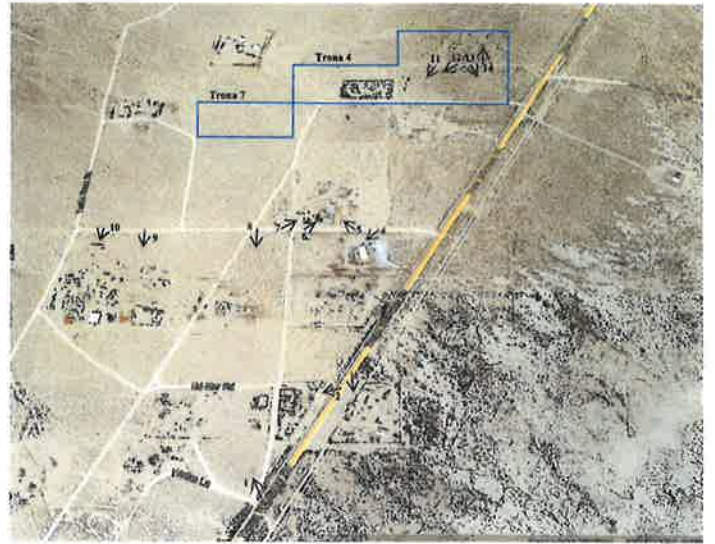


APPENDIX A



1



2



3



4



5



6



7



8



9



10



11



12



13



14

APPENDIX B

BIOLOGICAL RESOURCE EVALUATION

VALLEY WIDE CONSTRUCTION SERVICES TRONA 4 AND 7 SOLAR PROJECT



MAY 2023



BIOLOGICAL RESOURCE EVALUATION

TRONA 4 AND 7 SOLAR PROJECT

Prepared for:

Valley Wide Construction Services
82740 Trona Road
Trona, CA 93562
Contact Person: Robbie Barker

Consultant:



5080 California Avenue, Suite 220
Bakersfield, CA 93309
Contact: Jaymie Brauer
Phone: (661) 616-2600

May 2023

TABLE OF CONTENTS

<i>Table of Contents</i>	<i>i</i>
<i>Executive Summary</i>	<i>1</i>
SECTION 1 - Introduction	1
1.1 - Project Location.....	1-1
1.2 - Project Description.....	1-1
1.3 - Purpose, Goals, and Objectives for this Report.....	1-1
SECTION 2 - Methods	2-3
2.1 - Definition of Biological Study Area	2-3
2.2 - Literature Review and Database Analysis.....	2-3
2.3 - Reconnaissance-Level Field Surveys.....	2-5
SECTION 3 - Environmental Setting	3-6
3.1 - Topography	3-6
3.2 - Climate.....	3-6
3.3 - Land Use	3-6
3.4 - Soils	3-7
3.5 - Hydrology.....	3-7
3.6 - General Biological Conditions	3-10
SECTION 4 - Findings	4-10
4.1 - Sensitive Natural Communities	4-10
4.1.1 - Results of Literature Review and Database Searches.....	4-10
4.1.2 - Presence of Sensitive Natural Communities.....	4-10
4.2 - Special-Status Plants.....	4-10
4.2.1 - Results of Literature Review and Database Searches.....	4-10
4.2.2 - Presence of Special-Status Plants	4-11
4.3 - Special-Status Wildlife	4-11
4.3.1 - Results of Literature Review and Database Searches.....	4-11
4.3.2 - Presence of Special-Status Wildlife	4-12
4.3.3 - Nesting Migratory Birds and Raptors	4-14
4.4 - Critical Habitat, Movement Corridors, and Linkages	4-14
4.4.1 - Presence of Critical Habitat.....	4-14
4.4.2 - Presence of Movement Corridors and Linkages	4-14
4.5 - Wetlands and Other Waters.....	4-14
SECTION 5 - Potential Project Impacts	5-16
5.1 - Potential Impacts to Sensitive Vegetation Communities.....	5-16

5.2 - Potential Impacts to Special-Status Plant Species.....	5-16
5.3 - Potential Impacts to Special-Status Wildlife Species	5-16
5.4 - Potential Impacts to Nesting Birds and Raptors.....	5-16
5.5 - Potential Impacts to Critical Habitat, Movement Corridors and Linkages	5-17
5.5.1 - Potential Impacts to Critical Habitat	5-17
5.5.2 - Potential Impacts to Movement Corridors and Linkages	5-17
5.6 - Potential Impacts to Wetlands and Waters	5-17
SECTION 6 - Recommendations	6-18
SECTION 7 - Summary and Conclusions.....	7-20
SECTION 8 - References.....	8-21

Appendices

Appendix A	CNDDDB, CNPS, and IPaC Database Results
Appendix B	Representative Photographs
Appendix C	Plants and Wildlife Species Observed On-Site

List of Figures

Figure 1-1 Regional	1-1
Figure 1-2 Project Location.....	1-2
Figure 2-1 Biological Study Area.....	2-4
Figure 3-1 NWI and NHD Records of Aquatic Resources	3-8
Figure 3-2 FEMA Flood Zone Map	3-9
Figure 4-1 Mapped Critical Habitat in the Project Vicinity.....	4-15

List of Tables

Table 3-1 Field Survey Personnel and Timing.....	3-6
Table 4-1 Special-Status Plant Species Occurring in the Region of the BSA	4-11
Table 4-2 Special-Status Wildlife Species Occurring in the Region of the BSA (Source: CNDDDB 2023, and USFWS 2023).....	4-12
Table 6-1 Disturbance Buffers for Desert Kit Fox Dens	6-18

EXECUTIVE SUMMARY

This Biological Resource Evaluation (BRE) report provides the results of a biological survey conducted by QK for the Trona 4 and 7 Solar Projects (collectively, the Project) proposed by Valley Wide Construction Services. In order to comply with the California Environmental Quality Act (CEQA) a biological evaluation was conducted to identify the potential for sensitive biological resources to occur on or near the Project site.

The Project is located north of the unincorporated town of Trona, California (Figure 1-1). It consists of two separate applications for renewable energy permits, one covering approximately 15 acres (Trona 4) and the other covering approximately 5 acres (Trona 7) of contiguous land, all situated on Assessor Parcel Numbers (APNs) 038-330-32, 038-330-33, 038-330-34, and 038-330-46. The Project site, which for the purposes of this BRE consists of both the Trona 4 and Trona 7 project sites, is highly disturbed, has been disked and exhibits little native vegetation re-growth. The Project site is bordered by an existing solar facility to the south, scattered residential homes, abandoned vehicles, local trash and debris.

A review of available literature and agency databases was conducted to obtain information of the occurrences of natural communities, special-status plant and wildlife species known or have the potential to occur in the vicinity of the Project site. QK conducted a biological reconnaissance survey on May 8, 2023, to determine the locations and extent of current land use, natural vegetation communities, determine the potential for occurrences of special-status plant and wildlife species, and verify the presence or absence of wetlands and State and or federal jurisdictional waters.

No special-status plant species or special-status wildlife species, or diagnostic sign thereof, were observed during the survey, and one water feature, that intersects the Project site, was identified by the National Hydrology Database and National Wetlands Inventory databases.

Based on the literature and database search and the results current conditions of the survey, it was deemed that there is a potential for two special-status wildlife species to occur on the Project site: the desert kit fox (*Vulpes macrotis arsipus*), and foraging and nesting birds and raptors. Desert kit fox were not observed to be inhabitants on the Project site but may pass through as transients. There is a potential for nesting migratory birds and other raptors species, protected by the Migratory Bird Treaty Species Act, to occur on or near the Project site and surrounding areas. With the implementation of Best Management Practices and recommended avoidance measures, impacts during the construction of the Project are not expected or will be limited to special-status wildlife species and migratory birds and raptors. There is expected to be no impact to special-status plant species, sensitive natural communities, wetlands or water features, or any other sensitive biological resources. No operational impacts would occur because operations are passive and involve no ongoing land disturbance.

SECTION 1 - INTRODUCTION

Valley Wide Construction Services proposes to construct and operate two solar facilities: Trona 4 is a 3 megawatt (MW) photovoltaic (PV) solar facility on approximately 15 acres; and Trona 7 is a 1 MW PV solar facility on approximately 5 acres located in Trona, Inyo County, California. For the analysis presented herein, the two contiguous sites have been combined into a single, 20-acre site for ease of discussion (Figures 1-1 and 1-2). The proposed solar project (Project) will include the vegetation removal, grading, trenching, and associated infrastructure to build the solar project. The Project would connect to the existing Southern California Edison (SCE) 33-kV transmission line that bisects the Project. To comply with the California Environmental Quality Act (CEQA), a biological evaluation was conducted to identify the potential for sensitive biological resources to occur on or near the Project site. This Biological Resource Evaluation (BRE) provides the basic biological information needed for the County of Inyo CEQA permitting process.

