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RB INYOKERN DATA CENTER

Application for Small Power Plant Exemption (SPPE)

Inyokern, Kern County, California

Docket Number – 26-SPPE-01

Appendix D Supplement — Section D.1 Revision 2

**Focused Survey for Agassiz's Desert Tortoise,
Habitat Assessments for Western Burrowing Owl, Mohave Ground Squirrel, and
General Biological Resource Assessment for the
Proposed RB Inyokern Data Center Project in the
Community of Inyokern, Kern County, California**

U.S. Geological Survey 7.5' Inyokern quadrangle, Township 26 South, Range 39 East, a
portion of Section 29, Mount Diablo Base and Meridian (MDB&M)

Job#: 26-061

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I hereby certify that the statements furnished herein, including attached exhibits, present the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. Field work conducted for this assessment was performed by me or under my direct supervision. I certify that I have not signed a nondisclosure or consultant confidentiality agreement with the project applicant or applicant's representative and that I have no financial interest in the project.



Circle Mountain Biological Consultants, Inc.
Author and Field Investigator: Edward L. LaRue, Jr.

September 2026

Figure 1. RB Inyokern Data Center: Vicinity Map

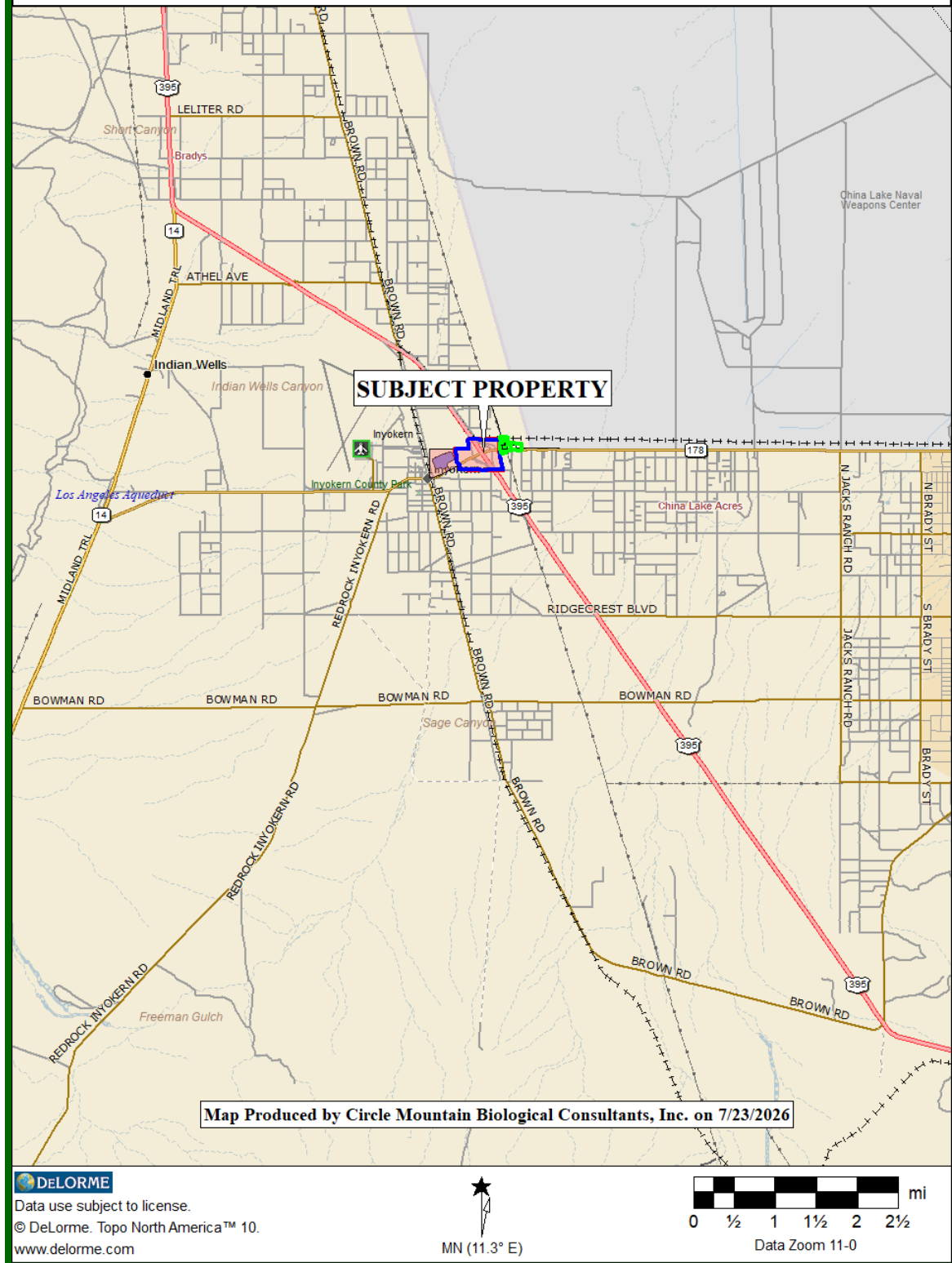


Figure 2a. RB Inyokern Data Center: Site Map with Existing and Proposed Facilities

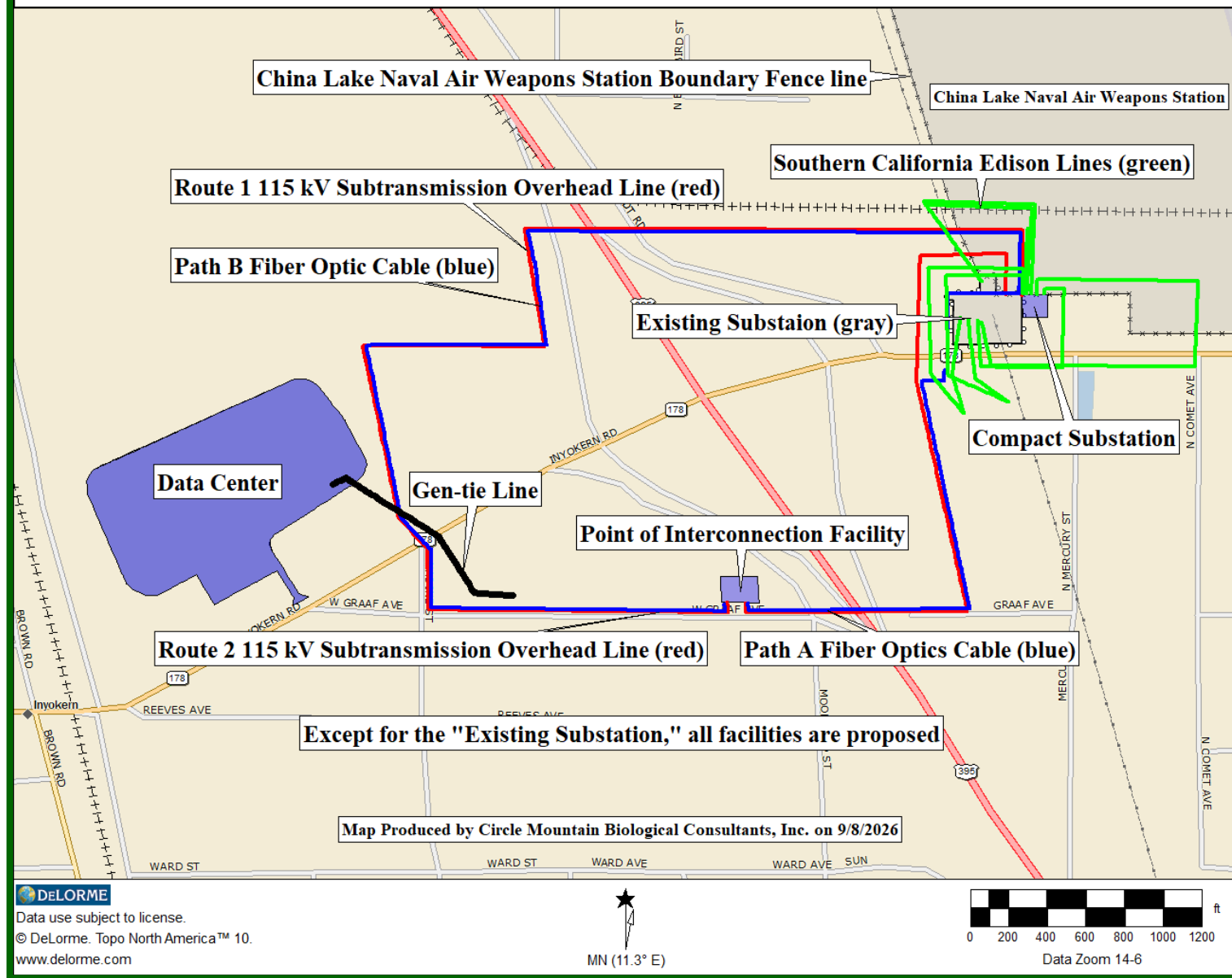


Figure 2b. RB Inyokern Data Center: Site Map with Private Land Survey Transect Locations

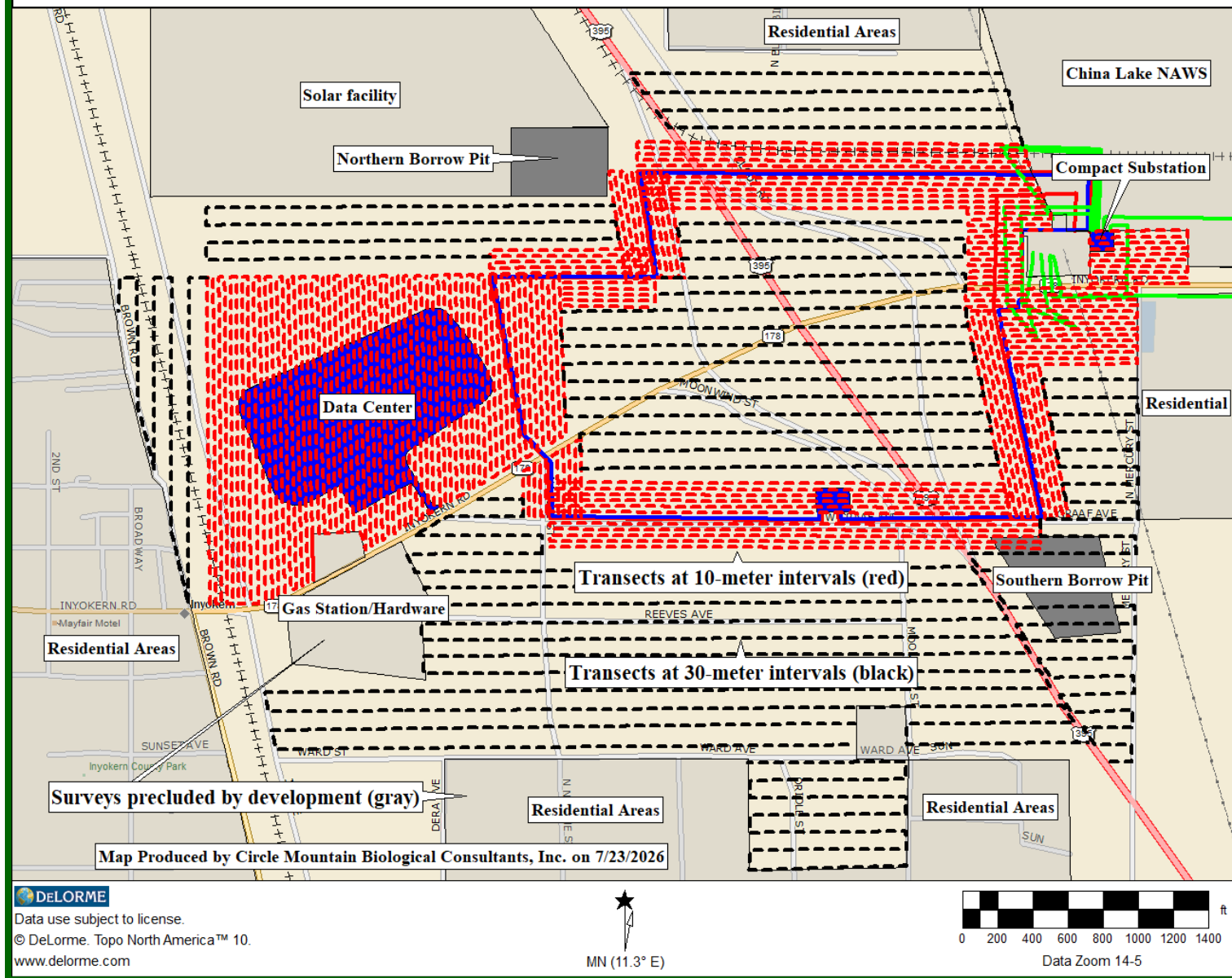


Figure 2c. Locations of 10-meter and 30-meter transects on China Lake on 9/3/2026

