern boundary connect to corrugated PVC pipes that are intended to prevent erosion of the slope; the discharge from these pipes flows onto the site. Erosional features created from runoff are found near the base of these pipes and flumes. These features are formed by water flow during significant runoff events such as rain storms. Water flow is slowed by a bed of gravel at the base of the pipes or flumes and then flows onto flat ground, thereby creating small erosional features, before dissipating as sheet flow. Such features do not have the capacity to flow into the Santa Ana River or its tributaries and are therefore nonjurisdictional. Surface runoff from the Santa River Trail is directed to a v-ditch along the northern boundary. An opening in a La Cadena Drive curb allows runoff from the road into the southeast corner of the project. Neither of these water sources creates jurisdictional waters on the project site, since they exist in upland areas, do not flow off site, and are considered roadside ditches that do not function as wildlife habitat.

CEQA COMPLIANCE

Adopted Habitat Conservation Plans

The City of Colton's General Plan (1987) does not have a Natural Communities Conservation Plan (NCCP); however, the City has adopted the "Draft West Valley Habitat Conservation Plan" for the Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*; DSF). The proposed project is not within the West Valley Habitat Conservation Plan. The site is located approximately 1.8 miles southeast of the Habitat Conservation Plan Area and approximately 2.03 miles southeast of the 13.3-acre DSF established conservation area between Eucalyptus Avenue and Meridian Avenue.

Threatened and Endangered Species

There is no potential for threatened or endangered species to inhabit the project site. In the southwestern area of San Bernardino County, there have been some listed species reported in CNDDDB (CDFW 2016; Figure 6) over the years. Occurrences for the federally-listed endangered DSF have been reported in the area, but the site lacks the necessary Delhi sands and dunes. One occurrence for the federally-listed threatened and State-listed endangered western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) was reported in the Santa Ana River approximately 1.73 miles northeast of the site, but this occurrence was reported in 1930 and western yellow-billed cuckoo no longer inhabits the region. Occurrences for the federally and State-listed endangered least Bell's vireo (*Vireo bellii pusillus*) have been reported approximately 0.67 mile west of the site. Occurrences for western yellow bat (*Lasiurus xanthinus*) are located approximately 0.15 mile east of the project site.

The site is not within designated critical habitat of any species. Refer to Figure 5 for a map of Federal Critical Habitat. The nearest critical habitats are for the federally-listed threatened coastal California gnatcatcher (*Poliophtila californica californica*) adjacent to the western boundary; the federally-listed threatened Santa Ana sucker (*Catostomus santaanae*) in the Santa Ana River; and the federally-listed endangered southwestern willow flycatcher (*Empidonax traillii extimus*) in the associated Santa Ana River riparian habitat north of the project site.

The project site does not contain any San Bernardino kangaroo rat (*Dipodomys merriami parvus*; SBKR) habitat elements described in the Federal Register such as sandy loamy soils, Riversidean alluvial fan sage scrub, or seasonal flooding (USFWS 2007). Although adjacent to the Santa Ana River, the project site is isolated by levee, bike trail, and non-native shrub vegetation (castor bean and tree tobacco [*Nicotiana glauca*]). The project is unlikely to be occupied by SBKR; therefore, impacts to the species habitat will not occur.

Other Special-Status Species

No substantial project impacts to other special-status species are anticipated. No burrowing owls (*Athene cunicularia*) were observed on or adjacent to the site. The project site vegetation is too tall for burrowing owl habitat suitability and there are numerous utility poles that would increase the risk of owl mortality from larger predatory raptors. The land in the current condition has low habitat function and value for listed and other species of special concern. Because the proposed project site is graded and maintained to reduce fire risk, is surrounded by existing development, has low habitat quality, and is small relative to the areas of suitable habitat in the region, impacts to burrowing owl and other special-status species would not be considered significant. There is evidence of roosting or nesting by other birds from white wash at the entrances of cavities observed in the western and southern boundary bluffs (Figure 4b). If the bluffs will be altered or stabilized, then a pre-construction nesting survey is recommended prior to ground disturbance and vegetation removal.

Wildlife Movement, Corridors, and Nursery Sites

The project site is not in a wildlife corridor and does not contain nursery sites. The project would not limit wildlife movement along the Santa Ana River, but would reduce local movement from upland

areas to the river across the project site. Wildlife movement would be limited to roads, sidewalks, easements, cliffs, and landscaping between structures and along fence rows.

Sensitive Natural Communities

There are no sensitive natural communities on the project site. The Riversidean sage scrub (brittlebush) is located in previously disturbed road cut along Tropica Ranch Road. The open areas are disturbed and dominated by exotic herbaceous, shrub, and tree species.