1.1 - Project Location

The Project is located north of the town of Trona, California (Figure 1-1). It covers approximately 20 acres and is situated on Assessor Parcel Numbers (APNs) 038-330-32, 038-330-33, 038-330-34 (Trona 4), and 038-330-46 (Trona 7). The unincorporated town of Trona is located on the east side of the Searles Valley and is between the Panamint Range and Southern Sierra Mountain Range, and approximately 28-miles northeast of the City of Ridgecrest. The Project site is west of Trona Wildrose Road and south of Moses Lane (Figure 1-2). It is in the northeast $\frac{1}{4}$ of Section 32, Township 24 South, Range 43 East, Mount Diablo Base and Meridian, and is within the *Trona East*, California U.S. Geological Survey (USGS) 7.5-minute quadrangle.

1.2 - Project Description

The proposed Trona 4 Project will construct and operate a 3 MW PV solar facility on approximately 15 acres. The Project would install approximately 4,835 single-axis tracker solar panels on the site. The layout of the single axis tracker solar panels will be in an east-west direction. The maximum height of the would be up to 12 feet above grade at the beginning and end of each day. Each solar panel would be attached to embedded piers using a support structure. Module layout and spacing is typically optimized to balance energy production versus peak capacity and depends on the sun angles and shading due to the surrounding horizon of the site.

The proposed Trona 7 Project will construct and operate a 1 MW PV solar facility on approximately 5 acres. The Project would install approximately 2,300 single-axis tracker solar panels on the site.

1.3 - Purpose, Goals, and Objectives for this Report

The BRE report includes the results of a biological reconnaissance survey and available biological and natural resource database search conducted by QK biologists at the Project

site. This report is consistent with the requirements for an analysis of impacts to biological resources.

The primary focus of this report is to provide information about the presence of sensitive biological resources on the Project and develop measures to avoid and minimize any potential impacts of the Project on those resources. To accomplish that goal, this BRE provides information on the condition and sensitivity of the sensitive biological resources potentially present on and adjacent to the Project site and evaluates Project impacts to those resources. This BRE focuses on providing information and sensitive natural communities, special-status species, wildlife movement corridors, and wetlands and waters by conducting a desktop analysis of site conditions and verifying those findings with an on-site biological survey.

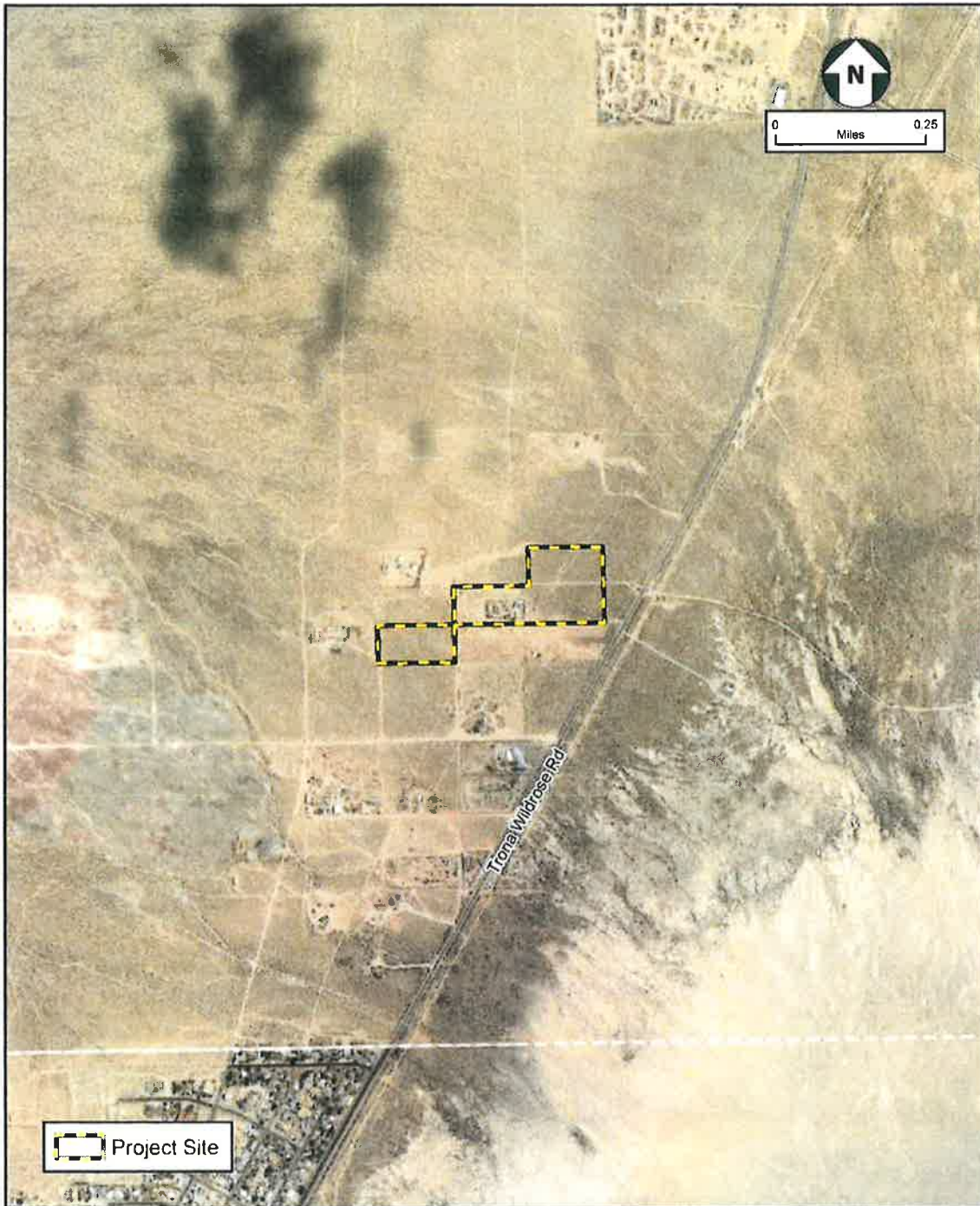


Figure 1-2
Project Location
Trona 4 and 7 Solar Project,
Inyo County, California



SECTION 2 - METHODS

2.1 - Definition of Biological Study Area

The Biological Study Area (BSA) includes the Project site and a 250-foot survey buffer surrounding the Project disturbance footprint (Figure 2-1).

2.2 - Literature Review and Database Analysis

The following sources were reviewed for information on special-status biological resources in the Project vicinity:

- California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB; CDFW 2023a).
- CDFW's Biogeographic Information and Observation System (BIOS; CDFW 2023b).
- CDFW's Special Animals List (CDFW 2023c).
- CDFW's California Wildlife Habitat Relationships (CWHR) System (Mayer and Laudenslayer 1988).
- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California (CNPS 2023).
- United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation System (IPaC; USFWS 2023a).
- USFWS Critical Habitat Mapper (USFWS 2023b).
- USFWS National Wetlands Inventory (NWI; USFWS 2023c).
- USGS National Hydrography Dataset (NHD; USGS 2023).
- Federal Emergency Management Agency (FEMA) flood zone maps (FEMA 2023).
- United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) Web Soil Survey (NRCS 2023a)
- Current and historical aerial imagery (Google LLC 2023; Netroline 2023).

The CNDDDB and CNPS queries focused on the *Trona East* USGS 7.5-minute quadrangle in which the Project is located, plus the surrounding eight quadrangles: *Copper Queen Canyon*, *Homewood Canyon*, *Manly Fall*, *Slate Range Crossing*, *Westend*, *Layton Spring*, *Seales Lake*, and *Trona West*. To satisfy other standard search criteria, CNDDDB records within a 10-mile radius of the project site were queried separately from the broader database search.