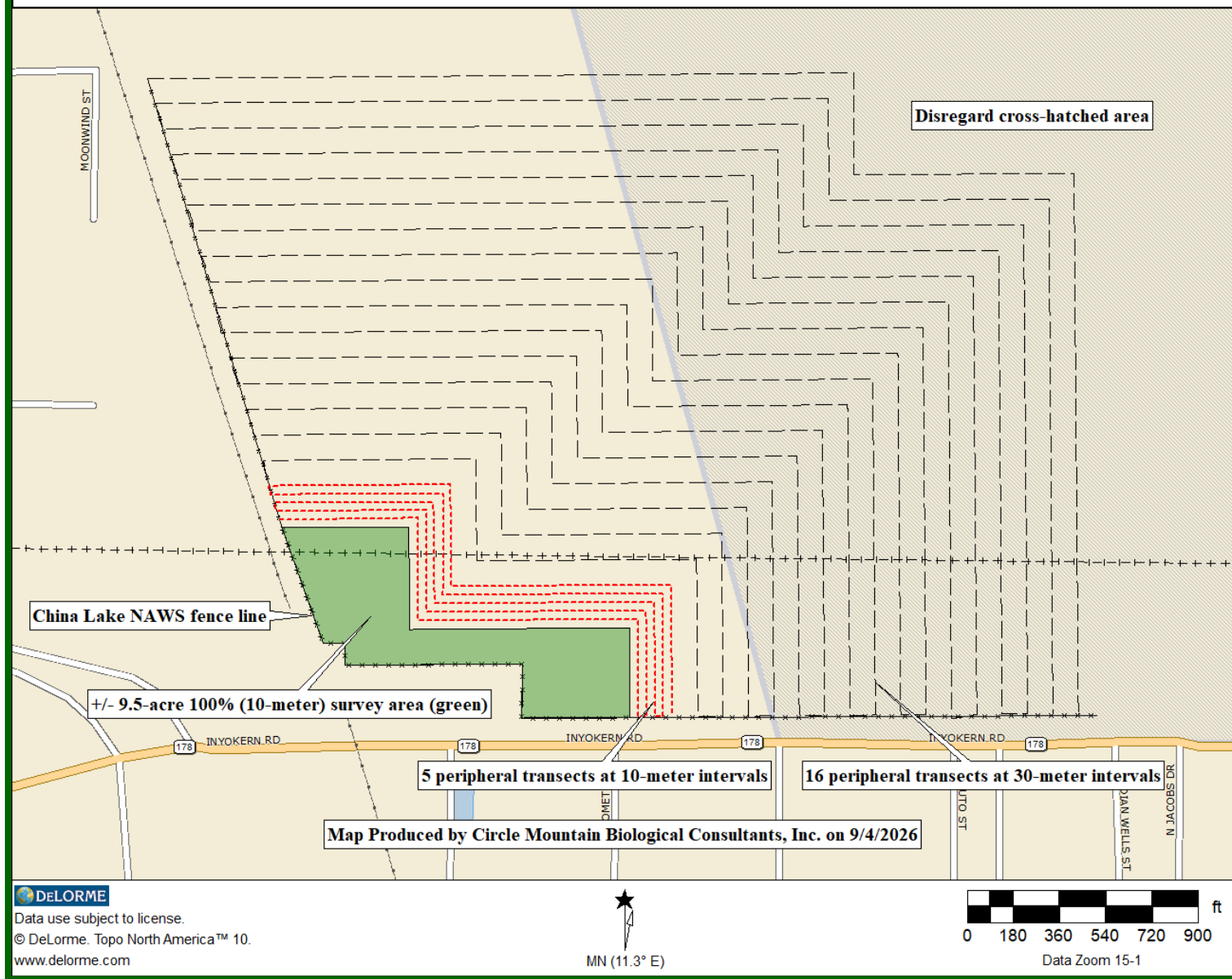


Figure 3a. Regional Tortoise Survey Results between 1991 and 2026

Legend:

- Tortoise sign found onsite
- Tortoise sign found along pipeline
- Only a tortoise carcass found onsite
- No tortoise sign onsite
- No tortoise sign along pipeline
- Only a tortoise carcass found along pipeline

Map Labels:

- CMBC 2009
- CMBC 2015 & 2022
- CMBC 2020
- SUBJECT PROPERTY
- CMBC 2016a
- CMBC 2024
- TMC 1991a
- TMC 1991b
- CMBC 2011
- CMBC 2016a
- CMBC 1997
- CMBC 2006
- CMBC 2006
- CMBC 2016b
- CMBC 2026
- CMBC 1997

Map Produced by Circle Mountain Biological Consultants, Inc. on 7/23/2026

Scale: 0 1/4 1/2 3/4 1 1 1/4 1 1/2 mi

Data Zoom 11-7

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MN (11.3° E)

Figure 3b. Burrowing Owl Resource Locations on Private Lands During 2026 Surveys

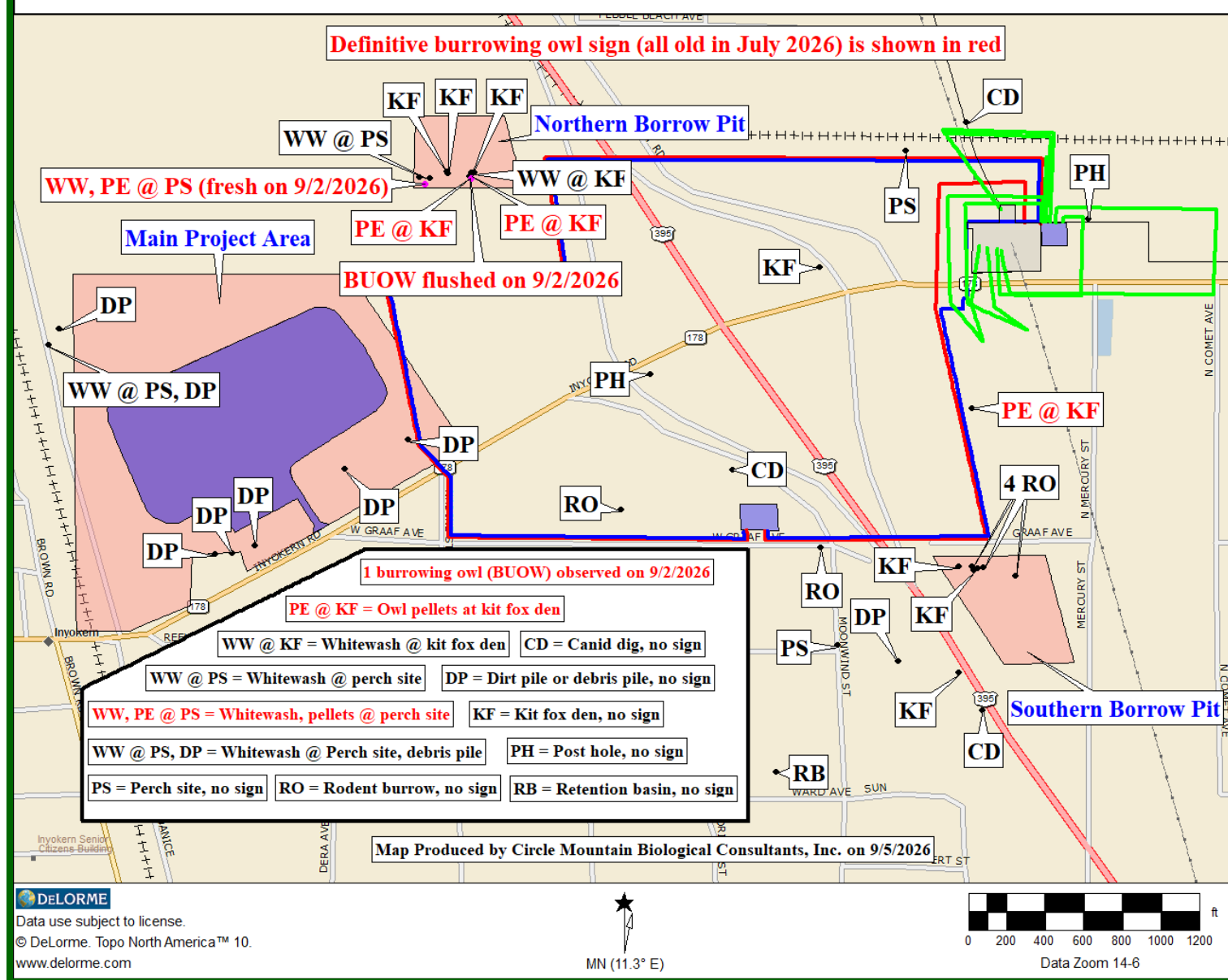


Figure 3c. Protected Plant Species Locations on Private Lands During July 2026 Surveys

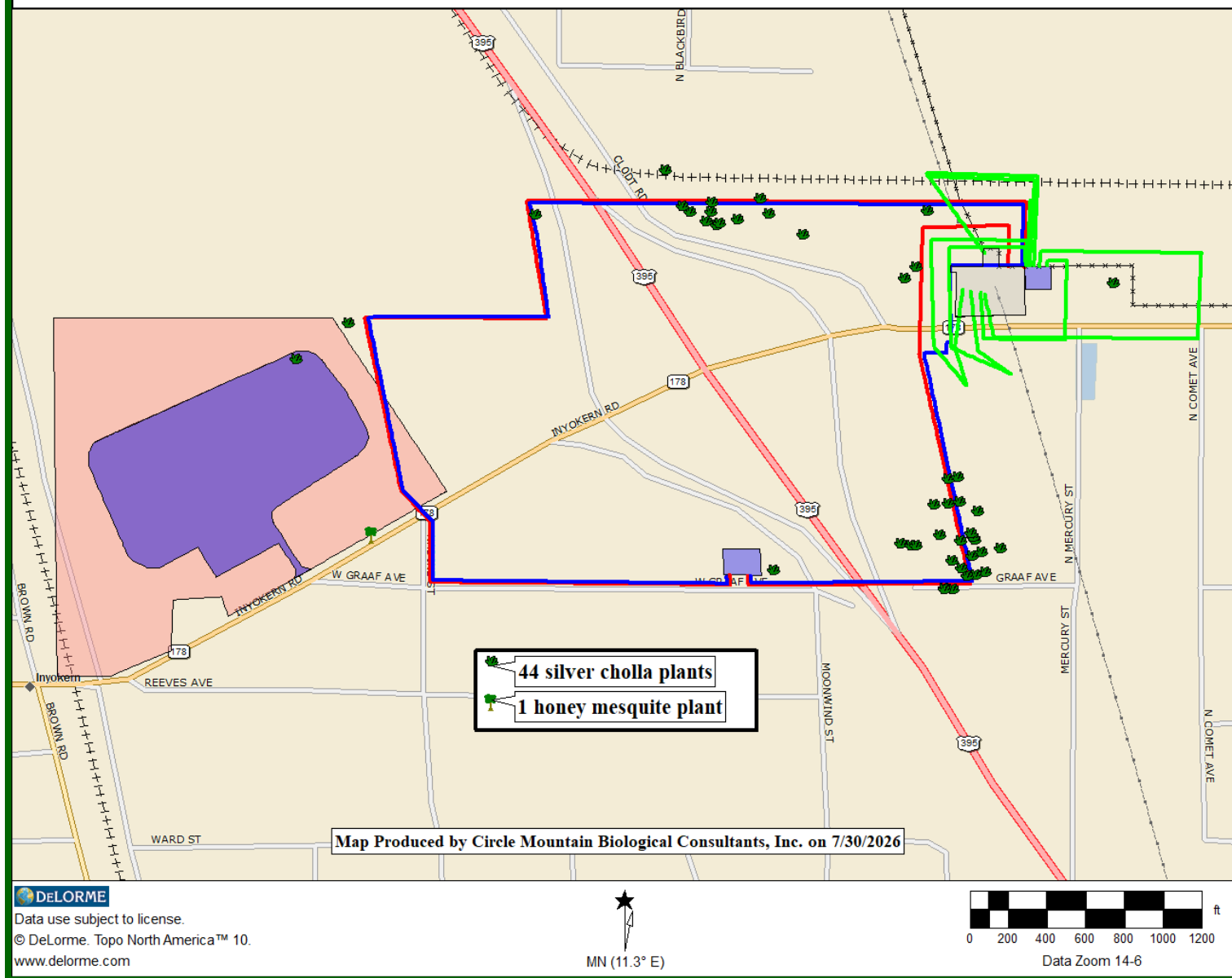
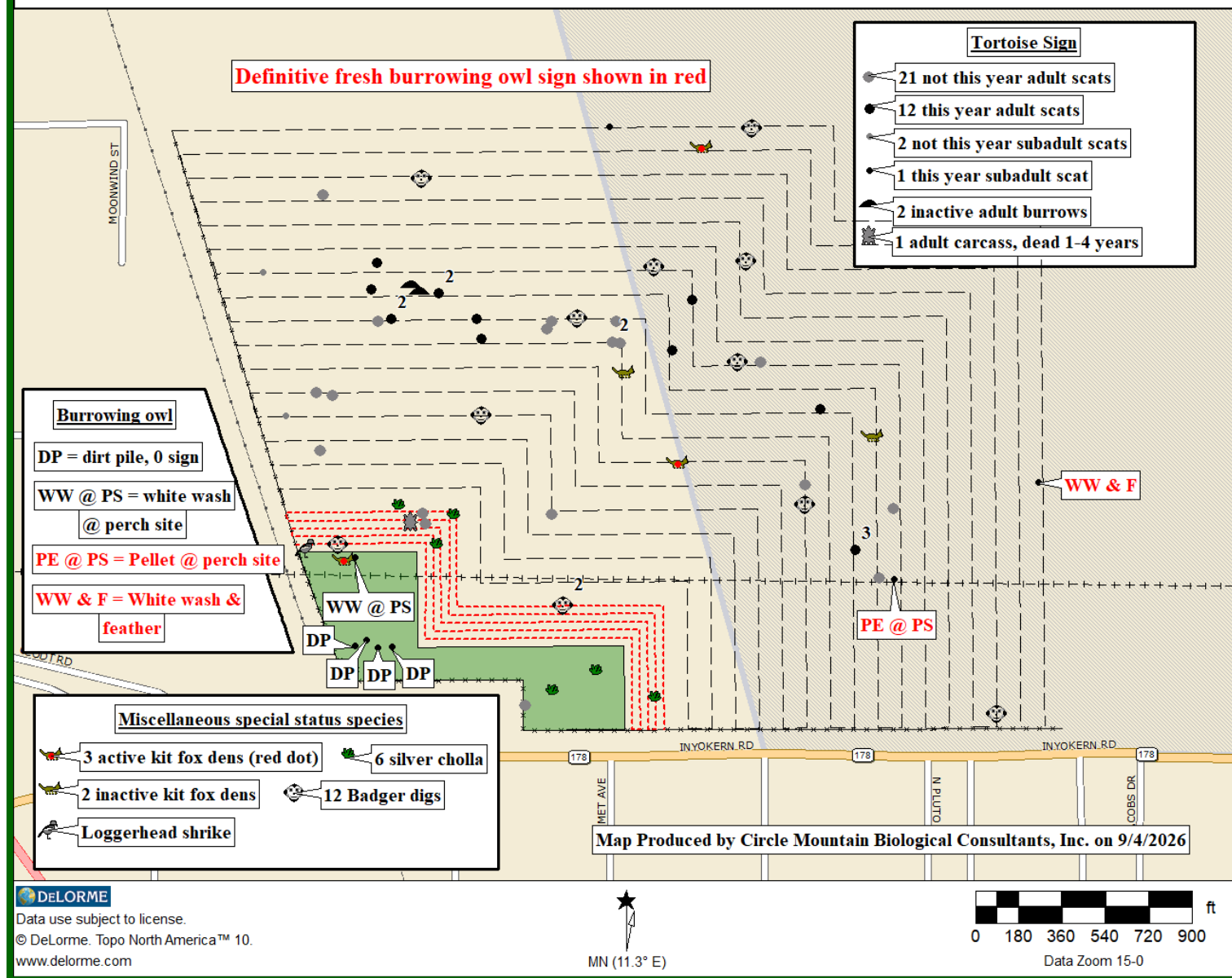
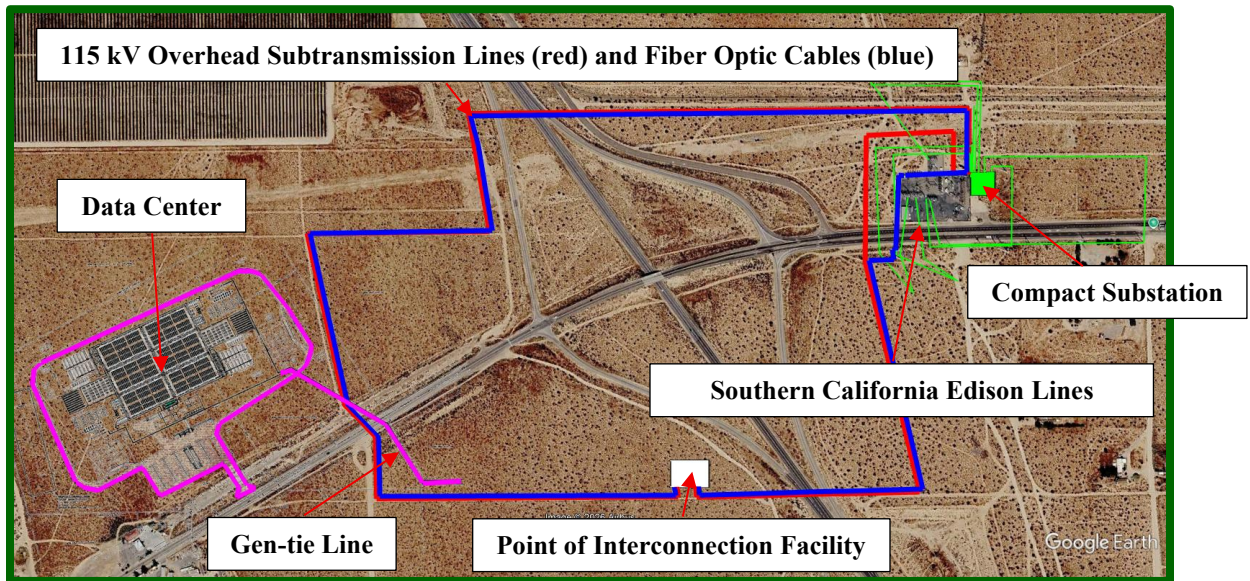