Wetlands

The project site does not contain any natural drainages, riparian resources, or wetlands that would be subject to the jurisdiction of the Federal or State agencies listed above. Therefore, there are no impacts relative to any wetland or related areas.

Local Policies and Ordinances Protecting Biological Resources

Besides the Draft West Valley Habitat Conservation Plan for DSF, the City of Colton does not have any additional adopted policies or ordinances protecting biological resources. The project area is not within the Habitat Conservation Plan area and, therefore, will not conflict with local policies or ordinances applicable to biological resources.

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. The site is adjacent to critical habitat for coastal California gnatcatcher, southwestern willow flycatcher, and Santa Ana sucker. However, the adjacent habitat does not contain the required Riversidean Alluvial Fan Sage Scrub for SBKR; does not have quality coastal sage scrub habitat for the coastal California gnatcatcher; does not have dense riparian habitat suitable for the southwestern willow flycatcher; and lacks perennial water in this reach of the Santa Ana River for the Santa Ana sucker (USFWS 2007; 2013; 2010). Therefore, substantial indirect impacts on sensitive biological resources are not anticipated.

Recommended Mitigation Measures

The project site contains trees and shrubs along south La Cadena Drive that have the potential to house nesting birds. The Migratory Bird Treaty Act (MBTA) prohibits disturbance or destruction of active nests during the avian nesting season of February 15 through September 15 (January 15 to August 31 for raptors). On-site nesting habitat may be directly affected by proposed project activities. Tree removal or increased noise during construction activities may cause birds to abandon nests or negatively affect nestlings. In order to avoid potential impacts to nesting birds, the CDFW recommends construction activities within 100 feet (300 feet for raptors) of trees and shrubs be scheduled outside of the avian nesting season.

BIO-1: Nesting Birds

If vegetation removal or construction activities must occur during the nesting season, a pre-construction nesting bird survey will be conducted by a qualified biologist three days before disturbance activities; the results will be submitted to the City of Colton. All observed active nests

will be flagged and a buffer of 100 feet (300 feet for raptors), or as determined appropriate by the biologist, will be established. This buffer area will be free of disturbance until the nesting cycle is complete. Active nests and their associated buffer zones will be flagged, delineated on maps, and delivered to the City Planning Department. These mitigation measures will ensure that potential impacts to nesting bird species will be less than significant.

BIO-2: Burrowing Owl

If deemed necessary, a pre-construction burrowing owl survey would be conducted no less than 14 days prior to ground disturbance activities and in accordance with the *2012 Staff Report on Burrowing Owl Mitigation* (CDFG 2012). Avoidance and minimization measures are dependent on confirmed owl presence. The site currently contains vegetation that is too tall for habitat suitability; therefore, there is low potential for wintering or breeding. However, annual fire abatement activities have the potential to remove vegetation or decrease vegetation to six inches in height or less, thus creating suitable habitat burrowing owls. A pre-construction survey will determine whether burrowing owls are present and determine if there are any active burrows. If survey results are positive, all burrowing owl sightings, occupied burrows, burrows with owl sign, and foraging areas (if known) will be mapped. Burrowing owls have the potential to re-colonize after only a few days. Time lapses between surveys and construction activities may trigger subsequent take avoidance surveys including, but not limited to, a final survey conducted 24 hours prior to ground disturbance.

BIO-3: Indirect Effects to Adjacent Natural Areas and Federal Critical Habitat

The project design will include infrastructure to minimize developmental and human intrusion into the adjacent riverine and upland habitat areas. These project features include the following list:

1. Shielded lighting on the outside of the buildings and parking lots to direct lighting to inside of the facility and away from the adjacent natural areas.
2. The facility will be fenced along the northern property boundary.
3. If night operations occur, then the fence design will block vehicle lights from flooding into the riverine area.
4. Trash receptacles will be available in the parking areas and adjacent to the buildings.

Cumulative Effects

The project will be constructed in vacant and previously disturbed land within rural residential area of Colton. Development of the site will reduce the amount of non-native grassland in the area used for foraging, limit wildlife dispersal into hills and river, eliminate live-in habitat for common wildlife species, and increase potential for runoff into the Santa Ana River from increase impervious surface area runoff. This project along with any other future higher residential or commercial projects on the adjacent land could cumulatively reduce the openness of the hillside, riverine, and rural areas along La Cadena Drive and Tropica Ranch Road. Alternatively, the project may not facilitate additional development, if the adjacent land use continues to remain as currently zoned.

If you require any additional information, please contact me by phone at (951) 781-9310 or by email at maria.lum@lsa.net.