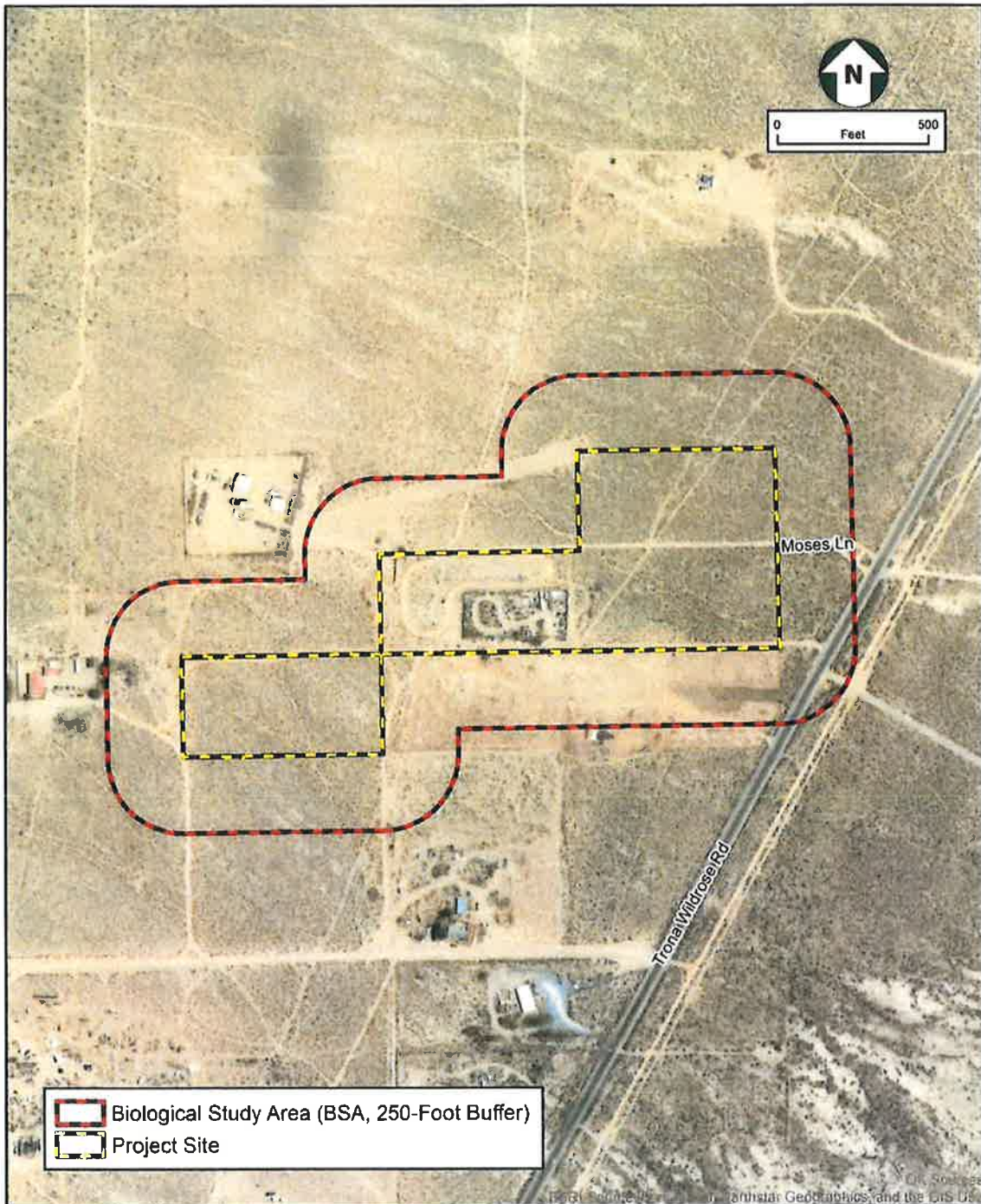


Figure 2-1
Biological Study Area
Trona 4 and 7 Solar Project,
Inyo County, California

The CNDDDB provides element-specific spatial information on individual documented occurrences of special-status species and sensitive natural vegetation communities. The CNPS database provides similar information, but at a much lower spatial resolution, for additional sensitive plant species tracked by the CNPS. The CDFW Special Animals List and USFWS IPaC provide no spatial data on wildlife occurrences and provide only lists of species potentially present. Wildlife species designated as “Fully Protected” by California Fish and Game Code Sections 5050 (Fully Protected reptiles and amphibians), 3511 (Fully Protected birds), and 4700 (Fully Protected mammals) are also included on the final list of evaluated species. The database search results can be found in Appendix A.

A review of the NWI was completed to identify whether wetlands have previously been documented on or adjacent to the Project site. The NWI, which is operated by the USFWS, is a collection of wetland and riparian maps that depicts graphic representations of the type, size, and location of wetland, deep water, and riparian habitats in the United States. In addition to the NWI, regional hydrologic information from the NHD was obtained from the USGS to evaluate the potential occurrence of blueline streams within or near the Project site.

Soils data were obtained from the USDA NRCS Web Soil Survey, climate information was obtained from the Western Regional Climate Center, and land use information was obtained from available aerial imagery (NRCS 2023a; WRCC 2023; Google LLC 2023). Information about flood zones was obtained from the Federal Emergency Management Agency, Department of Homeland Security (FEMA 2023).

The results of the database inquiries were reviewed to extract pertinent information on site conditions and evaluate the potential for sensitive biological resources to occur within or near the proposed Project site. Only those resources with the potential to be present and affected by the Project were included and considered in this document. The potential presence of natural communities and special-status species was based on distributional ranges overlapping the Project site and the presence of habitat and/or primary constituent habitat elements.

2.3 - Reconnaissance-Level Field Surveys

A biological reconnaissance survey of the BSA was conducted by QK Environmental Scientists Jeff Erway and Eric Madueno on May 8, 2023. The survey consisted of walking meandering pedestrian transects spaced 50 to 100 feet apart throughout the BSA, where accessible. Areas with suitable habitat that could not be accessed were surveyed by use of high-power binoculars.

Tasks completed during the survey included determining and documenting current land use, developing an inventory of plant species, wildlife species, and wildlife sign (e.g., scat, burrows, nests, feathers, tracks, etc.), characterizing vegetation associations and habitat conditions within the BSA, assessing the potential for federally, State-listed and other special-status plant and wildlife species that may occur on and near the Project site based on existing conditions, and assessing the potential for migratory birds and raptors to nest on and near the Project site. In addition, all historical wetland and water features documented

by NWI and NHD were field verified. All spatial data were recorded using Environmental Systems Research Institute (ESRI) Collector for ArcGIS software installed on an iPad. Site conditions were documented with representative photographs (Appendix B).

SECTION 3 - ENVIRONMENTAL SETTING

This section identifies the regional and local environmental setting of the Project and describes existing baseline conditions. The environmental setting of the BSA was obtained from various sources of literature, databases, and aerial photographs. Site conditions were verified and updated during the site reconnaissance survey conducted by QK Environmental Scientists (Table 3-1).

**Table 3-1
Field Survey Personnel and Timing**

Date	Personnel	Time	Weather Conditions	Temperature
05/08/2023	Jeff Erway, and Eric Madueno	0947 - 1045	Sunny, Clear	61 - 67°F

3.1 - Topography

The BSA is in the southwestern portion of Inyo County. The BSA is relatively flat with little variation in topography and an elevation of about 1,690 feet above mean sea level.

3.2 - Climate

The BSA is within an area that has a Mediterranean climate of hot summers and mild, wet winters. Average high temperatures range from 58.2°F in January to 105.5°F in July, with daily temperatures often exceeding 100°F several days in the summer (WRCC 2023). Average low temperatures range from 33.2°F in December to 73.3°F in July. Precipitation occurs primarily as rain, most of which falls from November to April, with an average of 3.94 inches of rainfall per year. Rain rarely falls during the summer months.

3.3 - Land Use

The Project site is located approximately 0.8-miles north of the unincorporated town of Trona, California and adjacent to the major public road known as Trona Wildrose Road. Currently, the Project site is highly disturbed from urbanization, previous disking, illegal trash and debris dumping, and by abandoned vehicles. The Project site is situated among scattered residential properties to the north and west, an existing solar facility to the south, Trona Wildrose Road to the east, and an unpaved road identified as Moses Lane to the north.

3.4 - Soils

The United States Department of Agriculture, Natural Resources Conservation Service (NRCS) Web Soil Survey database contains no digital data for the region the BSA is located.

3.5 - Hydrology

There is one record of a jurisdictional wetland feature within the BSA, as defined by the NWI (USFWS 2023c) (Figure 3-1). The jurisdictional wetland bisects a portion of the BSA, known as Trona 4, starting in the middle of the northwest area flowing southeast towards Trona Wildrose Road. The feature is described as an intermittent riverine. Features under the Riverine system include all wetlands and deepwater habitats contained within a channel, with two exceptions: 1) wetlands dominated by trees, shrubs, persistent emergent, emergent mosses, or lichens, and 2) habitats with water containing ocean-derived salts of 0.5 ppt or greater.

According to FEMA, the BSA is within an Area of Minimal Flood Hazard (Figure 3-2).