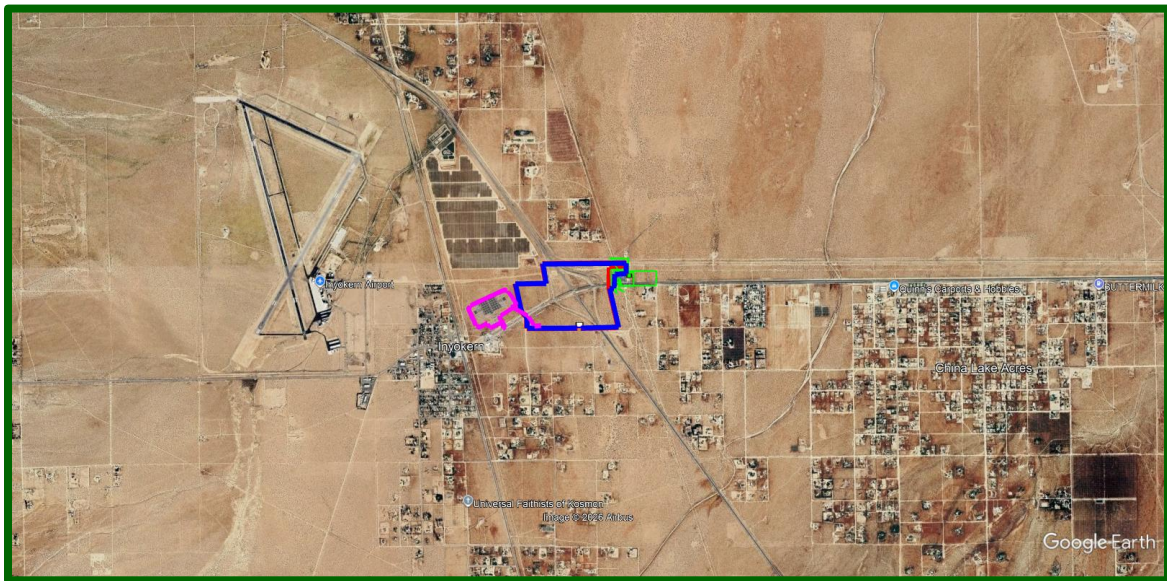
Figure 3d. Locations of special status species observed on China Lake 9/3/2026



**Figure 4a. RB Inyokern Data Center:
Aerial Photograph (©2026 Google Earth)**



Enlarged aerial view from approximately 7,500 feet altitude (Image date: 3/21/2026)



Regional aerial view from approximately 33,000 feet altitude.

Figure 4b. RB Inyokern Data Center: Direct Impact Areas and 100% Survey of Action Area