Sincerely,

LSA ASSOCIATES, INC.



Maria A. Lum, M.S.
Associate/Biologist

Attachments: References
 Table A: Plant and Animal Species Observed
 Figure 1: Regional and Project Location
 Figure 2: Aerial Project Study Area
 Figure 3: Soils Map
 Figure 4: Vegetation and Photograph Location Key Map
 Figures 4a through 4c: Site Photographs
 Figure 5: Critical Habitat

REFERENCES

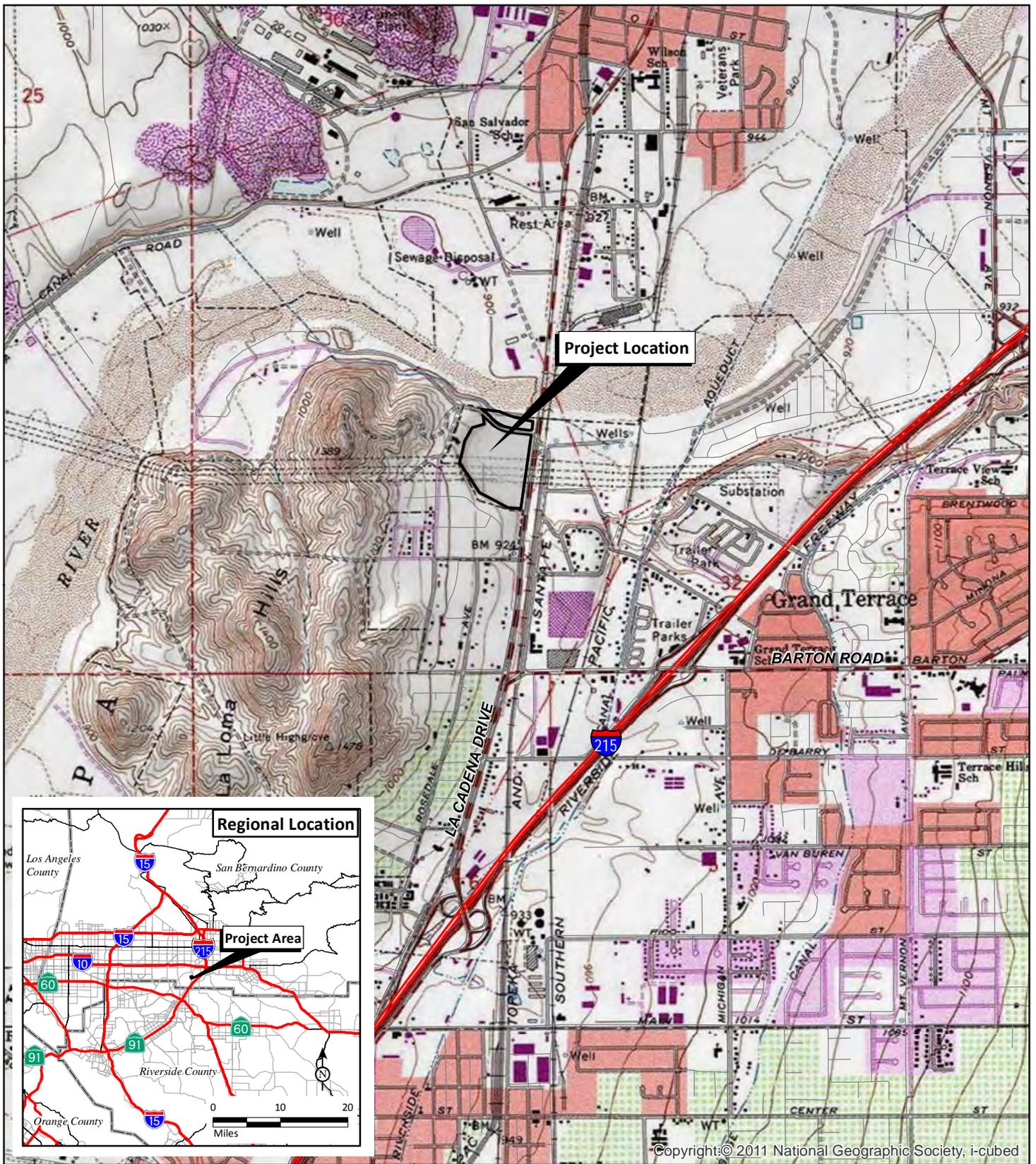
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- USFWS. 2007. 50 CFR Part 17 RIN 1018-AV38 Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the Coastal California Gnatcatcher (*Polioptila californica californica*).
- USFWS. 2010. 50 CFR Part 17 [FWS-R8-ES-2009-0072; 92210-1117-0000-B4] RIN 1018-AW23 Endangered and Threatened Wildlife and Plants; Revised Critical Habitat for Santa Ana Sucker; Final Rule.
- USFWS. 2013. 50 CFR Part 17 [FWS-R2-ES-2011-0053; 4500030114] RIN 1018-AX43 Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for Southwestern Willow Flycatcher; Final Rule.
- United States Geological Service (USGS). 1980. *San Bernardino South, California* USGS 7.5-minute quadrangle. Denver, Colorado.