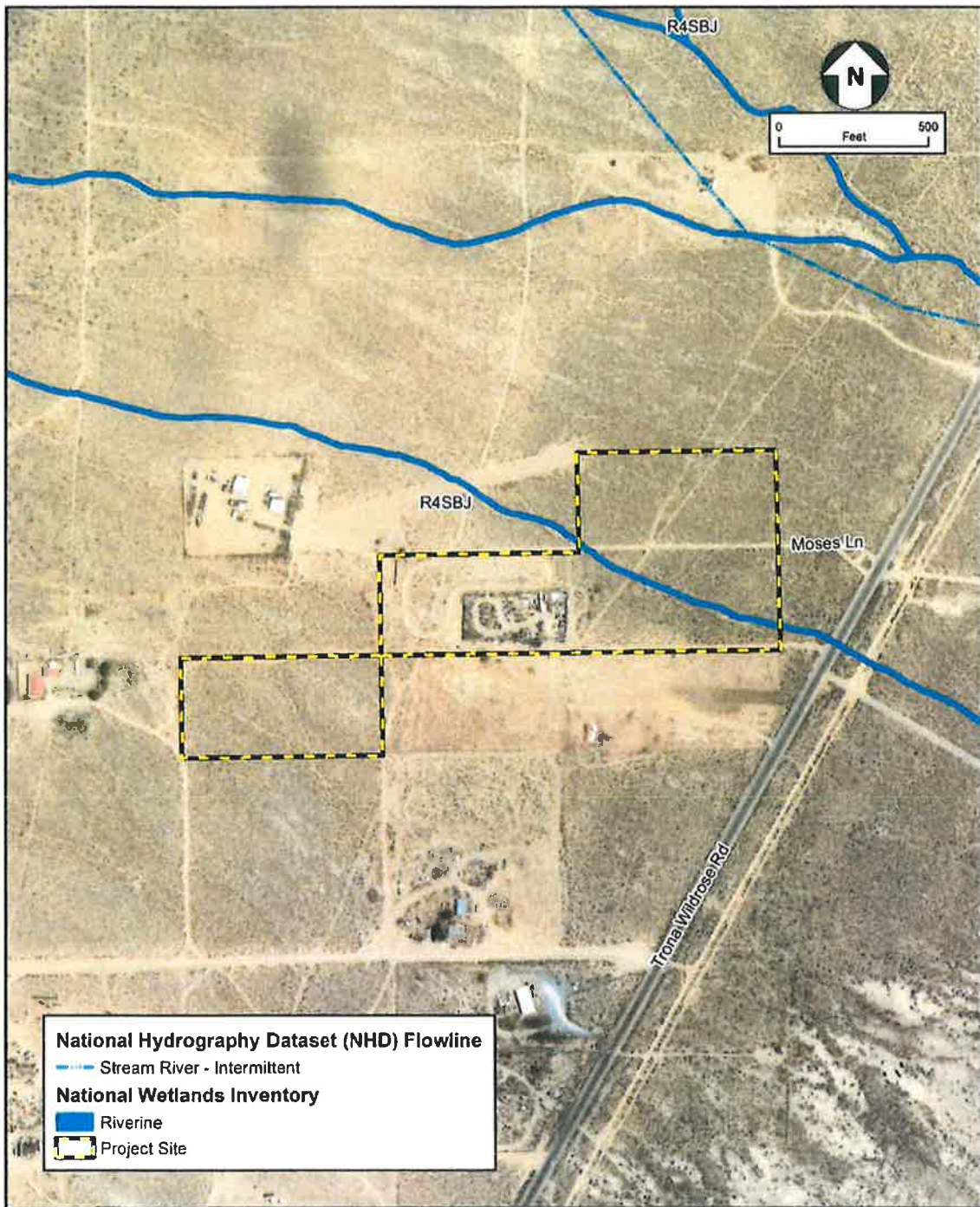


Figure 3-1
NWI and NHD Records of Aquatic Resources
Trona 4 and 7 Solar Project,
Inyo County, California

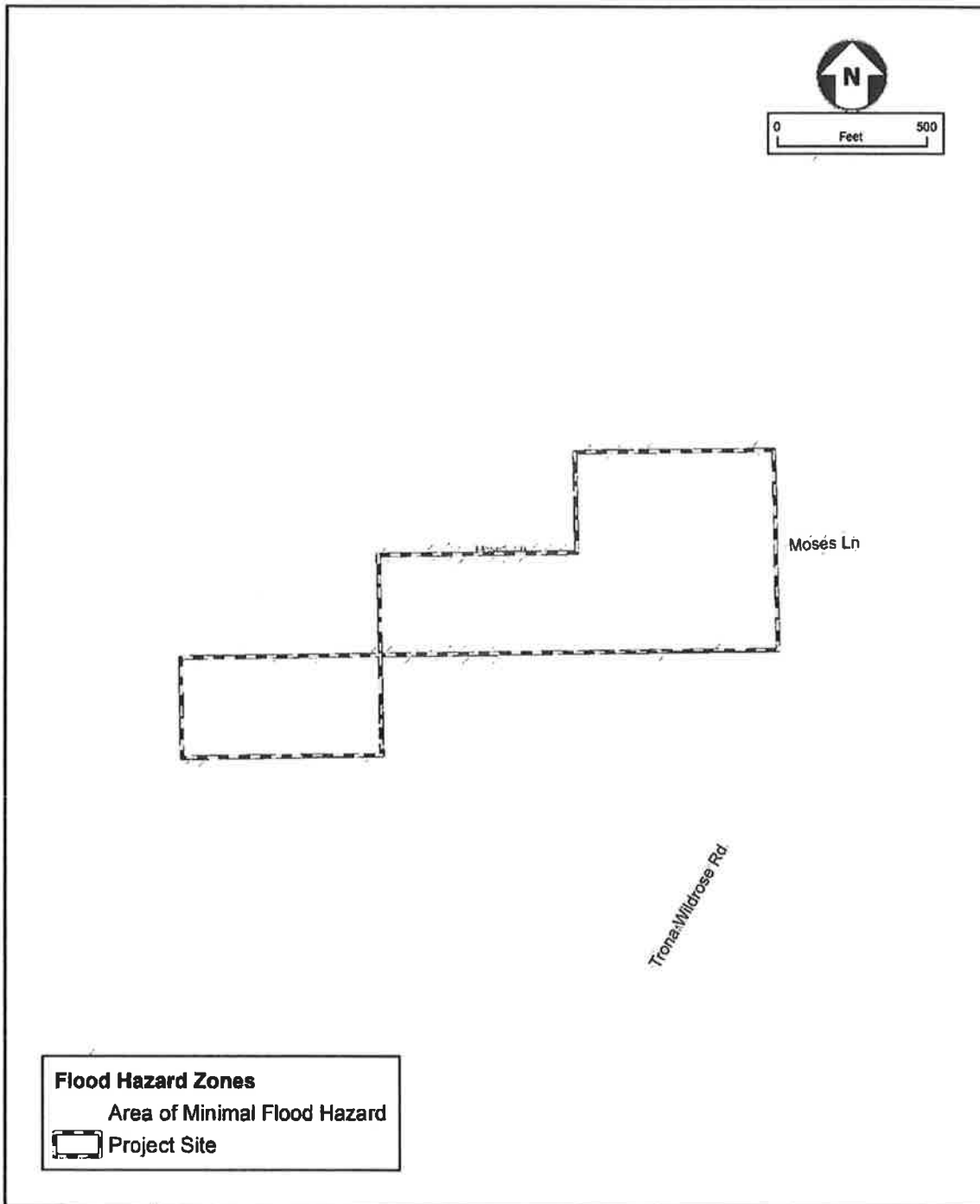


Figure 3-2
FEMA Flood Zone Map
Trona 4 and 7 Solar Project,
Inyo County, California

3.6 - General Biological Conditions

The entirety of the Project site consists of an open, previously disked desert and alkali desert scrub habitat that has been disturbed by urbanization and residential development. The Project site is bordered by scattered residential properties and Moses Lane to the north, and existing solar facility of the south, Trona Wildrose Road to the east, and scattered residential properties and open desert and alkali desert scrub habitat to the west.

No sensitive natural plant communities occur within the BSA. Vegetation observed included saltbush (*Atriplex polycarpa*), white bursage (*Ambrosia dumosa*), desert calico (*Loeseliastrum matthewsii*), desert five spot (*Eremalche rotundifolia*), and creosote (*Larrea tridentata*).

No avian nests were observed within the Project site, but the existing transmission and utility poles near the BSA could support nesting birds and/or raptors. A migratory bird species observed included common raven (*Corvus corax*).