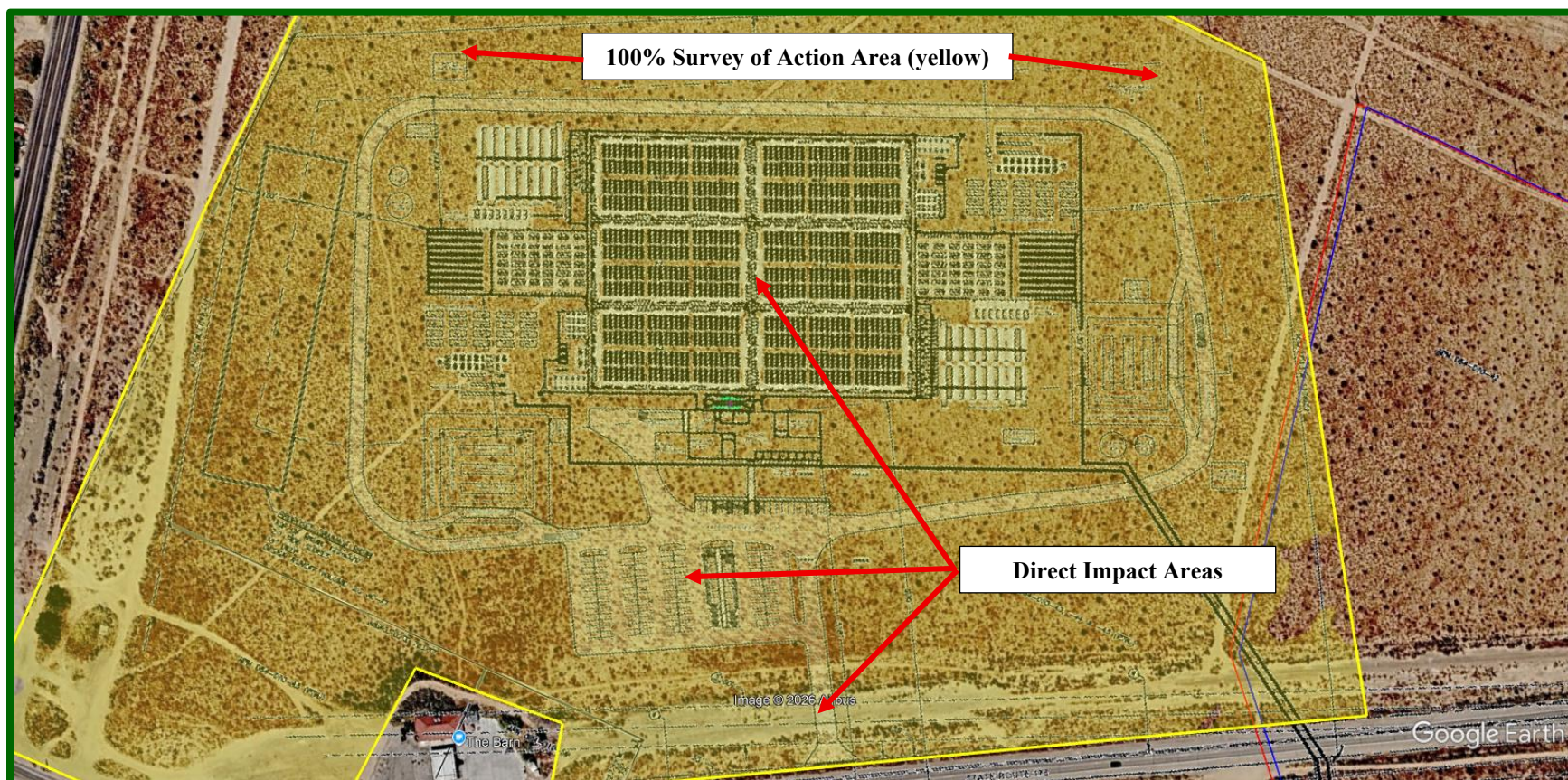


Figure 5a. Special Status Species Locations Reported to the CNDDDB

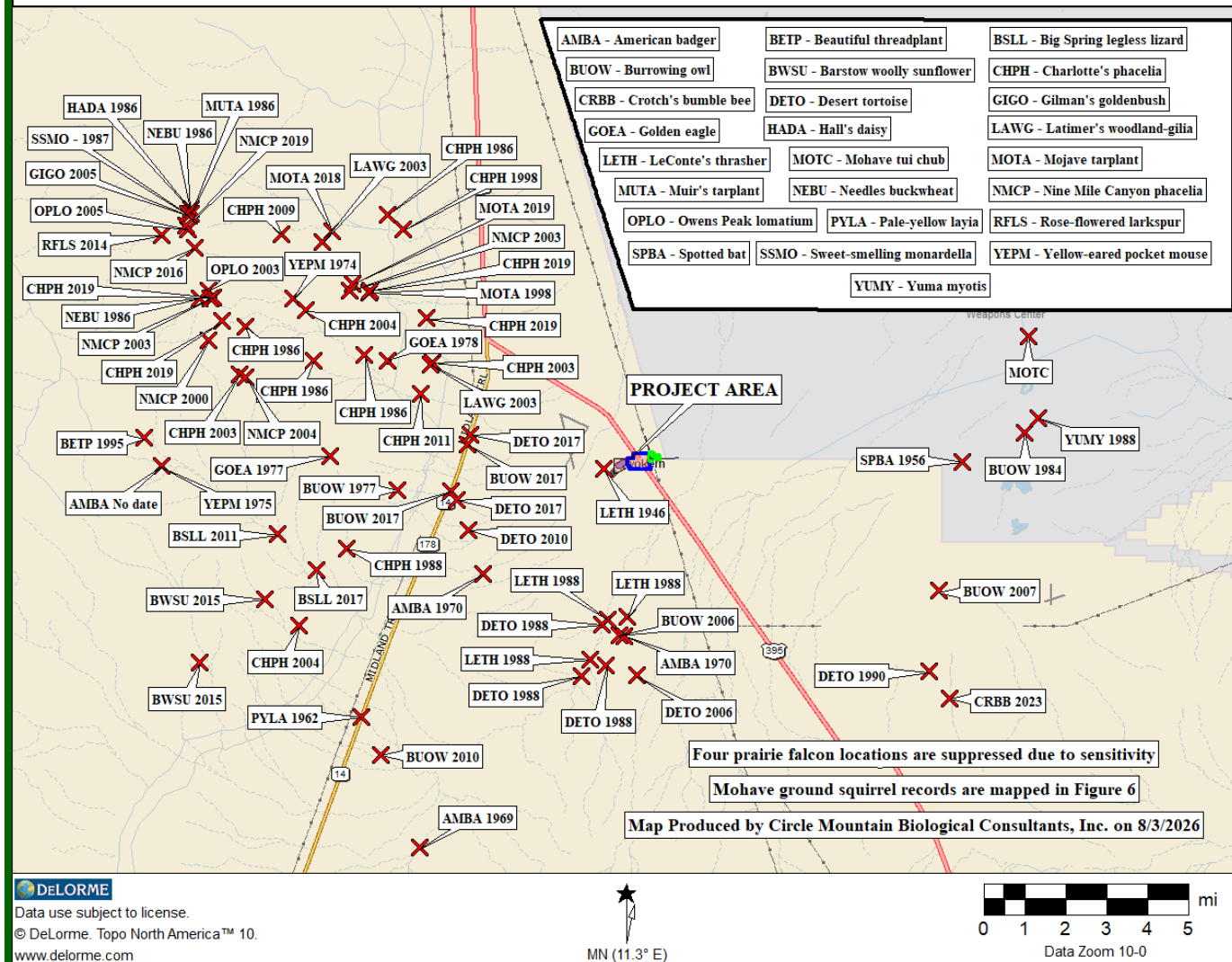


Figure 5b. Special Status Species Locations Reported by CMBC

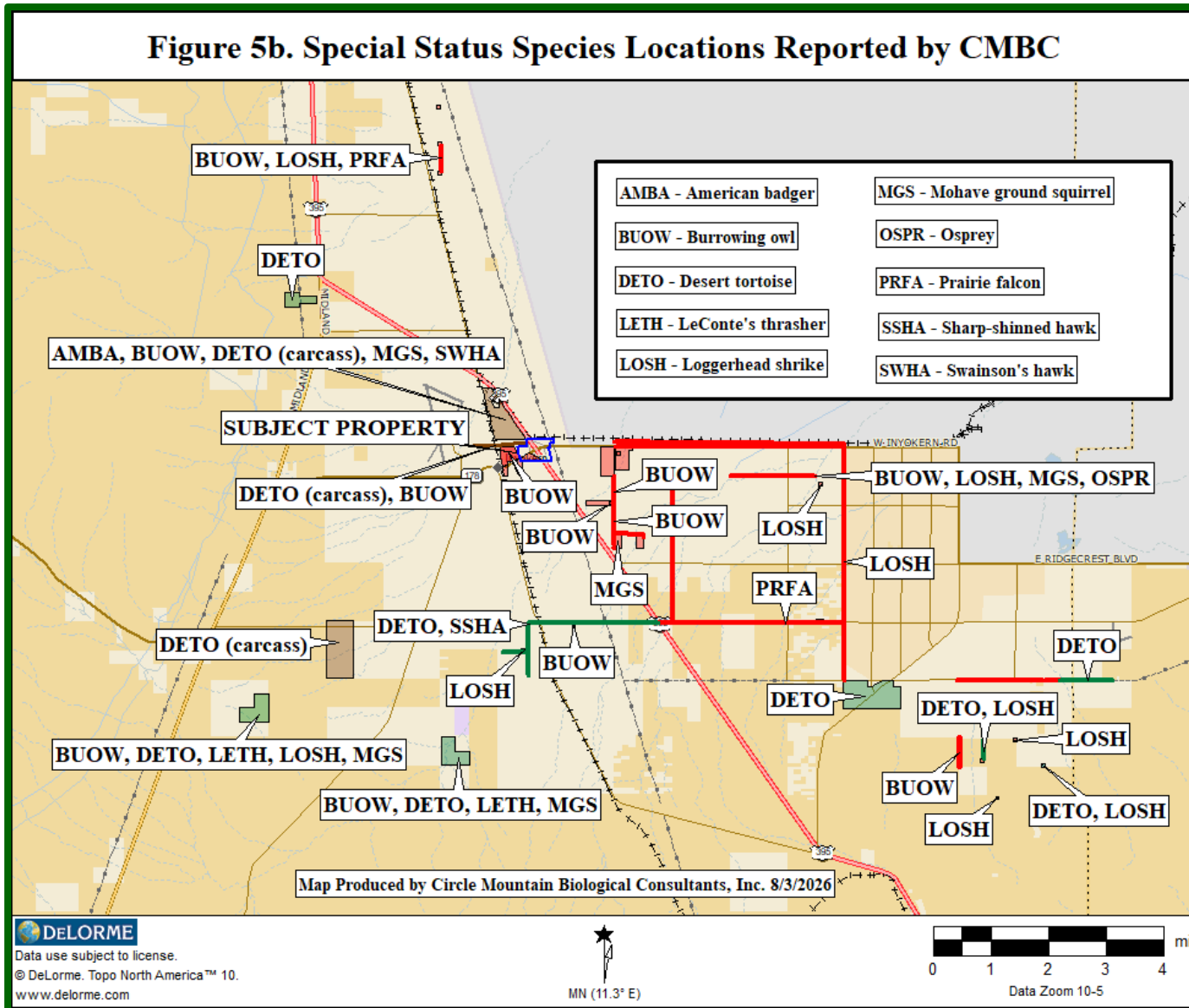
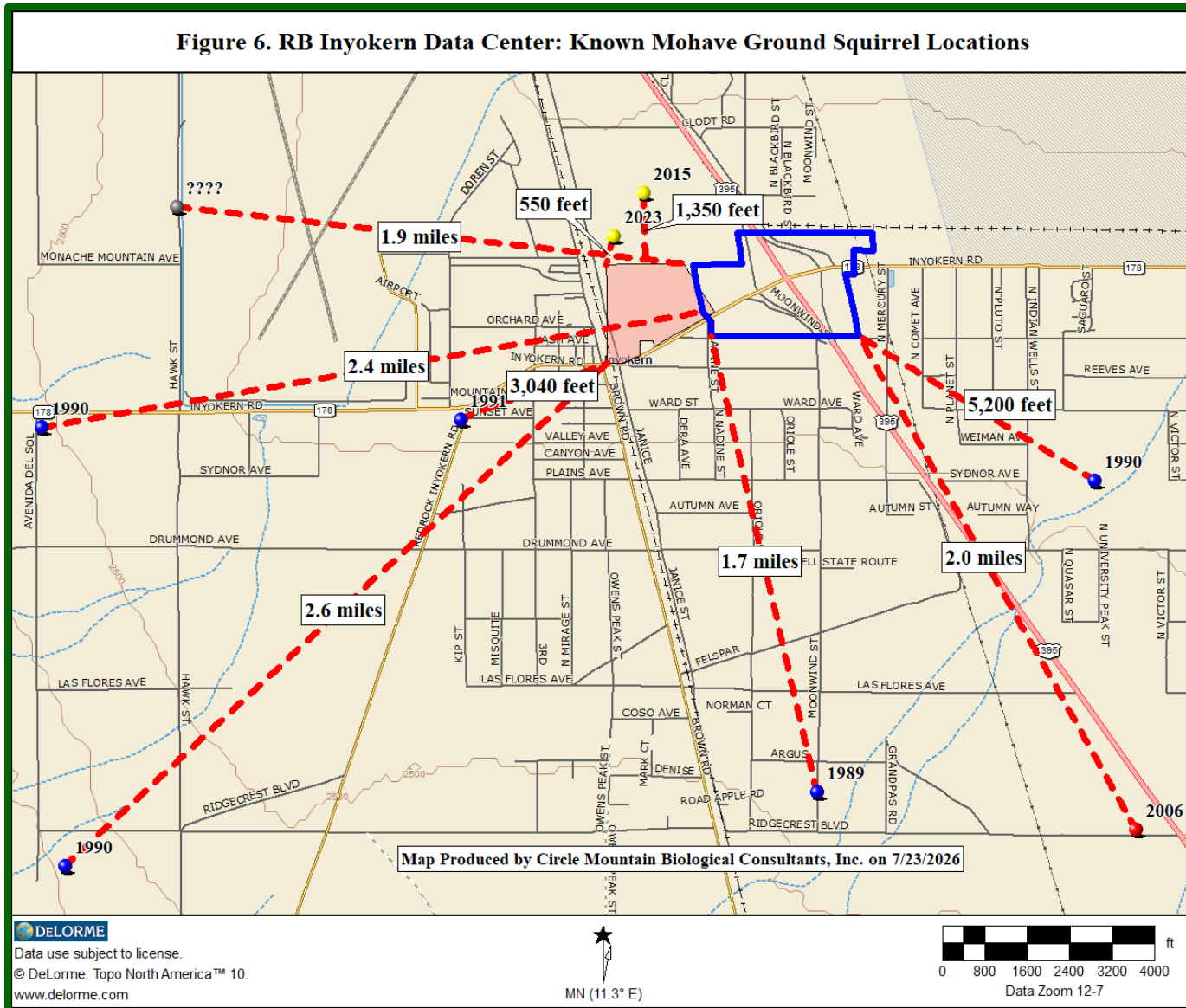


Figure 6. RB Inyokern Data Center: Known Mohave Ground Squirrel Locations



Executive Summary

Circle Mountain Biological Consultants, Inc. (CMBC) was contracted by R&L Capital, Inc. (herein “Proponent” or “RLC”) to perform focused surveys for Agassiz’s desert tortoise (*Gopherus agassizii*), habitat assessments for western burrowing owl (*Athene cunicularia*) and Mohave ground squirrel (*Xerospermophilus mohavensis*), and a general biological resource assessment on a 50-acre± site plus transmission lines and fiber optic cables, referred to as the proposed RB Inyokern Data Center Project.

The legal description for the Project area is Township 26 South, Range 39 East, a portion of Section 29, Mount Diablo Base and Meridian. The Data Center would be a 99 MW, approximately 238,000-square-foot single-story hyperscale facility located in Inyokern, eastern Kern County, California, on 50 acres±. The broader Project includes a hyperscale data center campus, a customer-owned electrical substation and Point of Interconnection, the existing Inyokern 115 kV Substation, two Southern California Edison (SCE)-constructed 115 kV overhead subtransmission lines and associated SCE electrical infrastructure, cooling and water systems, a wastewater and stormwater retention basin, an on-site groundwater well for emergency water supply, and a 1 MW rooftop/parking-canopy photovoltaic (PV) solar system supplying ancillary daytime power.

For a total of approximately 66 survey hours, on July 8, 9, and 10, 2026, Ed LaRue and Susan Seville of CMBC and subcontractor Tracy Bailey surveyed private lands outside China Lake NAWS including proposed sites and adjacent areas as described herein (see Figure 2b). Within the 60-acre± Main Project Area that includes the proposed Data Center, the three biologists surveyed 54 transects, spaced at 10-meter (30-foot) intervals and oriented along a north-south axis, inclusive of the 50-acre± Project area. Where not precluded by existing development, peripheral transects were surveyed for detection of burrowing owls at 30-meter (100-foot) intervals out to 500 meters.

Then on September 2, 2026, for approximately 18 hours, LaRue and Bailey surveyed 33 transects on an 18-acre± site on Navy lands, including five peripheral transects at 10-meter intervals around the 9.5-acre± parcel that encompasses SCE facility alignments, and 16 additional peripheral transects at 30-meter intervals out to 500 meters for detection of burrowing owl and other resources (see Figure 2c).

Based on DeLorme Topo USA® 10.0 software, elevations within the Project area range from approximately 737 meters (2,418 feet) at the northwest corner of the Data Center survey area up to 743 meters (2,440 feet) at the southeast corner of the transmission line/fiber optic cable. On Navy lands, elevations range from 739 meters (2,425 feet) along the southern boundary of the survey area down to 738 meters (2,421 feet) along the northern boundary. Terrain throughout is desert plain and soils are sandy loam. No blueline streams designated by the U.S. Geological Survey occur onsite. The 74 plant species identified during the surveys by CMBC and 71 species identified by EREMICO (2026) are listed in Appendix A. The 7 reptile, 18 bird, and 10 mammal species identified during the survey are listed in Appendix B.

Based on the absence of tortoise sign onsite and in adjacent areas, and available information reviewed for this habitat assessment, CMBC concludes that tortoises are absent from the private property portions of the Project area. Tortoise sign found on Navy lands within 500 meters of proposed impact areas included 36 fresh and older tortoise scats, including 33 deposited by adults and 3 deposited by subadults; 2 inactive burrows of adult tortoise(s); and 1 carcass of an adult male tortoise that died between one and four years ago. One of the older scats was found within the project impact area and two others were within 50 meters. So, tortoises may occur anywhere within the fenced Navy lands.

Based on the field survey and habitat assessment, CMBC concludes that none of 35 special status species (listed in alphabetical order) reported from the region will likely be adversely affected by site development: Barstow woolly sunflower, beautiful threadplant, Big Springs legless lizard, Charlotte's phacelia, Death Valley sandmat, desert bird's-beak, Gilman's goldenbush, golden eagle, Hall's daisy, inland gilia, Inyo onion, Latimer's woodland gilia, LeConte's thrasher, limestone dudleya, Mohave tui chub, Mojave fish-hook cactus, Mojave tarplant, monarch butterfly, Muir's tarplant, Needles buckwheat, Nine Mile Canyon phacelia, osprey, Owen's Peak lomatium, pale-yellow layia, pine fritillary, rose-flowered larkspur, short-bracted bird's-beak, Spanish needle onion, spotted bat, Swainson's hawk, sweet-smelling monardella, Townsend's big-eared bat, western Joshua tree, yellow-eared pocket mouse, and Yuma myotis. As such, no mitigation measures are recommended.

Those species either identified during the current survey, for which suitable habitats may be present, and/or CMBC and EREMICO cannot conclude are absent include crowned muilla, Kern County evening-primrose, white pygmy poppy, Mohave ground squirrel, Crotch's bumble bee, western burrowing owl, loggerhead shrike, prairie falcon, sharp-shinned hawk, American badger, and kit fox.

Focused surveys are recommended for three rare plant species (crowned muilla, Kern County evening-primrose, and white pygmy poppy) and Crotch's bumble bee in the spring of 2027. Additional surveys are recommended for western burrowing owl and kit fox to continue to monitor the status of these two species in the interim as incidental take permit applications are being finalized and before ground disturbance.

RLC intends to apply for a Section 2081 incidental take permit from the California Department of Fish and Wildlife and a Section 10(a)(1)(B) incidental take permit from the U.S. Fish and Wildlife Service for potential impacts to desert tortoise, Mohave ground squirrel, western burrowing owl, LeConte's thrasher, and Crotch's bumble bee.

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**Focused Survey for Agassiz's Desert Tortoise,
Habitat Assessments for Western Burrowing Owl and Mohave Ground Squirrel,
and General Biological Resource Assessment for the
Proposed RB Inyokern Data Center Project in the
Community of Inyokern, Kern County, California**

1.0. Introduction

1.1. Purpose and Need for Study. Circle Mountain Biological Consultants, Inc. (CMBC) was contacted by Robbie Barker on behalf of R&L Capital, Inc. (herein “Proponent” or “RLC”) to perform a focused survey for Agassiz’s desert tortoise (*Gopherus agassizii*), habitat assessments for western burrowing owl (*Athene cunicularia*) and Mohave ground squirrel (*Xerospermophilus mohavensis*), and a general biological resource assessment on a 50-acre± site plus transmission lines and fiber optic cables, referred to as the proposed RB Inyokern Data Center Project (“RBIDC” or the “Project”), located in Kern County, California (see Figures 1 and 2). Given the location of the site in an unincorporated portion of the county and because Kern County does not have specific guidelines for biological reports, this report has been prepared, in part, according to County of San Bernardino’s *Report Protocol for Biological Assessment Reports* (County of San Bernardino 2006).

As the California Environmental Quality Act (CEQA) Lead Agency, the California Energy Commission (CEC) is required to determine if site development will result in any adverse impacts to rare biological resources and if so, to judge the efficacy of recommended mitigation measures to offset those impacts. The information may also be useful to federal and State regulatory agencies, including U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW), respectively, if the Lead Agency asks them to assess impacts associated with proposed development. Results of CMBC’s focused tortoise survey, burrowing owl and Mohave ground squirrel habitat assessments, and general biological resource assessment are intended to provide sufficient baseline information to these agencies to determine if significant impacts will occur and to identify mitigation measures, if any, to offset those impacts.