Table A: Plant and Animal Species Observed at the Colton Tropica Warehouses Project

Scientific Name	Common Name
MAGNOLIOPHYTA: MAGNOLIOPSIDA	DICOT FLOWERING PLANTS
Adoxaceae	Muskroot Family
<i>Sambucus nigra</i> ssp. <i>caerulea</i>	Blue elderberry
Anacardiaceae	Sumac Family
<i>Schinus molle</i> (non-native species)	Peruvian pepper tree
Asteraceae	Sunflower family
<i>Ambrosia psilostachya</i>	Western ragweed
<i>Artemisia californica</i>	California sagebrush
<i>Baccharis salicifolia</i> ssp. <i>salicifolia</i>	Mule fat
<i>Centaurea melitensis</i> (non-native species)	Tocalote
<i>Encelia farinosa</i>	Brittlebrush
<i>Matricaria chamomilla</i>	Pineapple weed
Brassicaceae	Mustard family
<i>Brassica tournefortii</i> (non-native species)	Sahara mustard
<i>Descurainia pinnata</i>	Western tansy-mustard
<i>Hirschfeldia incana</i> (non-native species)	Shortpod mustard
Euphorbiaceae	Spurge Family
<i>Croton setigerus</i>	Doveweed
<i>Ricinus communis</i> (non-native species)	Castor bean
Fabaceae	Pea family
<i>Acmispon glaber</i>	Coastal deerweed
<i>Medicago polymorpha</i> (non-native species)	Common burclover
<i>Parkinsonia aculeate</i> (non-native species)	Palo verde
Geraniaceae	Geranium family
<i>Erodium cicutarium</i> (non-native species)	Redstem stork's bill
Lamiaceae	Mint Family
<i>Marrubium vulgare</i> (non-native species)	Horehound
Malvaceae	Mallow Family
<i>Malva parviflora</i> (non-native species)	Cheeseweed
Platanaceae	Sycamore Family
<i>Platanus racemosa</i>	California sycamore
Simaroubaceae	Simarouba Family
<i>Ailanthus altissima</i> (non-native species)	Tree of heaven
Solanaceae	Nightshade Family
<i>Nicotiana glauca</i> (non-native species)	Tree tobacco
MAGNOLIOPHYTA: LILIOPSIDA	MONOCOT FLOWERING PLANTS
Poaceae	Grass family
<i>Avena</i> sp. (non-native species)	Wild oat species
<i>Bromus diandrus</i> (non-native species)	Ripgut grass
<i>Bromus madritensis</i> ssp. <i>rubens</i> (non-native species)	Red brome
<i>Hordeum murinum</i> ssp. <i>leporinum</i> (non-native species)	Mouse barley

Table A: Plant and Animal Species Observed at the Colton Tropica Warehouses Project

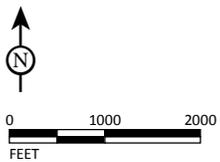
Scientific Name	Common Name
INSECTS	
Pepsinae	Spider Wasps
<i>Pepsis</i> sp.	Tarantula wasp sp.
<i>Pieridae</i>	Whites and Sulphurs (Butterflies)
<i>Anthocharis sara</i>	Sara orangetip
BIRDS	
Accipitridae	Hawks, Kites, Eagles, and Allies
<i>Buteo jamaicensis</i>	Red-tailed hawk
Aegithalidae	Long-Tailed Tits and Bushtits
<i>Psaltriparus minimus</i>	Bushtit
Falconidae	Caracaras and Falcons
<i>Falco sparverius</i>	American kestrel
Charadriidae	Plovers and Lapwings
<i>Charadrius vociferus</i>	Killdeer
Columbidae	Pigeons and Doves
<i>Zenaida macroura</i>	Mourning dove
Corvidae	Crows and Jays
<i>Corvus brachyrhynchos</i>	American crow
Emberizidae	Emberizids
<i>Melospiza crissalis</i>	California towhee
<i>Zonotrichia leucophrys</i>	White-crowned sparrow
Fringillidae	Fringilline and Cardueline Finches and Allies
<i>Spinus psaltria</i>	Lesser goldfinch
Icteridae	Blackbirds
<i>Icterus</i> sp.	Oriole sp.
Mimidae	Mockingbirds and Thrashers
<i>Mimus polyglottos</i>	Northern mockingbird
Sylviidae	Sylviid Warblers
<i>Chamaea fasciata</i>	Wrentit
Trochilidae	Hummingbirds
<i>Calypte anna</i>	Anna's hummingbird
Troglodytidae	Wrens
<i>Thryomanes bewickii</i>	Bewick's wren
Tyrannidae	Tyrant Flycatchers
<i>Tyrannus</i> sp.	Kingbird sp.
MAMMALS	
Procyonidae	Raccoons and Allies
<i>Procyon lotor</i>	Raccoon
Sciuridae	Squirrels
<i>Spermophilus beecheyi</i>	California ground squirrel