No small mammal burrows, dens, or larger mammal dens that could be utilized by desert kit fox, Mohave ground squirrel (*Xerospermophilus mohavensis*) or desert tortoise (*Gopherus agassizii*) were observed within the BSA. A complete list of plant and wildlife species observed within the BSA during the biological reconnaissance survey is included in Appendix C.

SECTION 4 - FINDINGS

4.1 - Sensitive Natural Communities

4.1.1 - RESULTS OF LITERATURE REVIEW AND DATABASE SEARCHES

Literature results from the nine-quadrangle queries for the Project site were conducted and provide information for the potential of occurrence and verified during the field survey.

4.1.2 - PRESENCE OF SENSITIVE NATURAL COMMUNITIES

No sensitive natural vegetation communities were identified within the BSA. In addition, the BSA does not provide habitat that would support these communities.

4.2 - Special-Status Plants

4.2.1 - RESULTS OF LITERATURE REVIEW AND DATABASE SEARCHES

There were 7 special-status plant species identified in the literature and database review that are known or have the potential to occur within the nine-quadrangle queries centered on the Project site (Table 4-1). There are no CNDDDB records of special-status plant species that overlap the BSA.

**Table 4-1
Special-Status Plant Species Occurring in the Region of the BSA**

(Source: CNDDDB 2023, CNPS 2023,	Common Name	Status
<i>Aliciella ripleyi</i>	Ripley's Aliciella	2B.3
<i>Astragalus atratus</i> var. <i>mensanus</i>	Darwin Mesa milk-vetch	1B.1
<i>Castela emoryi</i>	Emory's crucifixion-thorn	2B.2
<i>Cryptantha clokeyi</i>	Clokey's cryptantha	1B.2
<i>Eremothera boothii</i> ssp. <i>boothii</i>	Booth's evening-primrose	2B.3
<i>Penstemon fruticiformis</i> var. <i>amargosae</i>	Amargosa beardtongue	1B.3
<i>Yucca brevifolia</i>	Joshua tree	SC

1A Presumed Extinct in California.

1B Rare, Threatened, or Endangered in California and elsewhere.

2A Plants presumed extirpated in California, but more common elsewhere.

2B Plants Rare, Threatened, or Endangered in California, but more common elsewhere.

CRPR Threat Code Extension:

.1 Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2 Fairly endangered in California (20-80% occurrences threatened)

.3 Not very endangered in California (<20% of occurrences threatened) Abbreviations:

Abbreviations:

FC Federal Candidate

FE Federal Endangered Species

FT Federal Threatened Species

SFP Fully Protected Animal, CDFW

SE California Endangered Species

ST California Threatened Species

SC California Candidate Species

SSC California Department of Fish and Game Species of Special Concern

4.2.2 - PRESENCE OF SPECIAL-STATUS PLANTS

No special-status plant species were observed within the BSA. The surveys coincided with some, but not all of the plant species' optimal blooming periods; however, none of the species identified in the database queries are expected to occur on-site due to the lack of suitable habitat conditions (disturbed site conditions, plant associations and soil types) and/or because the BSA is located outside of the species' known range. The Project site has been highly disturbed with urbanization and disking; however, a few native plant species have revegetated on site.

A complete list of plant species observed during the biological reconnaissance survey is included in Appendix C.

4.3 - Special-Status Wildlife

4.3.1 - RESULTS OF LITERATURE REVIEW AND DATABASE SEARCHES

There were 15 special-status wildlife species identified in the literature and database review that are known or have the potential to occur within the nine-quad search area centered on

the Project (Table 4-2). There is one historical CNDDDB record for prairie falcon (*Falco mexicanus*) that overlaps with the BSA.

Table 4-2
Special-Status Wildlife Species Occurring in the Region of the BSA
 (Source: CNDDDB 2023, and USFWS 2023)

Scientific Name	Common Name	Status
Invertebrates		
<i>Danaus plexippus</i>	monarch butterfly	FC, -
Reptiles		
<i>Elgaria panamintina</i>	Panamint alligator lizard	- , SSC
<i>Gopherus agassizii</i>	desert tortoise	FT, ST
Birds		
<i>Asio otus</i>	long-eared owl	- , SSC
<i>Athene cunicularia</i>	burrowing owl	- , SSC
<i>Charadrius nivosus nivosus</i>	western snowy plover	FT, SSC
<i>Falco mexicanus</i>	prairie falcon	- , WL
<i>Gymnogyps californianus</i>	California condor	FE, SE
<i>Pipilo crissalis eremophilus</i>	Inyo California towhee	FT, SE
<i>Toxostoma lecontei</i>	Le Conte’s thrasher	- , ST
Mammals		
<i>Antrozous pallidus</i>	pallid bat	- , SSC
<i>Corynorhinus townsendii</i>	Townsend’s big-eared bat	- , SSC
<i>Eumops perotis californicus</i>	western mastiff bat	- , SSC
<i>Ovis canadensis nelsoni</i>	desert bighorn sheep	- , FP
<i>Xerospermophilus mohavensis</i>	Mohave ground squirrel	- , FT
<i>Vulpes macrotis arsipus</i>	desert kit fox	- , FGC

Abbreviations:

- FC Federal Candidate
- FE Federal Endangered Species
- FGC Fish and Game Code
- FT Federal Threatened Species
- SFP Fully Protected Animal, CDFW
- SE California Endangered Species
- ST California Threatened Species
- SSC California Department of Fish and Game Species of Special Concern

4.3.2 - PRESENCE OF SPECIAL-STATUS WILDLIFE

There is no roosting habitat for monarch butterfly (*Danaus plexippus*) present within the BSA, although this species may travel through the BSA as a transient. Additionally, no milkweed (*Asclepias* sp.) was observed within the BSA, which is a required food source for larval monarch butterflies. No wetland, marsh, or riparian habitat exists within the BSA to support nesting or foraging Inyo California towhee (*Pipilo crissalis eremophilus*) or

Panamint alligator lizard (*Elgaria panamintina*) which inhabits riparian areas in the desert at the bottom of rocky canyons, near streams and springs.

No desert tortoise sign (e.g., scat, tracks, or burrows) were observed within the BSA. The nearest CNDDDB recorded occurrence (EONDX 110170) is approximately 1.2-miles north of the BSA (CDFW 2023a). The occurrence was for an adult desert tortoise crossing a dirt road in March 2017. The BSA is highly disturbed from disking, construction of an existing solar field, and urbanization (e.g., dirt roads and debris) from the residences in the vicinity. The disturbance in the vicinity has resulted in historical ground disturbance that results in no potential for foraging, or habitation of desert tortoise in the BSA.

There are no dense woodlands with coniferous or broadleaved trees near a water source that could provide suitable habitat for long-eared owl (*Asio otus*). Burrowing owl (*Athene cunicularia*) inhabit grassland, open bare ground, and utilize existing small mammal burrows, typically created by California ground squirrel, for breeding and shelter. There were no burrows or diagnostic sign (e.g., whitewash, tracks, prey remains) of burrowing owl observed within the BSA. Due to a lack of suitable burrows on site and highly disturbed condition of the site the likelihood of a resident burrowing owl on site is extremely unlikely.

No suitable foraging or nesting habitat is present within the BSA, due to the highly disturbed condition of the BSA, for western snowy plover (*Charadrius nivosus nivosus*), California condor (*Gymnogyps californianus*), prairie falcon, or Le Conte's thrasher (*Toxostoma lecontei*). The CNDDDB recorded occurrence (EONDX 26139), for prairie falcon, that overlaps with the BSA is from 1975 which is presumed extant. No additional data was recorded for this occurrence. There are no rocky outcroppings, mines or caves, cliff faces, tree hollows, buildings, or bridges within the BSA that would support the pallid bat (*Antrozous pallidus*), the western mastiff bat (*Eumops perotis californicus*), or the Townsend's big-eared bat (*Corynorhinus townsendii*).

The BSA is too low in elevation and does not provide suitable foraging habitat for desert bighorn sheep (*Ovis canadensis nelsoni*). There are no steep, rugged mountainous terrain within the BSA that would provide climbing habitat for the desert bighorn sheep to avoid predators. Desert bighorn sheep are known to cross valley floors to neighboring mountainous regions but due to the urbanization and highly disturbed condition of the BSA it is unlikely for desert bighorn sheep to cross within the BSA.