QK (2025a) performed protocol plant surveys on three days in March, April, and May 2024. Reconnaissance surveys “were conducted [in August and November 2025] to document current site conditions, evaluate potential biological resources onsite, and determine the suitability of the habitat to support special-status plant and wildlife species that may occur on the Project Site,” the results of which are reported in a biological analysis report for the proposed Project, dated December 2025 (BAR). In addition to reporting CMBC’s own results, Section 4.2.3 of this biological technical report responds to CEC’s additional data requests on June 11, 2026, (herein, “CEC Memo”), relative to QK’s December 2025 BAR (CEC 2026)¹.

¹ <https://www.dropbox.com/scl/fi/4v29u19hiecr62wzy0o2/FINAL-RB-Inyokern-Data-Center-Data-Requests-Set-1.pdf?rlkey=iri2et5o1uucinaab38kztff64b&dl=0>

1.2. Project Description.

1.2.1. *Project Site.* The legal description for the subject property is Township 26 South, Range 39 East, a portion of Section 29, Mount Diablo Base and Meridian (MDB&M). The RBIDC would be a 99 MW, approximately 238,000-square-foot single-story hyperscale data center facility located in Inyokern, eastern Kern County, California, on 50 acres± comprising APNs 084-010-43, 084-010-44, 084-010-45, and 084-010-48.

The Path A overhead fiber optic cable (the blue line in Figure 2a) connects the Compact Substation with the Point of Interconnection Facility, running cross country south from the Compact Substation, turning west along Graff Avenue, and crossing Highway 395 to the west along Graff Road to connect with the Point of Interconnection Facility. The Path B overhead fiber optic cable travels north from the Compact Substation along a dirt road, turning west to run cross country and across Highway 395, running south along a dirt road, turning west to follow a dirt road, turning south cross country to cross Highway 178, where it then runs south along Nadine Street, and turns east along Graff Avenue to connect with the Point of Interconnection Facility.

The Route 1 115 kV overhead transmission line (red) and Route 2 115 kV overhead transmission line (blue) that run north and south of Highway 178, respectively, essentially follow the same centerlines for the fiber optic cables, plus or minus five meters. Unlike the buried portion of the fiber optic cable, which would result in continuous impacts along the right-of-way for 1,000 feet, the overhead transmission lines result in impacts at the points where 115 kV structures are inserted into the ground. Route 1 would be approximately 8,000 linear feet and include five tubular steel poles and thirty-four lightweight steel structures. Route 2 would be approximately 4,000 linear feet, including five tubular steel poles and fourteen lightweight steel structures. Note these are 115 kV subtransmission structures rather than distribution poles.

No temporary access roads, staging, or laydown areas are proposed outside the Project boundary. All such construction areas are assumed to occur within the Project boundary as shown on the site plan and analyzed in the application. Site access is provided via a primary entrance on SR-178, with an internal circulation road serving as the assumed construction travel path. The exceptions are the SCE facilities, for which final engineering is not yet complete; because those work areas are not yet defined, potential temporary access roads, staging, or laydown areas were surveyed on a contingency basis as described below.

1.2.2. *Small Power Plant Exemption (SPPE).* The SPPE component consists of diesel-fired emergency generator sets sized to serve the 99 MW facility, designed exclusively to serve on-site critical loads during utility outages and for limited commissioning, testing, and maintenance. The generator configuration reflects two generator yards of 20 units each providing N+1 redundancy per yard (N+2 campus-wide); the maximum operational load served under any scenario is 99 MW. The emergency generating facility would not export electricity to the grid.

1.2.3. *Project Scope.* The broader Project includes a hyperscale data center campus, a customer-owned electrical substation and Point of Interconnection, the existing Inyokern 115 kV Substation, two alternative linear development (Route 1 or 2) of Southern California Edison (SCE)-constructed 115 kV overhead subtransmission lines and associated SCE electrical infrastructure, two alternative linear development of SCE constructed overhead fiber optic cables (Path A or B), cooling and water systems, a wastewater and stormwater retention basin, an on-site groundwater well for emergency water supply, and a 1 MW rooftop/parking-canopy photovoltaic (PV) solar system supplying ancillary daytime power.

MOS174 governs the SCE facility parameters for the Project, which shows four risers per path against 3,200 and 8,250 linear feet of cable, so the fiber is carried overhead. The only underground fiber components are about 1,000 linear feet of conduit and three 4'x4'x6' manholes. Given 1,000 linear feet of buried cable and the assumption that installation is continuous, there will be some ground disturbance depending on the width of the right-of-way, as described below.

1.2.4. *Water Supply and Wastewater.* The Project will be served by the Inyokern Community Services District (CSD) for domestic water, wastewater, stormwater, and sanitary sewer service, consistent with the executed Will Serve Letter (April 2, 2026) referenced in the RLC's SPPE application (Section 1.4.5). The Project will be served by the Inyokern CSD for domestic water, wastewater, stormwater, and sanitary sewer service under the executed Will Serve Letter dated April 2, 2026. Connections to existing CSD infrastructure are anticipated within established easements in the vicinity of the Project Site, with final tie-in locations confirmed through final engineering. Biological and botanical surveys covered a 500-meter action area extending beyond the Project footprint.

2.0. Methods

2.1. Literature Review. CMBC consulted materials included in our library to determine the nearest tortoise locations and other special status plant and animal species that have been reported from the vicinity of the subject property. Between 1991 and 2026, CMBC has completed approximately 38 focused tortoise surveys in the Indian Wells Valley Area, including Inyokern to the west, Ridgecrest to the east, and Little Lake to the north. Of relevance given their proximity to the subject property are 13 focused tortoise surveys located within 100 feet north (CMBC 2020) and 4.0 miles northwest of the RBIDC (CMBC 2009), between 1991 (TMC 1991a, 1991b) and 2026 (CMBC 2026), which, along with the subject property, are mapped in Figure 3a.

A reconnaissance-level survey of the proposed Data Center portion of the site was surveyed in 2016 (CMBC 2016b), and zone of influence transects were surveyed on portions of the site in 2020 (CMBC 2020). Additional information is taken from QK's (2025a) BAR. These and other materials used in the completion of this report are listed in Section 5.0, below.

CMBC enlisted botanist, Denise LaBerteaux, of EREMICO Biological Services, LLC. (EREMICO), to determine the likelihood of occurrence for rare plants in the Project area. In accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018), EREMICO (2026) and CMBC consulted the latest version of the California Natural Diversity Data Base (CDFW 2026a; herein “CNDDDB”) for rare plant and animal records reported from the USGS 7.5’ Freeman Junction, Inyokern, Inyokern Southeast, Ninemile Canyon, Owens Peak, Pearsonville, Ridgecrest South, Spangler Hills, and White Hills quadrangles, which encompass and surround the site.

LaBerteaux visited nearby Short Canyon on July 6, 2026 where she located Mohave tarplant and Death Valley sandmat, confirming that they were detectable at the time of surveys on the RBIDC, which she performed on July 13-15 and September 3, 2026. Ed LaRue and LaBerteaux agreed that CMBC would report on the locations of silver chollas and any other plant species that are designated as protected native plant species by the 1998 Food and Agricultural Code, Division 23: California Desert Native Plants Act, Chapter 3: Regulated Native Plants, Section 80073. EREMICO’s (2026) likelihood of occurrence for rare plant species is reported herein in Section 3.2.2.

2.2. Field Surveys.

2.2.1. *Survey and Habitat Assessment Protocols.* A significant paper was published in June 2011 (Murphy et al. 2011) whereby the “desert tortoise” of the Mojave Desert was split into two species, including *Gopherus agassizii*, referred to as “Agassiz’s desert tortoise,” and a newly described species, *G. morafkai*, referred to as “Morafka’s desert tortoise,” which occurs in the Sonoran Desert. According to Murphy et al. (2011), “...this action reduces the distribution of *G. agassizii* to only 30% of its former range. This reduction has important implications for the conservation and protection of *G. agassizii*, which may deserve a higher level of protection.” Then in 2016 (Edwards et al. 2016), a third species of tortoise was described, referred to as the “Goode’s Thornscrub Tortoise” (*Gopherus evgoodei*), which further reduced the perceived range of Morafka’s desert tortoise. Agassiz’s desert tortoise is designated as a threatened species by the USFWS and an endangered species by the CDFW, and is the species occurring in the region surrounding the subject property.

For **Agassiz’s desert tortoise**, in various emails from Elizabeth Huber of the CEC and Chris Huntley of Aspen Environmental Groups, Inc. (AEG) on July 7 and 8, 2026, CMBC was asked to survey the proposed Data Center (Main Project Area), Point of Interconnection Facility, and the Compact Substation and areas out to 50-meters either side of centerlines of all linear facilities (e.g., transmission lines and fiber optic cables) along transects spaced at 10-meter intervals (shown as red dashed lines in Figure 2b and 2c), which follows the recommended desert tortoise presence-absence survey protocol (USFWS 2019).

The bright green lines shown around the existing substation and proposed Compact Substation in Figures 1, 2a, 2b, 2c, 3b, 3c, and 4a represent facilities proposed by SCE that would be associated with the Data Center and ancillary facilities. In an email on July 28, 2026, Jasmin Navar of SCE when asked about field surveys on China Lake NAWS, responded, “At this time, SCE has not developed final Project-specific facility designs, transmission line routing, construction methods, environmental assumptions, or other engineering details.” CMBC anticipated that the green lines were preliminary, so field crews surveyed all of these areas and adjacent areas out to 50 meters along transects spaced at 10-meter intervals, for a 100% presence-absence survey of all SCE facility potential impact areas.

CMBC followed the presence-absence survey protocol first developed by the USFWS in 1992 and revised in 2019. The USFWS (2019) protocol recommends surveying transects at 10-meter (30-foot) intervals throughout all portions of a given parcel. An *action area* is defined by regulation as all areas to be affected directly or indirectly by proposed development and not merely the immediate area involved in the action (50 CFR §402.02). For this site, the action area is comprised of all lands within 500 meters of the Data Center (Main Project Area), Point of Interconnection Facility, and the Compact Substation. Since the site is smaller than 500 acres, it may be surveyed year-round. There is no opportunity to estimate the density of tortoises on Navy lands where tortoise sign was found, as no live animals larger than 160 millimeters were observed (USFWS 2019).

For **western burrowing owl**, although the formal habitat assessment guidelines do not specify a given interval to survey a site (Appendix C in CDFG 2012), subsequent breeding and nonbreeding studies identify that transects are surveyed at 7 to 20 meters (23 to 65 feet) apart, with five additional transects surveyed at 30-meter intervals out to 150 meters in adjacent areas in potential habitat (i.e., excluding areas substantially developed for commercial, residential, and/or industrial purposes) (Appendix D in CDFG 2012). With its narrower transect intervals, the tortoise surveys were sufficient to cover the private and Navy sites for burrowing owl.

In an email on July 7, 2026, CEC asked that the 30-meter transects be extended out to 500 meters, 350 meters farther than CDFG (2012) recommended, which corresponds to the action area identified above. These zone of influence, peripheral transects are shown as black dashed lines in Figure 2b and 2c. In the same email, CEC asked that surveys include a 150-meter buffer around kit fox dens, which were covered by the 10-meter and 30-meter transects shown in Figure 2b and 2c.

Surveys of the two areas, labeled as Northern Borrow Pit and Southern Borrow Pit and shown as dark gray polygons in Figure 2b, did not lend themselves to surveys along linear transects. As such, focused burrow surveys were performed in each of these areas that allowed CMBC to find and map all potential burrows and perch sites that may be used by burrowing owls. Existing solar facilities to the north of the proposed Data Center, commercial development to the south, and residential development to the east, west, and south (shown in light gray) all precluded surveys of peripheral transects out to 500 meters in those areas.

The focus of the surveys was to find and inspect all potential perch sites (e.g., dirt hills, concrete and asphalt dump piles, metal and wooden poles, etc.), larger rodent burrows, abandoned kit fox dens, and miscellaneous holes (e.g., post holes, domestic dog digs) that burrowing owls may use. UTM coordinates (NAD 83) were collected for all such potential perch sites, burrows, and kit fox dens, which are mapped in Figure 3b for private lands and Figure 3c for Navy lands. Importantly, this methodology is considered a formal *habitat assessment* for presence of burrowing owls, which can be conducted any time of the year. Since one burrowing owl and diagnostic signs were found, CMBC recommends surveys for wintering owls and breeding surveys during the winter of 2026 and spring/summer of 2027 as outlined in CDFG (2012) to ascertain if there has been any additional burrowing owl activity.

For **Mohave ground squirrel**, some jurisdictions require that habitat assessments be performed by individuals certified by CDFW for trapping the species. Ed LaRue who supervised the fieldwork and drafted this assessment possesses a Mohave ground squirrel Memorandum of Understanding with CDFW, dated January 21, 2020 as an attachment to a scientific collecting permit (SC-001544). The primary assessment herein asks the following questions: (1) Are there records of Mohave ground squirrels in the region and is the site within the known range (Gustafson 1993)? (2) Is there native habitat with a relatively diverse shrub component? And (3) is the site surrounded by development and therefore isolated from potentially occupied habitat?

For **stream courses**, Fish and Game Code Section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW before beginning any activity that will do one or more of the following: (1) substantially divert or obstruct the natural flow of any river, stream or lake; (2) substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake; or (3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. Fish and Game Code section 1602 applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes in the state, including many dry washes in desert regions. CMBC collected data along six drainages to judge their potential as jurisdictional stream courses, including width measurements at three locations along each ditch, the dominant perennial plants, and representative photographs.