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FIGURE 1

LSA



SOURCE: USGS 7.5' Quad: San Bernardino South (1980), CA; ESRI Streetmap, 2013.

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Colton Tropica Warehouses Project
 Biological Resources
 Regional and Project Location



FIGURE 2

LSA

LEGEND

 Project Boundary



0 100 200
FEET

SOURCE: Google Earth, 2016

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Colton Tropica Warehouses Project
Biological Resources
Aerial Project Study Area



FIGURE 3

LSA

LEGEND

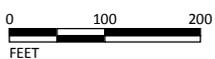
 Project Boundary

Soils

-  MoC: Monserate sandy loam, 2 - 9 % slopes
-  ScA: San Emigdio fine sandy loam, 0 - 2 % slopes
-  ShF: Saugus sandy loam, 30 - 50 % slopes
-  TvC: Tujunga gravelly loamy sand, 0 - 9 % slopes

Colton Tropica Warehouses Project
Biological Resources

Soils Map



SOURCE: Google Earth, 2016; Soil Data Mart, 2015.

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FIGURE 4

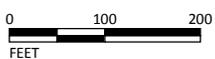
LSA

LEGEND

- Project Boundary
- Photograph Location

Vegetation

- Annual (Non-Native) Grassland
- Blue Elderberry
- California Sycamore
- Castor Bean
- Palo Verde
- Riversidian Sage Scrub



SOURCE: Google Earth, 2016

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Colton Tropica Warehouses Project
 Biological Resources
 Vegetation and
 Photograph Location Key Map



Photograph 1: *Panoramic view from center of western side of project site.*



Photograph 2: *View of raptor nest in transmission tower.*



Photograph 3: *View of Palo Verde trees below curb and gutter drain.*

LSA

FIGURE 4A

*Colton Tropica Warehouses Project
Biological Resources*

Site Photographs



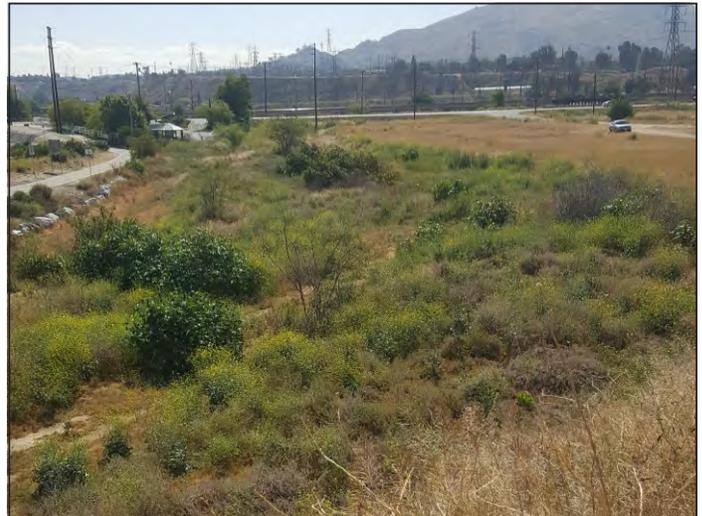
Photograph 4: *View of northern half of project site with dense annual vegetation.*



Photograph 5: *View of annual grassland vegetation from center of eastern side of project site.*



Photograph 6: *View of white wash on ledges near large cavities in cliff side which were visible from ground.*



Photograph 7: *View of Castor Bean along v-ditch adjacent to Santa Ana River trail.*



Photograph 8: *View of field located north of Tropica Ranch Road.*



FIGURE 5

LSA

LEGEND

- Project Boundary
- Critical Habitat**
- Coastal California Gnatcatcher
- Santa Ana Sucker



0 100 200
FEET

SOURCE: Google Earth, 2016

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Colton Tropica Warehouses Project
Biological Resources
Critical Habitat