No small mammal burrows, with appropriate configuration in size and shape, or diagnostic sign for Mohave ground squirrel (*Xerospermophilus mohavensis*) were observed within the BSA. According to CDFW, the closest known population is located approximately 8.2-miles southwest of the BSA (CDFW 2023b). This area surrounds the town of Ridgecrest and moves east on State Route (SR) 178 towards the area known as Pinnacles Entrance. Additionally, the closest core population of Mohave ground squirrel is the Coso Range-Olancha core population approximately 25.0-miles northwest of the BSA.

The desert kit fox (*Vulpes macrotis arsipus*) could be present as a transient forager within the BSA. There are no CNDDDB records of this species because CNDDDB does not record

sightings due to the species not being listed State or federally listed as endangered, threatened, or species of special concern. However, the species is protected as a fur-bearing mammal under Fish and Game Code § 4000.

The Project site lacks optimal suitable denning habitat for the species due to the past and current level of disturbance and the surrounding BSA has been similarly degraded. However, kit foxes, in general, are highly adaptable and can forage from the nearby residential houses. No desert kit fox or diagnostic sign of the species (e.g., tracks, dens, scat, prey remains) were observed during the field survey, and the lack of small mammal burrows observed indicates the site does not support an adequate prey base. Surrounding land use and habitat conditions make it unlikely that the desert kit fox would be present, other than as a transient forager.

4.3.3 - NESTING MIGRATORY BIRDS AND RAPTORS

There were no active nests observed within the BSA during the survey. The transmission and utility poles outside the BSA could support a variety of nesting bird species, including larger species such as raptors and common raven.

4.4 - Critical Habitat, Movement Corridors, and Linkages

4.4.1 - PRESENCE OF CRITICAL HABITAT

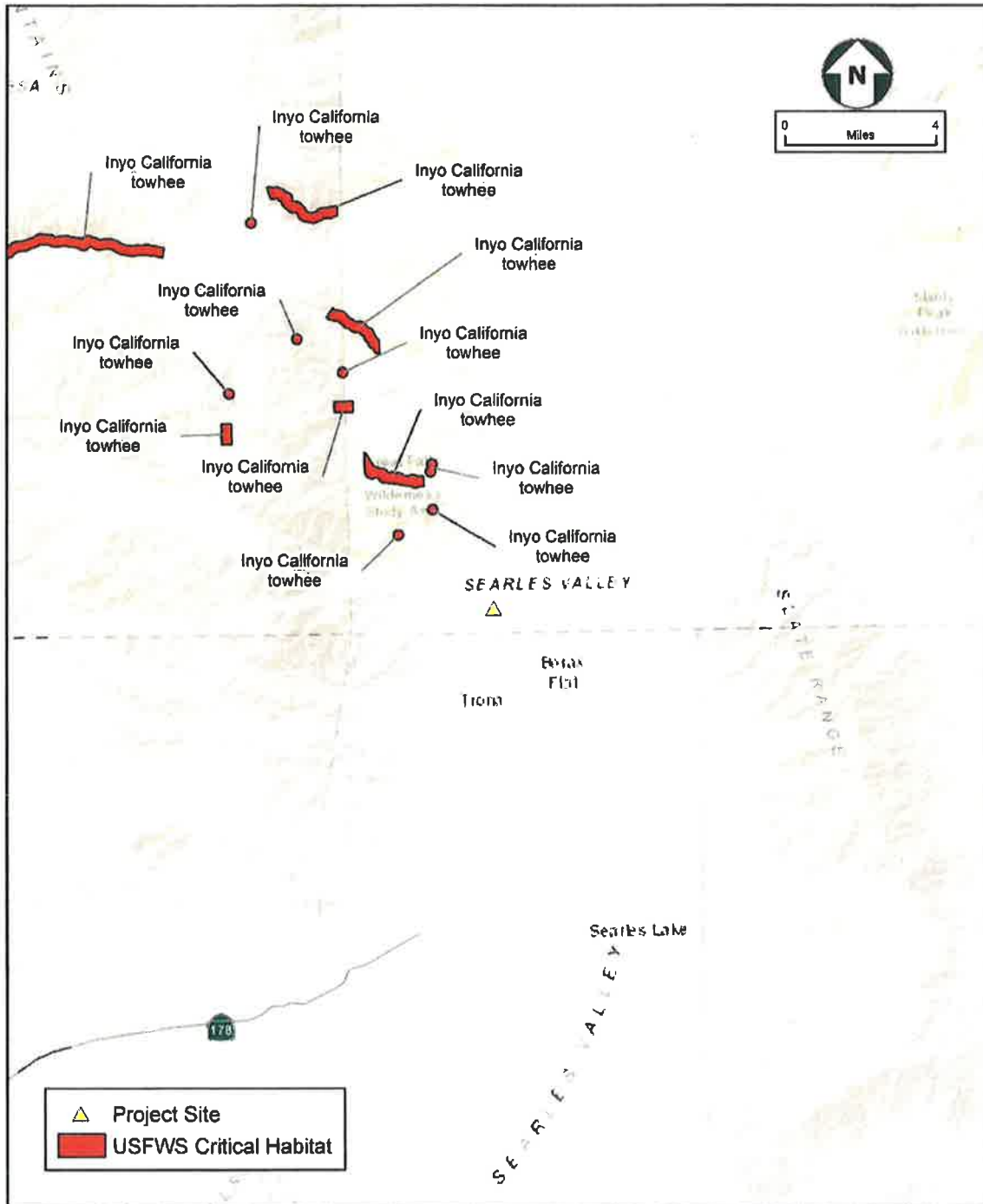
No designated critical habitat occurs within the BSA. The nearest USFWS designated critical habitat is for Inyo California towhee located approximately 3.1 miles northwest of the BSA (Figure 4-1).


4.4.2 - PRESENCE OF MOVEMENT CORRIDORS AND LINKAGES

There are no known wildlife movement corridors or habitat linkages that intersect the BSA. The Project is situated within a highly disturbed area that is predominately used for urban development and provides minimal linkage between suitable natural habitats for most wildlife species. Due to the highly disturbed condition of the Project, there is no substantial movement of wildlife onto or off of the BSA.

4.5 - Wetlands and Other Waters

The feature identified by the NHD that bisects the portion of the BSA, known as Trona 4, through in the middle of the northwest area that flows southeast towards Trona Wildrose Road was not observed during the survey. No stream indicators such as mud cracks, bed, or bank were identified. No hydrologic, topographic features or aquatic plant species were observed to indicate an intermittent riverine feature. The feature described in the NHD data does not currently exist on the Project site.



 **Figure 4-1**
Mapped Critical Habitat in the Project Vicinity
Trona 4 and 7 Solar Project,
Inyo County, California

SECTION 5 - POTENTIAL PROJECT IMPACTS

The purpose of this section is to present an evaluation of the potential for Project-related impacts to sensitive biological resources to occur resulting from Project construction activities. Although the potential for impacts of the Project is anticipated to be minor because the Project site is highly disturbed, there are some risks of Project impacts. These are discussed below.

5.1 - Potential Impacts to Sensitive Vegetation Communities

No sensitive vegetation communities occur within the BSA. The Project would not impact sensitive natural communities.

5.2 - Potential Impacts to Special-Status Plant Species

No special-status plant species occur within the BSA and there is no suitable habitat for any special-status plant species on or near the BSA. The Project would not impact any special-status plant species.

5.3 - Potential Impacts to Special-Status Wildlife Species

Two special-status wildlife species, desert kit fox, and nesting birds were determined to have potential to occur within the BSA as transients. Available habitat within the BSA fulfilling the foraging requirements of these species is limited to none. No potential desert kit fox dens were observed within the BSA and the potential for future habitation by foxes is limited due to the highly disturbed condition of the site. There was no diagnostic sign of nesting birds or raptors during the survey; however, existing transmission and utility poles are located outside the BSA, which would not be affected by the Project, could provide suitable stick nest building structures for nesting birds.

Any special-status species that use the Project as a movement corridor could be indirectly impacted by Project activities, though little wildlife was observed in or near BSA during the reconnaissance survey conducted for the Project.

5.4 - Potential Impacts to Nesting Birds and Raptors

No nests were observed within the BSA. There is potential for birds to forage and nest within the BSA in existing structures, and in tress and utility poles in the surrounding urban areas. If there are active nests present during Project activities, nests could be destroyed, and Project activities could interfere with normal breeding behaviors, which could discourage breeding or lead to nest abandonment or failure.

5.5 - Potential Impacts to Critical Habitat, Movement Corridors and Linkages

5.5.1 - POTENTIAL IMPACTS TO CRITICAL HABITAT

The Project would not impact any designated critical habitat.

5.5.2 - POTENTIAL IMPACTS TO MOVEMENT CORRIDORS AND LINKAGES

Project activities would not impact any movement corridors or habitat linkages.