Given CEC's guidelines to survey facility impact areas and all areas within 50 meters either side of linear facilities along transects spaced at 10-meter intervals, CMBC is satisfied that all direct impact areas for all special status species have been surveyed. This was particularly important for the proposed SCE lines, which have not yet been specifically located, so 10-meter transects were surveyed throughout a 21-acre± area on private lands including and surrounding SCE's existing substation and conceptual lines out to 50 meters in adjacent areas (outside Navy lands) and an 18-acre± area on Navy lands. The 30-meter transects surveyed out to 500 meters in suitable habitats provided an additional opportunity to detect special status species (e.g., desert tortoise sign and protected plants), although burrowing owl and kit fox were the focal species, which effectively covered areas that may be indirectly impacted.

2.2.2. Field Survey Methods. For a total of approximately 66 survey hours, on July 8, 9, and 10, 2026, Ed LaRue and Susan Seville of CMBC and subcontractor Tracy Bailey surveyed private lands outside China Lake NAWS including proposed sites and adjacent areas as described herein (see Figure 2b). Within the 60-acre± Main Project Area (see Figures 3b and 3c) that includes the proposed Data Center, the three biologists surveyed 54 transects, spaced at 10-meter (30-foot) intervals and oriented along a north-south axis, inclusive of the 50-acre± Project area. As depicted in Figure 2b and described above, where not precluded by existing development, peripheral transects were surveyed for detection of burrowing owls at 30-meter (100-foot) intervals out to 500 meters. Then on September 2, 2026, for approximately 18 hours, LaRue and Bailey surveyed 33 transects on an 18-acre± site on Navy lands, including five peripheral transects at 10-meter intervals around the 9.5-acre± parcel that encompasses SCE facility alignments, and 16 additional peripheral transects at 30-meter intervals out to 500 meters for detection of burrowing owl and other resources (see Figure 2c). Copies of CMBC's data sheets completed in the field and USFWS's (2019) pre-project survey data sheets are included in this report (see Appendix C).

As the Main Project Area was surveyed, LaRue kept tallies of observable human disturbances encountered on 18 of the 54 transects surveyed. Although there were a few dumps and roads on Navy lands, disturbance tallies were not collected there due to the lack of unrestricted human uses. The results of this survey methodology provide *encounter rates* for observable human disturbances. For example, two roads observed on each of 10 transects yields a tally of 20 roads (i.e., two roads encountered 10 times). Habitat quality, adjacent land uses, and this disturbance information are discussed below in Section 3.2 relative to the potential occurrence of Agassiz's desert tortoise and other special status species within the action area.

Weather conditions recorded at the beginning and ending of each survey period included temperatures measured approximately 5 centimeters (2 inches) above the ground, percent cloud cover, and wind speeds measured by a hand-held Kestrel® weather and wind speed meter, as reported in Table 1. Given the high temperatures, surveys on private lands were suspended during the heat of the day, hence two sets of beginning and ending times on July 8 and 9, 2026.

Table 1. Weather Summary Data for the Survey			
Date 2026	Begin to End = Total survey hours*	Weather Conditions	
		Beginning	Ending
Private Lands			
July 8	0615 to 1300 = 20.25	73°F, calm, 0% cloud	100°F, 1 ↑ 3 mph, 0% cloud
July 8	1630 to 1900 = 7.5	103°F, 8 ↑ 11 mph, 0% cloud	100°F, 7 ↑ 10 mph, 0% cloud
July 9	0530 to 1200 = 19.5	63°F, calm, 0% cloud	101°F, 3 ↑ 6 mph, 0% cloud
July 9	1600 to 1830 = 7.5	107°F, 15 ↑ 20 mph, 0% cloud	101°F, 10 ↑ 15 mph, 0% cloud
July 10	0545 to 1100 = 11.0	70°F, calm, 0% cloud	85°F, 1 ↑ 3 mph, 0% cloud
3 days	66 hours	63-107°F, 0 ↑ 20, 0%	85-100°F, 1 ↑ 15, 0%
Navy Lands			
Sept. 3	0645 to 1545 = 18.0	58°F, Calm, 0% cloud	95°F, 6 ↑ 11 mph, 0% cloud
1 day	18 hours	58°F, Calm, 0% cloud	95°F, 6 ↑ 11 mph, 0% cloud

*Total survey hours = 22 hours± multiplied by three for the three biologists surveying private lands = 66 survey hours±, and 9 hours± multiplied by two for the two biologists surveying Navy lands = 18 hours.

All plant and animal species identified during the surveys were recorded in field notes. Garmin® hand-held, global positioning system (GPS) units were used to survey straight-line transects and record Universal Transverse Mercator (UTM) coordinates (North American Datum – NAD 83) for property boundaries and other pertinent information (Appendix C). A digital camera was used to take representative photographs (Appendix D), with locations and directions of exhibits shown in Figures 7 and 8. ©2026 Google™ Earth was accessed via the internet to provide available aerial images of the subject property and surrounding areas (Figure 4).

3.0. Results

3.1. Common Biological Resources. The common plant and animal species identified during the surveys are listed in Appendices A and B, respectively. Based on DeLorme Topo USA® 10.0 software, elevations on private lands range from approximately 737 meters (2,418 feet) at the northwest corner of the Data Center survey area up to 743 meters (2,440 feet) at the southeast corner of the transmission line/fiber optic cable. On Navy lands, elevations range from 739 meters (2,425 feet) along the southern boundary of the impact area survey down to 738 meters (2,421 feet) along the northern boundary. Terrain throughout is desert plain and soils are sandy loam. QK (2025a) reports the Project area as being, "...underlain by sandy soils, which are characteristic of arid, desert environments and often formed in alluvium (sediments deposited by water) and windblown deposits from mixed sources." No blueline streams designated by the U.S. Geological Survey (USGS) occur on either private or Navy lands.

3.1.1. *Common Flora*. The 74 plant species identified during the surveys by CMBC and 71 species identified by EREMICO (2026) both inside and outside China Lake are listed in Appendix A. The dominant vegetation community is comprised of Creosote Bush - White Bursage Scrub with Allscale Scrub (*Atriplex polycarpa* Shrubland Alliance) (Sawyer et al. 2009) occurring on western and southern portions of the Main Project Area, which includes the Data Center (see Figures 3b and 3c) and on Navy lands. Although CMBC disagrees with QK's (2025a) determination that the saltbush scrub community is "Alkali Desert Scrub" (only one of the eight *Atriplex* species listed on page 4-11 of their report is found onsite), Figure 4-3 on page 4-6 of QK's BAR does accurately map the location of the Allscale Scrub community, so it is not delineated herein.

Dominant species of the creosote-bursage community include creosote bush (*Larrea tridentata*) and burrobush (*Ambrosia dumosa*; also called "bursage"), with desert goldenhead (*Acamptopappus sphaerocephalus*), Acton encelia (*Encelia actoni*), spiny hopsage (*Grayia spinosa*), peach thorn (*Lycium cooperi*), and Cooper's goldenbush (*Ericameria cooperi* var. *cooperi*) occurring as subdominants. Dominant species within the saltbush scrub community include, mainly, allscale (*Atriplex polycarpa*), with cheesebush (*Ambrosia salsola*), four-winged saltbush (*Atriplex canescens*), and rubber rabbitbrush (*Ericameria nauseosus*) also occurring.

CMBC found that 16 of 74 identified species (22%) are not native to California, which compares to 12 of 71 species (17%) identified by EREMICO (2026). In either case, the prevalence of non-native plant species in the Project area (particularly on private lands, less so on Navy lands) is indicative of the residential and commercial development in contiguous areas. Athel (*Tamarix aphylla*), which was planted on the site some time ago, and Mexican palo verde (*Parkinsonia aculeata*), which likely colonized the site from adjacent landscaping, are two non-native perennials that would not be found in pristine desert habitats.

3.1.2. *Common Fauna*. The 7 reptile, 18 bird, and 10 mammal species identified during the surveys are listed in Appendix B. Common side-blotched lizard (*Uta stansburiana*) and western whiptail (*Cnemidophorus tigris*) were commonly observed during the surveys, while a single red racer (*Masticophis flagellum piceus*) was observed, a gopher snake (*Pituophis melanoleucus*) skin was found, and sidewinder (*Crotalus cerastes*) tracks were observed both on and off the Navy base. Other locally common reptile species that may occur include zebra-tailed lizard (*Callisaurus draconoides*), long-nosed leopard lizard (*Gambelia wislizenii*), desert horned lizard (*Phrynosoma platyrhinos*), glossy snake (*Arizona elegans*), gopher snake (*Pituophis melanoleucus*), long-nosed snake (*Rhinocheilus lecontei*), and several other rattlesnake species (*Crotalus* spp.).

The bird species observed include those that are either benefitted by or tolerant of human development. Common raven (*Corvus corax*), Eurasian collared-dove (*Streptopelia decaocto*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), and house finch (*Carpodacus mexicanus*) are as common as they are because of residential and commercial development. While mourning dove (*Zenaida macroura*), ash-throated flycatcher (*Myiarchus cinerascens*), western kingbird (*Tyrannus verticalis*), black-throated sparrow (*Amphispiza bilineata*), great-horned owl (*Bubo virginianus*), barn owl (*Tyto alba*), Costa's hummingbird (*Calypte costae*), and horned lark (*Eremophila alpestris*) are found in both developed and pristine desert habitats.

Small mammal species detected on and off base included antelope ground squirrel (*Ammospermophilus leucurus*), kangaroo rat (*Dipodomys* sp.), and Botta pocket gopher (*Thomomys bottae*); medium-sized mammals included Audubon cottontail (*Sylvilagus audubonii*) and black-tailed hare (*Lepus californicus*); and predators included coyote (*Canis latrans*), desert kit fox (*Vulpes macrotis*), American badger (*Taxidea taxus*), and bobcat (*Lynx rufus*). Except for kit fox and American badger, which are not common in heavily developed areas, these are all common mammals species found throughout the desert, including urbanizing areas.

3.2. Uncommon Biological Resources.

3.2.1. *Agassiz's Desert Tortoise*. No tortoise sign was found either onsite or in adjacent areas during this focused protocol survey for the species (USFWS 2019) on private lands outside China Lake NAWS. Based on the absence of tortoise sign within proposed facilities, along linear features, in adjacent areas, and reported from the region (see Figure 3a and 5b), CMBC concludes that Agassiz's desert tortoise is absent from the subject property and action area on private lands. There is limited likelihood of wild tortoises entering the site from adjacent areas to the north on the east side of Highway 395.

Based on CMBC's July 2026 surveys performed on private lands outside China Lake NAWS, QK's (2025a) surveys (i.e., reconnaissance surveys performed in August and November 2025) and focused tortoise surveys performed by CMBC in the area (CMBC 2015, 2016b, 2020, and 2022a), no evidence of living tortoises (e.g., animals, scats, burrows, courtship rings, eggs) has been found on the private land portions of the Project action area. The carcass of a freshly dead adult tortoise was found by CMBC in 2015 near the east-central portion of the solar facility to the north, and in 2020 a second older carcass was found between the proposed RBIDC and developed solar facility (CMBC 2020).

The perimeter fence around Navy lands precludes the types of human development and uses that have resulted in the apparent extirpation of tortoises from private lands throughout the Project area. During the September 2026 surveys, CMBC found 21 older scats (“not this year”) of adult tortoises², 12 fresh scats (“this year”) of adult tortoises, 2 older subadult scats, 1 fresh subadult scat, 2 inactive burrows of an adult tortoise(s), and 1 carcass of an adult male tortoise that died between one and four years ago. As shown in Figure 3d, the tortoise sign is found throughout the area, including one older adult scat within the proposed impact area and two within 50 meters north. These data indicate that there are both adult and subadult tortoises throughout the area on the Navy base, that they are currently present as evidenced by the fresh scat, and that they persist in the area as evidenced by the older scats.

As shown in Figures 3a, 5a, and 5b, prior to surveys of the base, the nearest tortoise sign had been found 2.75 miles south where two carcasses, two burrows, and one scat were found in 1997 (CMBC 1997) and 4.0 miles northwest, where 40 (mostly fresh) scat in 26 accumulations, 6 adult and 2 subadult burrows, 1 subadult tortoise, and 1 carcass were found in 2009 (CMBC 2009). Otherwise, either no tortoise sign or only carcasses have been found during all surveys on private lands in the immediate vicinity of the Project.

Encounter rates for observable human disturbances within the Main Project Area included (in descending order of prevalence) 40 roads, 10 dumps (e.g., mainly asphalt and concrete rubble), 54 cross country vehicle tracks (many of these appeared to have been created by the survey crew who marked the boundaries with survey lath), and 7 domestic dog signs. There are four dirt and concrete rubble piles inside the China Lake fence (Figure 3d), multiple roads (upper portion of Figure 4a), and a pumping facility adjacent to the proposed SCE facilities.

With the publication of the Bureau of Land Management’s (BLM) Record of Decision for the West Mojave Plan (BLM 2006) and the Desert Renewable Energy Conservation Plan (DRECP; BLM 2016) the 1980 California Desert Conservation Area Plan (CDCA Plan; BLM 1980) was revised in significant ways for the conservation and recovery of desert tortoises in the California Deserts. Although desert tortoise critical habitat was not changed (USFWS 1994a), Desert Wildlife Management Areas (DWMAs; USFWS 1994b) and Multiple Use Classes on BLM lands were eliminated by the DRECP. In addition to critical habitat, the two main designated areas under the DRECP CDCA Plan amendment that are intended to provide for tortoise conservation and recovery are Areas of Critical Environmental Concern (ACECs) and California Desert National Conservation Lands (CDNCLs). The subject property is not found within any of these conservation areas.

The subject property is approximately 3.5 miles east of the nearest CDNCL-designated lands in the West Desert and Eastern Slopes CDNCL subarea, which occur on the west side of Highway 14. As per the official DRECP website (www.drecp.org) and Appendix B, which depicts boundaries of management areas, the subject property is located 16 miles± north of the nearest desert tortoise ACEC, which is the Fremont-Kramer ACEC. The site is not found within Agassiz’s desert tortoise critical habitat, which was designated in 1994 (U.S. Fish and Wildlife Service 1994a). The nearest critical habitat area is the Fremont-Kramer Critical Habitat Unit, which is located approximately 16 miles south of the site.

² Scats of adult tortoises are ≥ 12 mm wide, whereas subadult scats are < 12 mm. Burrows of adult tortoises are ≥ 180 mm± wide, whereas subadult burrows are < 180 mm± wide.