5.6 - Potential Impacts to Wetlands and Waters

As noted previously, there is one record of a jurisdictional wetland feature within the BSA, as defined by the NWI (USFWS 2023c). However, this feature was not observed during the survey, and it is not currently present on the Project site. There were no other visible signs of waters or wetland features within the BSA, and there would be no impacts to wetland resources.

SECTION 6 - RECOMMENDATIONS

The Project is anticipated to have no impacts to sensitive natural communities, special-status plants, wetlands and water features, Critical Habitat, or migratory corridors. There is a low potential for Project activities to desert kit fox and nesting and foraging birds and raptors. To avoid or minimize impacts to these species and incidental impacts to other common, non-sensitive wildlife species, we recommend that the following measures be implemented as Best Management Practices (BMPs) during Project construction activities:

- A pre-activity survey of the Project and a 250-foot buffer for desert kit fox and nesting migratory birds and a 500-foot buffer for nesting raptors surrounding the Project footprint should be conducted. The survey should occur no less than 14 days prior to the start of construction activities and no more than 30 days prior to the start of construction activities. If construction is delayed beyond 30 days from the time of the survey, then another survey would need to be conducted. The survey should be conducted by a qualified biologist with adequate training and experience conducting surveys for special-status wildlife species.
- If dens or burrows that could support desert kit fox are discovered during the pre-activity survey, appropriate avoidance buffers, as outline in Table 6-1, should be established. No work should occur within these buffers unless a qualified biologist approves and monitors the activity.

**Table 6-1
Disturbance Buffers for Desert Kit Fox Dens**

Sensitive Resource	Buffer Zone from Disturbance (feet)
Potential desert kit fox den	50
Known desert kit fox den	100
Natal desert kit fox den	500

- A Worker Environmental Awareness Training Program should be prepared and presented to all workers that will be on-site during construction activities to minimize or eliminate impacts to sensitive biological resources.
- Project-related vehicles should observe a 20-mph speed limit in all Project areas, except on county roads and state and federal highways; this is particularly important at night when kit foxes, and other animals are most active. To the extent possible, nighttime construction should be minimized. Off-road traffic outside of designated project areas should be prohibited.
- To prevent inadvertent entrapment of kit foxes, and other wildlife species during work activities, the contractor should cover all excavated, steep-walled holes or trenches more than 2 feet deep at the close of each working day with plywood or similar materials or provide one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, the contractor should thoroughly inspect them for trapped wildlife.

- Kit foxes and other wildlife species are attracted to den-like structures such as pipes and may enter stored pipes, becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of 4 inches or greater that are stored at a construction site for one or more overnight periods should be thoroughly inspected for wildlife before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe should not be moved until the designated biologist has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity until the fox has escaped.
- All trash and food items that attract wildlife should be discarded into closed containers and properly disposed of at the end of each workday.
- To prevent harassment or mortality of listed species, no pets should be permitted on the Project site.

To protect nesting migratory birds and raptors, it is recommended that:

- If Project activities are scheduled during the breeding bird season, from February 1 through September 15, then a preconstruction survey for nesting birds should be conducted within the Project site and within a 500-foot radius surrounding the Project site for active nesting sites. Construction activities should not be conducted within 250 feet of an active bird nest and within 500 feet of an active raptor nest. These avoidance distances may be reduced if the qualified biologist determines that activities are not affecting the breeding success of the nesting birds.

SECTION 7 - SUMMARY AND CONCLUSIONS

Land within the Project site is highly disturbed and contains no habitat that would support special-status plant species or sensitive natural communities. There are no designated Critical Habitats, movement corridors, wetlands, or water features that would be impacted by the Project.

Based on the literature and database searches and results of the site survey, there is potential for special-status species to occur on the site: desert kit fox and nesting birds. Due to the disturbed nature of the Project, surrounded by residential development, a main roadway and urban uses, and the lack of a suitable prey base, impacts to the desert kit fox are not anticipated to occur. Desert kit foxes would likely be only transient visitors to the Project site. If nesting birds were to nest in the vicinity of the Project, impacts to the species could occur. Implementation of the recommended BMPs and avoidance measures outlined in Section 6 would minimize any Project impacts to these species.

This BRE has been performed in accordance with professionally accepted biological investigation practices conducted at this time and in this geographic area. The findings and opinions conveyed in this report are based on findings derived from specified historical and literary sources and a biological survey of the Project site and surrounding area. The biological investigation was limited by the scope of work performed. The biological survey was also limited by the environmental conditions present at the time of the survey. In addition, general biological (or protocol) surveys do not guarantee that the organisms are not present and would not be discovered in the future within the site. Mobile wildlife species could occupy the site on a transient basis or re-establish populations in the future. No other guarantees or warranties, expressed or implied, are provided.

SECTION 8 - REFERENCES

- California Department of Fish and Wildlife (CDFW). 2023a. California Natural Diversity Database (CNDDDB), Accessed via: <https://map.dfg.ca.gov/rarefind/view/RareFind.aspx>.
- California Department of Fish and Wildlife (CDFW). 2023b. Biogeographic Information and Observation System (BIOS). Accessed via: www.wildlife.ca.gov/data/BIOS.
- California Department of Fish and Wildlife (CDFW). 2023c. CDFW's Special Animals List
- California Native Plant Society (CNPS). 2023. Inventory of Rare and Endangered Plants. Accessed via: www.rareplants.cnps.org.
- Federal Emergency Management Agency (FEMA) 2023. On-line Map Service Center.
- Google LLC. 2023. Google Earth Pro.
- Mayer, K.E. and W.F. Laudenslayer, Jr. 1988. *A guide to wildlife habitats of California. State of California*. Resources Agency, Department of Fish and Game. Sacramento, CA. 166 pp. Accessed via: <https://www.wildlife.ca.gov/Data/CWHR/Wildlife-Habitats>.
- Netronline. 2023. Historic Aerials Viewer. Accessed via: www.historicaerials.com/viewer.
- United States Department of Agriculture, Natural Resources Conservation Service (NRCS). 2023. Web Soil Survey. Accessed via: <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>
- United States Fish and Wildlife Service (USFWS). 2023a. Information for Planning and Consultation online project planning tool. Accessed via: <https://ecos.fws.gov/ipac/>.
- United States Fish and Wildlife Service (USFWS). 2023b. Critical Habitat Portal. Accessed via: <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>.
- United States Fish and Wildlife Service (USFWS). 2023c. National Wetlands Inventory Wetlands Mapper (NWI). U.S. Geological Survey.
- United States Geological Survey (USGS). 2023. National Hydrography Dataset (NHD). Accessed via: <https://www.usgs.gov/core-science-systems/ngp/national-hydrography>.
- Western Regional Climate Center (WRCC). 2023. Cooperative Climatological Data Summaries, NOAA Cooperative Station Trona, California (049035). Accessed via: <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca0439>.

APPENDIX A

SPECIAL-STATUS SPECIES DATABASE SEARCH RESULTS

TRONA 4 AND 7 SOLAR PROJECT



Selected Elements by Common Name
California Department of Fish and Wildlife
California Natural Diversity Database



Query Criteria: Quad IS (Homewood Canyon (3511784) OR Slate Range Crossing (3511783) OR Manly Fall (3511782) OR Trona East (3511773) OR Trona West (3511774) OR Copper Queen Canyon (3511772) OR Westend (3511764) OR Searles Lake (3511763) OR Layton Spring (3511762))



Selected Elements by Common Name
California Department of Fish and Wildlife
California Natural Diversity Database






Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Amargosa beardtongue <i>Pensilemon fruticiformis</i> var. <i>amargosae</i>	PDSCR1L2F2	None	None	G4T3	S2	1B.3
Booth's evening-primrose <i>Eremothera boothii</i> ssp. <i>boothii</i>	PDONA03052	None	None	G5T4	S3	2B.3
burrowing owl <i>Athene cunicularia</i>	ABNSB10010	None	None	G4	S3	SSC
Ciokey's cryptantha <i>Cryptantha ciokeyi</i>	PDBOR0A3M0	None	None	G3	S3	1B.2
Darwin Mesa milk-vetch <i>Astragalus atratus</i> var. <i>mensanus</i>	PDFAB0F0Z3	None	None	G4G5T2	S2	1B.1
desert bighorn sheep <i>Ovis canadensis nelsoni</i>	AMALE04013	None	None	G4T4	S3	FP
desert tortoise <i>Gopherus agassizii</i>	ARAAF01012	Threatened	Threatened	G3	S2S3	
Emory's crucifixion-thorn <i>Castela emoryi</i>	PD9IM03030	None	None	G3G4	S2S3	2B.2
Inyo California towhee <i>Melospiza crissalis eremophilus</i>	ABPBX74071	Threatened	Endangered	G4G5T2	S2	
Le Conte's thrasher <i>Toxostoma lecontei</i>	ABPBK06100	None	None	G4	S3	SSC
long-eared owl <i>Asio otus</i>	ABNSB13010	None	None	G5	S3?	SSC
Mohave ground squirrel <i>Xerospermophilus mohavensis</i>	AMAFB05150	None	Threatened	G3	S2	
Morrison bumble bee <i>Bombus morrisoni</i>	IHYM24460	None	None	G3	S1S2	
pallid bat <i>Antrozous pallidus</i>	AMACC10010	None	None	G4	S3	SSC
Panamint alligator lizard <i>Elgaria panamintina</i>	ARACB01050	None	None	G3	S3	SSC
prairie falcon <i>Falco mexicanus</i>	ABNKD06090	None	None	G5	S4	WL
Ripley's aliciella <i>Aliciella ripleyi</i>	PDPLM041E0	None	None	G3	S2	2B.3
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	AMACC08010	None	None	G4	S2	SSC
western mastiff bat <i>Eumops perotis californicus</i>	AMACD02011	None	None	G4G5T4	S3S4	SSC
western small-footed myotis <i>Myotis ciliolabrum</i>	AMACC01230	None	None	G5	S3	
western snowy plover <i>Charadrius nivosus nivosus</i>	ABNNB03031	Threatened	None	G3T3	S3	SSC

Record Count: 21

Search Results

12 matches found. Click on scientific name for details

Search Criteria: 9-Quad include [3511773:3511772:3511784:3511782:3511783:3511764:3511762:3511763:3511774]

▲ SCIENTIFIC NAME	COMMON NAME	FAMILY	LIFEFORM	BLOOMING PERIOD	FED LIST	STATE LIST	GLOBAL RANK	STATE RANK	CA RARE PLANT RANK	CA ENDEMIC	DATE ADDED	PHOTO
Alicella ripleyi	Ripley's alicella	Polemoniaceae	perennial herb	May-Jul	None	None	G3	S2	2B.3		1974-01-01	 © 2020 Joey Malone
Astragalus stratus var. mansanus	Darwin Mesa milk-vetch	Fabaceae	perennial herb	Apr-Jun	None	None	G4G5T2	S2	1B.1	Yes	1980-01-01	No Photo Available
Astragalus lentiginosus var. borregoensis	Borrego milk-vetch	Fabaceae	annual herb	Feb-May	None	None	G5T5?	S4	4.3		1974-01-01	No Photo Available
Castela emoryi	Emory's crucifixion-thorn	Simaroubaceae	perennial deciduous shrub	(Apr)Jun-Jul(Sep-Oct)	None	None	G3G4	S2S3	2B.2		1974-01-01	No Photo Available
Cordianthus eremicus ssp. eremicus	desert bird's-beak	Orobanchaceae	annual herb (hemiparasitic)	Jul-Oct	None	None	G3T3	S3	4.3	Yes	1980-01-01	No Photo Available
Cryptantha clokeyi	Clokey's cryptantha	Boraginaceae	annual herb	Apr	None	None	G3	S3	1B.2	Yes	1994-01-01	No Photo Available
Diplocuc ruficula	Death Valley monkeyflower	Phrymaceae	perennial herb	Feb-Jun	None	None	G4	S4	4.3	Yes	1974-01-01	 © 2016 James Morefield
Eremothera boothii ssp. boothii	Booth's evening-primrose	Onagraceae	annual herb	Apr-Sep	None	None	G5T4	S3	2B.3		1980-01-01	No Photo Available
Lycium torreyi	Torrey's box-thorn	Solanaceae	perennial shrub	(Jan-Feb)Mar-Jun(Sep-Nov)	None	None	G4G5	S3	4.2		2015-05-05	No Photo Available
Penstemon nuttiformis var. amargosae	Amargosa beardtongue	Plantaginaceae	perennial herb	Apr-Jun	None	None	G4T3	S2	1B.3		1980-01-01	 Steve Matson 2017

<i>Plagiobryoides</i>	wine-colored	Bryaceae	moss	None	None	G3G4	S3S4	4.2	2014-06-10	No Photo Available
<i>Wissleria</i>	tufa moss									
<i>Yucca brevifolia</i>				CC	GNR	SNR	CBR		2011-12-13	No Photo Available

Showing 1 to 12 of 12 entries

Suggested Citation:

California Native Plant Society, Rare Plant Program. 2023. Rare Plant Inventory (online edition, v9.5). Website <https://www.rareplants.cnps.org> [accessed 6 May 2023].



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
Phone: (760) 431-9440 Fax: (760) 431-5901

In Reply Refer To:
Project Code: 2023-0079069
Project Name: Trona

May 08, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A biological assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a biological assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a biological assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found at the Fish and Wildlife Service's Endangered Species Consultation website at:

<https://www.fws.gov/endangered/what-we-do/faq.html>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/eO-13186.php>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

05/08/2023

3

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

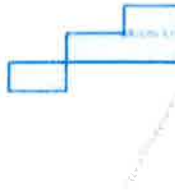
This species list is provided by:

Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
(760) 431-9440

PROJECT SUMMARY

Project Code: 2023-0079069
Project Name: Trona
Project Type: New Constr - Above Ground
Project Description: Trona Project
Project Location:

The approximate location of the project can be viewed in Google Maps: [https://
www.google.com/maps/@35.80623905,-117.350854358784,14z](https://www.google.com/maps/@35.80623905,-117.350854358784,14z)



Counties: Inyo County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. **NOAA Fisheries**, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
California Condor <i>Gymnogyps californianus</i> Population: U.S.A. only, except where listed as an experimental population There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8193	Endangered
Inyo California Towhee <i>Pipilo crissalis eremophilus</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3912	Threatened

REPTILES

NAME	STATUS
Desert Tortoise <i>Gopherus agassizii</i> Population: Wherever found, except AZ south and east of Colorado R., and Mexico There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4481	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: QK, Inc.
Name: Karissa Denney
Address: 5080 California Avenue
Address Line 2: Suite 220
City: Bakersfield
State: CA
Zip: 93309
Email: karissa.denney@qkinc.com
Phone: 6616162600

APPENDIX B
REPRESENTATIVE PHOTOGRAPHS OF THE
TRONA 4 AND 7 SOLAR PROJECT



Photograph 1: Northeast corner of the Project site, facing south.
GPS Coordinates: 35.807173, -117.348633.
Photograph taken by Eric Madueno on May 8, 2023.



Photograph 2: Northwest corner of the Project site, facing east.
GPS Coordinates: 35.806347, -117.350748.
Photograph taken by Eric Madueno on May 8, 2023.



Photograph 3: Center of the Project site, facing south.
GPS Coordinates: 35.805690, -117.351008.
Photograph taken by Eric Madueno on May 8, 2023.



Photograph 4: Southeast corner of the Project site, facing west.
GPS Coordinates: 35.805503, -117.348542.
Photograph taken by Eric Madueno on May 8, 2023.



Photograph 5: Southwest corner of the Project site, facing east.
GPS Coordinates: 35.805426, -117.353007.
Photograph taken by Eric Madueno on May 8, 2023.



Photograph 6: Southwest portion of the Project site, facing north.
GPS Coordinates: 35.804793, -117.354196.
Photograph taken by Eric Madueno on May 8, 2023.



Photograph 7: Northern portion of the Project site, facing north.
GPS Coordinates: 35.807118, -117.349915.
Photograph taken by Eric Madueno on May 8, 2023.

APPENDIX C

PLANT AND WILDLIFE SPECIES OBSERVED

TRONA 4 AND 7 SOLAR PROJECT

Table C - 1
Plant and Wildlife Species Observed within the BSA

Scientific Name	Common Name	Status
Plants		
<i>Ambrosia salsola</i>	cheesebush	None
<i>Chaenactis</i> sp.	pincushion	None
<i>Chylismia claviformis</i>	brown eyes	None
<i>Cryptantha</i> sp.	cryptantha	None
<i>Descurainia pinnata</i>	western tansymustard	None
<i>Grayia spinosa</i>	spiny hopsage	None
<i>Larrea tridentata</i>	creosote	None
<i>Lepidium flavum</i>	yellow pepper grass	None
<i>Loeseliastrum matthewsii</i>	desert calico	None
<i>Malacothrix glabrata</i>	desert dandelion	None
<i>Salsola</i> sp.	Russian thistle	None
<i>Suaeda nigra</i>	bush seepweed	None