3.2.2. *Other Special Status Species.* U.S. Fish and Wildlife Service (2021), California Department of Fish and Wildlife [CDFW 2026a for CNDDDB; CDFW 2026b for Special Plant Species list; CDFW 2026c for Special Animal Species list; and California Native Plant Society (CNPS 2026)] maintain lists of animals and/or plants considered rare, threatened, or endangered, which are herein collectively referred to as “special status species.”

Regulatory agency-designated special status species that were either identified during the current survey; observed on one or more of the sites depicted in Figures 3a, 5a, and 5b; reported from the region to the CNDDDB on the nine USGS 7.5’ quadrangles identified in Section 2.1; assessed by EREMICO (2026); or listed in QK’s BAR (2025a) are assessed herein. Life histories, status designations, and occurrence information for rare species other than desert tortoise, which is addressed above in Section 3.2.1., are given in the following paragraphs in alphabetical order of their common names. Locations are mapped in Figure 5a for CNDDDB reported occurrences and Figure 5b for CMBC reported occurrences. Note that photographs are given below, mostly for plants, only as an information source to facilitate identification during future, botanical surveys.

American badger (*Taxidea taxus*) is listed as a California Species of Special Concern and has no federal designation (CDFW 2026c). This widespread species is found throughout California, except for the very northwestern corner of the state (Zeiner et al. 1990). However, CMBC has observed that badgers are typically absent from urbanizing portions of the desert; so, absence of diagnostic digs outside China Lake NAWS is considered an indicator of relatively degraded habitat quality and proximity to surrounding urban development. Although no diagnostic badger digs were observed off-base during July 2026 surveys, nine digs were observed on the RB Inyokern Solar Project in 2022 (CMBC 2022) where none had been observed in 2015 (CMBC 2015). CMBC suspects that the badger that was there in 2022 is no longer in the area. Twelve (12) badger digs were found inside the fence on China Lake NAWS during the September 2026 surveys, including several within 50 meters of the potential impact area. Given their mobility, it is unlikely that badgers would be directly impacted by Project development, but CDFW may identify minimization or avoidance measures to be sure impacts are avoided.

Beautiful threadplant (*Nemacladus bellus*) is designated by CNPS (2026) as a List 1B.3 plant, which are plants that are rare, threatened, or endangered in California and elsewhere; but not very threatened in California (low degree/immediacy of threats or no threats known). The annual herb blooms from April through July, between 800 and 1,800 meters (2,625 – 5,905 feet) elevation, on granitic gravel or sandy flats, in cismontane woodlands or Joshua tree woodland (CNPS 2026). The exact location is unknown, but the only known



local occurrence was reported at 5,055 feet elevation on the east side of Walker Pass in Joshua tree woodland in 1995. Because it was detectable during EREMICO’s focused surveys but not observed, has only been observed west of Highway 14 in elevations that are several thousand feet higher than the Project area, and woodlands habitats are absent, EREMICO (2026) concludes it is absent from the Project area.

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Big Spring legless lizard (*Anniella campi*) is designated by the CDFW as a California Species of Special Concern and by the U.S. Forest Service as Sensitive. CDFW (2026a) reports that “Microhabitat of this species is poorly known. Other legless lizard species occur in sparsely vegetated areas with moist, loose soil, often found underneath leaf litter, rocks, and logs.” According to CaliforniaHerps.com³, it occurs in moist warm loose soil with plant cover. Moisture is essential. Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks. Leaf litter under trees and bushes in sunny areas and dunes stabilized with bush lupine and mock heather often indicate suitable habitat. Often can be found under surface objects such as rocks, boards, driftwood, and logs. Can also be found by gently raking leaf litter under bushes and trees. Sometimes found in suburban gardens in Southern California. Given that they are restricted to desert canyons and springs along the eastern edge of the Sierra Nevada in Kern and Inyo counties, CMBC concludes that they are absent from the Project area.

Barstow woolly sunflower (*Eriophyllum mohavense*) is not designated as a rare species by either USFWS or CDFW, is a BLM Sensitive species (CDFW 2026b), and is designated by the CNPS (2026) as a List 1B.2 plant, which means that it is considered rare, threatened, or endangered in California and elsewhere; and, specifically, fairly threatened in California (moderate degree/immediacy of threat). This small annual plant is found in chenopod scrub, Mojavean desert scrub, along desert playas, mostly in open silty or sandy areas with saltbush scrub or creosote bush scrub, on barren ridges and adjacent to playas between 200 meters (655 feet) and 605 meters (1,985 feet) elevation (CNPS 2026). The CNDDDB (CDFW 2026a) reports two occurrences in the Robber’s Roost area, approximately 9 and 11 miles west-southwest of the Project area. EREMICO (2026) concluded, that because the Project area, “...lacks shrubless areas and soil crusts. It is unlikely that the Barstow woolly sunflower occurs.”



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Charlotte’s phacelia (*Phacelia nashiana*) is a BLM Sensitive species (CDFW 2026a) and is designated by CNPS (2026) as a List 1B.2 species, which means it is considered rare, threatened, or endangered in California and elsewhere; and, specifically, fairly threatened in California (moderate degree/immediacy of threat). Found only along the eastern side of the Sierras from about California City to Olancho, this strikingly-colored, annual herb blooms from March to June, is typically associated with granitic and sandy soils, and is found in Mojavean desert scrub, Joshua tree woodland, and pinyon-juniper woodland (CNPS 2026). As shown in Figure 5a, there have been 16 locations reported to the CNDDDB



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(CDFW 2026a), with the nearest locations approximately 5.0 miles west (2011), 5.1 miles west-northwest (2003), and 5.8 miles northwest (2019). EREMICO (2026) concluded, “Because the Project Site and associated facilities have no steep slopes or sandy to rocky washes, the Charlotte’s phacelia is unlikely to occur.”

³ <https://californiaherps.com/lizards/pages/a.campi.html>

Crotch's bumble bee (*Bombus crotchii*) is one of four species that in October 2018, the Xerces Society for Invertebrate Conservation, Defenders of Wildlife, and the Center for Food Safety submitted a petition to the California Fish and Game Commission to list the species as endangered under the California Endangered Species Act (CESA). Little is known about its occurrence in the area, except that one was reported 9.2 miles southeast in



Source: bing.com/images

2023. The female bee was observed at Cerro Coso Community College on fennel, which was likely a landscape plant. The surrounding land consists of desert shrubland habitat and private residences. Its likelihood of occurrence is unknown, but CMBC cannot conclude that it is absent from the site. As described below in Section 4.2, CMBC recommends that focused surveys for Crotch's bumble bee be performed in the spring of 2027.

Crowned muilla (*Muilla coronata*) is designated as a List 4.2 species, meaning it is of limited distribution - A watch list; and, specifically, fairly threatened in California (moderate degree/immediacy of threat) (CNPS 2026) and is not designated by CDFW or USFWS. This diminutive annual plant, found between 670 – 1,960 meters (2,200 – 6,430 feet) elevation, blooms in March and April after favorable winter rainfall, and occurs in chenopod scrub, Joshua tree woodland, Mojavean desert scrub, and pinyon and juniper woodland (CNPS 2026). EREMICO (2026) reported that, "It occupies scattered locations throughout the Mojave Desert including areas north of Inyokern along Brown Road (R. Woodard, Independent Biologist, personal communication)," so, "It has a moderate potential for occurrence throughout the Project Site based on the presence of appropriate soil types and proximity to known locations along Brown Road."



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Death Valley sandmat (*Euphorbia vallis-mortae*) is designated by the CNPS (2026) as a List 4.2 plant, which are species of limited distribution - A watch list; and, specifically, fairly threatened in California (moderate degree/immediacy of threat). The perennial herb blooms between May and October, between 230 and 1,460 meters (755 and 4,790 feet) elevation, in Mojavean desert scrub, on gravelly and sandy soils (CNPS 2026). LaBerteaux visited nearby Short Canyon on July 6, 2026 confirming that Death Valley sandmat was present and detectable at the time of her Project area surveys on July 13-15 and September 3, 2026. Since none was found during her focused plant surveys at a time when it was detectable, EREMICO (2026) concluded that it is absent from the Project area.



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Desert bird's-beak (*Cordylanthus eremicus ssp. eremicus*) is designated as a List 4.3 plant, which are species of limited distribution - A watch list; but not very threatened in California (low degree/immediacy of threats or no threats known). The hemiparasitic annual herb blooms from July to October, between 1,000 and 3,000 meters (3,280 and 9,845 feet) elevation, in Joshua tree woodland, Mojavean desert scrub, and pinyon and juniper woodland (CNPS 2026). EREMICO (2026) concluded it is absent because the Project area lacks suitable woodlands habitat.



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Gilman's goldenbush (*Ericameria gilmanii*) is designated by the BLM as Sensitive, by the U.S. Forest Service as Sensitive, and by the CNPS (2026) as a List 1B.3 species, which means that it is rare, threatened, or endangered in California and elsewhere; but not very threatened in California (low degree/immediacy of threats or no threats known). It is a



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perennial shrub, blooming from August to September, between 2,100 and 3,400 meters (6,890 – 11,155 feet) elevation, in subalpine coniferous forest and upper montane coniferous forest, on rocky substrates that are sometimes limestone or granite (CNPS 2026). As a shrub, it would have been detected in present, and is therefore considered to be absent, which was confirmed by EREMICO (2026).

Golden eagle (*Aquila chrysaetos*) is designated as a BLM Sensitive species, as a Watch List and Fully Protected species by CDFW (2026c), and as a Bird of Conservation Concern by the USFWS (2021). The CNDDB (CDFW 2026a) reports two occurrences 6.1 miles west (1978) and 6.9 miles west (1977). Golden eagles have not been observed on any of the 38 surveys performed by CMBC since 1991 (Figure 5b), likely because of the urbanization occurring adjacent to most survey areas. There are no suitable nesting substrates in the Project area for golden eagles and foraging is unlikely because of residential and commercial development in contiguous areas. Golden eagles would not nest or hunt in the Project area, and would not be adversely affected by Project development.

Hall's daisy (*Erigeron aequifolius*) is designated by the BLM as Sensitive, by the U.S. Forest Service as Sensitive, and by the CNPS (2026) as a List 1B.3 species, which means that it is rare, threatened, or endangered in California and elsewhere; but not very threatened in California (low degree/immediacy of threats or no threats known). It is a



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perennial rhizomatous herb, blooming between June and August, between 1,500 and 2,440 meters (4,920 and 8,005 feet) elevation, in broad-leaved upland forest, lower and upper montane coniferous forest, and in pinyon and juniper woodland (CNPS 2026). Given the lower elevations of the Project area, the lack of suitable habitat, and the stature of the plant, which would have been blooming during LaBerteaux's July 2026 surveys, EREMICO (2026) determined the species is absent.

Inland gilia (*Gilia interior*) is designated by CNPS (2026) as a List 4.3 plant, which are species of limited distribution - A watch list; but not very threatened in California (low degree/immediacy of threats or no threats known). The annual herb blooms March to May,



between 700 and 1,700 meters (2,295 and 5,580 feet), in cismontane woodland, Joshua tree woodland, and lower montane coniferous forest, on rocky substrates (CNPS 2026). EREMICO (2026) concluded that the habitat in the Project area is not rocky enough to be suitable for the species, which is deemed to be absent.

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Inyo onion (*Allium atrorubens* var. *cristatum*) is designated by CNPS (2026) as a List 4.3 plant, which are species of limited distribution - A watch list; but not very threatened in



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California (low degree/immediacy of threats or no threats known). The perennial bulbiferous herb blooms from April to June, between 1,200 and 2,560 meters (3,935 and 8,400 feet) elevation, in Joshua tree woodland, Mojavean desert scrub, and pinyon and juniper woodland, on rocky and sandy substrates (CNPS 2026). EREMICO (2026) concluded that the species is absent from the Project area because it is restricted to high desert mountainous areas, which are lacking from the area.

Kern County evening-primrose (*Camissonia kernensis* ssp. *kernensis*) is a CNPS (2026)



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List 4.3 plant, which includes species of limited distribution. It grows in sandy or gravelly granitic soils at elevations ranging from 790 m to 2,130 meters 2,590 to 6988 feet) elevation, a little higher than the Project Site. In the vicinity of the Project, it is known to occur on the east slope of the Southern Sierra Nevada (Freeman Canyon and Short Canyon) and the El Paso Mountains (Jepson Flora Project). Due to the presence of sandy soils in the Project area, EREMICO (2026) concludes it has some potential to occur.

Kit fox (*Vulpes macrotis*), as a fur-bearing mammal, is Fully Protected by CDFW (2026c) and has no status with USFWS. The desert kit fox is protected under Title 14 of the California Code of Regulations §460, which states that “Fisher, marten, river otter, desert kit fox and red fox may not be taken at any time.” Kit fox is an uncommon to rare, permanent resident of arid regions of the southern half of the state, where they live in vegetation dominated by scattered brush, shrubs, and scrub. Kit fox dens were specifically sought and inspected for evidence of burrowing owl. Based on the kit fox sign found at all other dens, particularly scats, CMBC believes that none of the dens mapped in Figure 3b were active, which makes them suitable for burrowing owls but also indicates that kit foxes are currently not denning on private lands in the action area. On Navy lands, three of the five kit fox dens were considered to be active, which is another indicator (in addition to the prevalence of tortoise sign) that Navy lands are sufficiently protected and undisturbed to support kit foxes and other regionally rare species (e.g., American badger).

Latimer’s woodland-gilia (*Saltugilia latimeri*) is designated by the BLM as Sensitive, by the U.S. Forest Service as Sensitive, and by the CNPS (2026) as a List 1B.2 species, which means that it is rare, threatened, or endangered in California and elsewhere; and, specifically, fairly threatened in California (moderate degree/immediacy of threat). This annual herb blooms from March to June, between 400 and 1,900 meters (1,310 and 6,235



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feet) elevation, in chaparral, Mojavean desert scrub, and pinyon and juniper woodland, often on granitic soil, and sometimes on rocky and sandy soils in washes (CNPS 2026). The two occurrences reported to the CNDDDB (CDFW 2026a), from 5.1 and 8.9 northwest both in 2003 are on steep mountainous slopes, and few of the affiliated plants are found in the Project area. EREMICO (2026) concluded, “Due to the absence of slopes on the Project Site, it has no potential for occurrence.”

LeConte's thrasher (*Toxostoma lecontei*) is designated as a Candidate Species for Listing by CDFW (2026c) and as a Bird of Conservation Concern by the USFWS (2021). A LeConte's thrasher was observed on the 120-acre Habitat Management Lands (CMBC 2017) located 5.6 miles southwest of the Project area. The silver cholla (*Cylindropuntia echinocarpa*) and peach thorn (*Lycium cooperi*) found in the Project area are suitable nesting habitat. However, to date, no LeConte's thrashers have been observed onsite or in adjacent areas during multiple surveys (2015, 2016b, 2020, and 2022). It is likely that the prevalence of commercial and residential development in the area is too disruptive for LeConte's thrashers to persist on private lands in the Project area. Given this information, CMBC concludes that LeConte's thrasher is currently absent from private lands and has a low likelihood of occurrence on Navy lands.

Limestone dudleya (*Dudleya abramsii* ssp. *calicicola*) is designated as a List 4.3 plant, which are species of limited distribution - A watch list; but not very threatened in California (low degree/immediacy of threats or no threats known). The perennial herb blooms April through August, between 500 and 2,600 meters (1,640 and 8,530 feet) in chaparral and pinyon and juniper woodland, only on carbonate substrates (CNPS 2026). EREMICO (2026) concluded that there are no suitable habitats in the Project area for this species, which is considered to be absent.



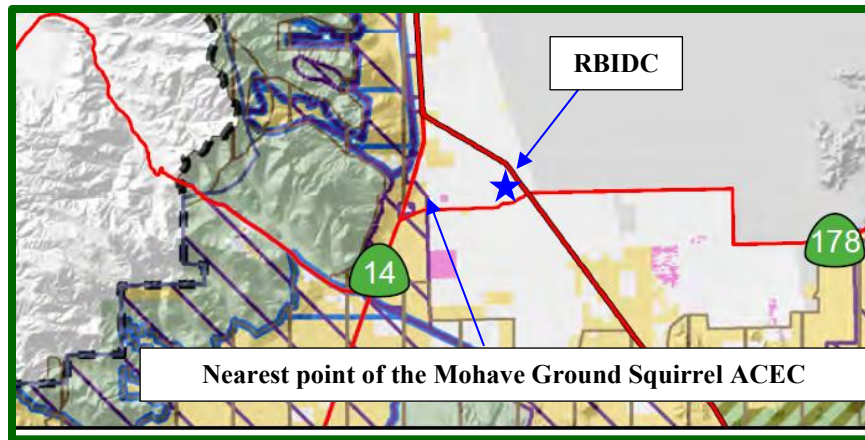
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Loggerhead shrike (*Lanius ludovicianus*) is designated as a California Species of Special Concern by CDFW (2026c) and a Bird of Conservation Concern by the USFWS (2021). Although not observed during the July 2026 surveys, shrikes have been identified on nine different sites in the Indian Wells Valley, as mapped in Figure 5b, and one was observed on China Lake NAWS on September 3, 2026 (see Figure 3d). There are not any nesting sites in the Project area for shrikes although there are suitable foraging habitats. They are somewhat tolerant of human development and may nest in landscaped plants in adjacent areas. Given these observations, CMBC concludes that loggerhead shrikes occur in the area but that impacts, if any, would be negligible and not constitute a CEQA-significant impact.

Mohave ground squirrel is designated as a Threatened species by the California Fish and Game Commission and is not federally listed. Despite two petitions, one in 1993 and another in 2005, to list the Mohave ground squirrel as a federally Endangered species, the USFWS ruled in both instances that listing was not warranted at those times. In December 2024, there was a new petition to federally list the Mohave ground squirrel and to establish critical habitat. In January 2025, the USFWS accepted the petition and is currently in the process of gathering data to see if the listing is warranted.

The DRECP identified a Mohave Ground Squirrel ACEC that is located approximately 2.5 miles west of the Project area, as shown in the following figure (Source: Page 762 in the footer link⁴ shown as the diagonal, purple crosshatch).

⁴ <https://www.dropbox.com/scl/fi/ggijmr0m0azshevrij9q3/West-Desert-and-Eastern-Slopes-Subregion-App-B.pdf?rlkey=71vm7icvr573r84e3ne0o8pu1&dl=0>



Given Mohave ground squirrel reports in the region (Figures 5a and 6) and site surveys, CMBC (2015) judged that habitats on the then-proposed RB Inyokern Solar Project site located about 500 feet to the north of the proposed RBIDC were suitable for Mohave ground squirrel, so protocol trapping (CDFW 2003 revised 2010) was conducted in April 2018 when a pregnant Mohave ground squirrel was captured on the first day of the trapping effort.

This finding led to CMBC (2019) drafting a 2081 incidental take permit application on behalf of RLC. The incidental take permit (CDFW 2022) was signed on July 22, 2022. With input from CDFW, 192 Sherman live traps were placed throughout the solar site at 60-meter intervals and trapped from June 2 to 11, 2023. An adult female, post-lactating Mohave ground squirrel was trapped on June 2, 2023 at UTM coordinates 11S 0424520 East, 3945830 North (North American Datum – NAD 83). The Mohave ground squirrel was transferred to a specified release location on conservation property owned by the Desert Tortoise Preserve Committee (DTPC) (11S 0421943 East, 3940081 North) and released three hours after capture. No additional Mohave ground squirrels were trapped during the subsequent nine days. The Proponent assumes that Mohave ground squirrels are present, particularly on Navy lands, so no additional field data were collected.

Mohave tui chub (*Siphateles bicolor mohavensis*) is designated by both the CDFW and USFWS as Endangered. In the wild, the species is endemic to the Mojave River basin, adapted to alkaline, mineralized waters, needing deep pools, ponds, or slough-like areas and vegetation for spawning. In the China Lake area, they are restricted to the Lark Seep system, including G-1 Seep to the north and Lark Seep to the south, which are connected by a network of manmade channels, seeps, and marshland. This is one of few successful experimental transplant sites outside of native range, and likely the largest population. Given its habitat restrictions, the species is absent from the Project area.

Mojave fish-hook cactus (*Sclerocactus polyancistrus*) is designated as a List 4.2 species, meaning it is of limited distribution - A watch list; and, specifically, fairly threatened in California (moderate degree/immediacy of threat) (CNPS 2026) and is not designated by CDFW, USFWS, or BLM (although BLM has established an ACEC for the species near Helendale). This small (8 to 12”) columnar cactus, usually with a single barrel, is a perennial stem succulent that blooms between April and July. It is differentiated from

similar columnar cacti [hedgehog cactus (*Echinocereus engelmannii*) and foxtail cactus (*Coryphantha* sp.), for example] by longer, fish-hook-shaped spines that extend beyond the tight clusters of spines. Its elevational range is from approximately 640 meters to 2,320 meters in Joshua tree woodland and Mojavean desert scrub. Although sometimes associated with carbonate substrates, it is also found on rocky and cobbly hillsides on noncarbonated soils. Neither EREMICO (2026) nor CMBC found any plants, and conclude that the species is absent from the Project area.



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Mojave tarplant (*Deinandra mohavensis*) is designated as an Endangered species by the California Fish and Game Commission, has no USFWS designation, but is designated as Sensitive by both the BLM and U.S. Forest Service. CNPS (2016) designates it as a List 1B.3 plant, which are rare, threatened, or endangered in California and elsewhere; but not very threatened in California (low degree/immediacy of threats or no threats known). This annual herb blooming from June to October occurs between 640 and 1,600 meters (2,100 and 5,250 feet) elevation, grows in chaparral, coastal scrub, and riparian scrub in mesic habitats (CNPS 2026). LaBerteaux visited nearby Short Canyon on July 6, 2026 confirming that Mojave tarplant was present and detectable at the time of her surveys in July and September. Since none was found during her focused plant surveys and there are no mesic habitats suitable for the plant, EREMICO (2026) determined the species to be absent from the Project area.



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The overwintering population of **monarch butterfly** (*Danaus plexippus plexippus*) is Proposed Threatened by CDFW and is designated as Sensitive by the U.S. Forest Service. QK (2025a) reported that, “Monarchs occur in various open habitats, including fields, meadows, weedy areas, marshes, and roadsides. Adults make massive migrations from August to October, flying thousands of miles south to hibernate along the California coast and in central Mexico. Eggs are laid, and larvae feed on plants in the milkweed family, primarily *Asclepias* sp., but also other genera, including *Calotropis*, *Cynanchum*, *Gonolobus*, and *Sarcostemma*. Adult butterflies typically live from two to six weeks, but overwintering individuals may live as long as nine months. Overwintering migratory adults will roost in large colonies in forested sites in California and Mexico, which must provide protection from the elements and assist with thermoregulation. There are no CNDDB occurrences within 10 miles of the BSA [biological study area]. Suitable overwintering habitat is absent, and preferred host plants were not observed.” Given this information, CMBC concludes overwintering monarchs are absent from the site, no impacts are anticipated, and no mitigation is recommended.



Source: www.skyechooks.com

Muir's tarplant (*Carlquistia muirii*) is designated by the BLM as Sensitive, by the U.S. Forest Service as Sensitive, and by the CNPS (2026) as a List 1B.3 species, which means that it is rare, threatened, or endangered in California and elsewhere; but not very threatened in California (low degree/immediacy of threats or no threats known). This perennial rhizomatous herb blooms from July through October, between 755 and 2,500 meters (2,475 and 8,205 feet) elevation, in chaparral (montane), lower montane coniferous



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forest, and upper montane coniferous forest on granitic soils (CNPS 2026). Given its stature, that it was blooming during both of EREMICO's surveys, and the absence of suitable habitats, EREMICO (2026) concluded that the, "Project Site has no habitat for this species."

Needle's buckwheat (*Eriogonum breedlovei* var. *shevockii*) is designated as a List 4.3 plant, which are species that are of limited distribution - A watch list; but not very threatened in California (low degree/immediacy of threats or no threats known). This perennial herb, blooming from July through September, between 1,615 and 2,575 meters



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(5,300 and 8,450 feet) elevation, in pinyon and juniper woodland and upper montane coniferous forest, on granitic and rocky soils (CNPS 2026). Given its stature, it would have been detectable during EREMICO's (2026) surveys, and because suitable habitats are not present, it is considered to be absent from the Project area.

Nine Mile Canyon phacelia (*Phacelia novenmillensis*) is designated as a List 1B.2 plant, which are species rare, threatened, or endangered in California and elsewhere; and, specifically, fairly threatened in California (moderate degree/immediacy of threat). The annual herb blooms from May to June, between 1,645 and 2,640 meters (5,395 and 8,660 feet) elevation, in broad-leaved upland forest, cismontane woodland, pinyon and juniper



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woodland, and upper montane coniferous forest, usually under litter of oaks (*Quercus chrysolepsis*), on granitic and sandy substrates (CNPS 2026). EREMICO (2026) has determined that there are no habitats within the Project area, so the species is determined to be absent.

Osprey (*Pandion haliaetus*) is designated as a Watch List species by CDFW (2026c) and has no federal designation. Ospreys are occasionally observed in open desert scrub habitats as they are traveling between water bodies, including lakes, ponds, streams, and rivers. Although no observations have been reported to the CNDDDB, CMBC (2010) observed one approximately three miles east over a pipeline. Since ospreys prey on fish (i.e., they are also referred to as "fish-eating eagles"), they are considered to be incidental anytime they are observed during upland desert surveys. Data Center development would not result in any impacts to ospreys.

Owen's Peak lomatium (*Lomatium shevockii*) is designated by the BLM as Sensitive as by the CNPS (2026) as a List 1B.2 species, which are plants that are rare, threatened, or endangered in California and elsewhere; and, specifically, fairly threatened in California (moderate degree/immediacy of threat). This perennial herb that blooms in April and May is found between 1,770 and 2,535 meters (5,805 and 8,315 feet) elevation, in lower and upper montane coniferous forests, on rocky substrates (CNPS 2026). EREMICO (2026) determined there are no suitable habitats within the Project area, so the species is determined to be absent.



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Pale-yellow layia (*Layia heterotricha*) is designated as Sensitive by both the BLM and U.S. Forest Service, and is considered by CNPS (2016) to be a List 1B.1 plant, which are rare, threatened, or endangered in California and elsewhere; and, specifically, seriously threatened in California (high degree/immediacy of threat). This annual herb that blooms from March through June is found between 300 and 1,705 meters (985 and 5,595 feet) elevation, in cismontane woodland, coastal scrub, pinyon and juniper woodland, and valley and foothill grassland, on alkaline and clay soils (CNPS 2026). EREMICO (2026) determined that since, "Neither alkaline nor clay soils were noted in the Botanical Survey Area; therefore, this species is unlikely to occur."



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Pine fritillary (*Fritillaria pinetorum*) is designated as List 4.3 plant, which are species of limited distribution - A watch list; but not very threatened in California (low degree/immediacy of threats or no threats known). The perennial bulbiferous herb blooms May through July between 1,735 and 3,300 meters (5,695 and 10,825 feet) in chaparral, lower and upper montane coniferous forest, pinyon and juniper woodland, and subalpine coniferous forest, on granitic and metamorphic substrates (CNPS 2026). EREMICO (2026) concluded that the species is absent due to lack of suitable habitats.



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Prairie falcon (*Falco mexicanus*) is designated as a Watch List species by CDFW (2026c) and a Bird of Conservation Concern by the USFWS (2021). Although not observed during the survey, prairie falcons have been reported in four locations to the CNDDDB (CDFW 2026a), which does not disclose the location of this species to protect nesting sites. There are no suitable nesting substrates (cliff faces and other inaccessible areas) onsite but there is potential for prairie falcon to depredate prey in the Project area. CMBC observed one approximately 4.8 miles north over agricultural fields (CMBC 2007) and five miles southeast (CMBC 1997) adjacent to a residential area. Prairie falcon may forage onsite but would not nest there.

Rose-flowered larkspur (*Delphinium purpusii*) is designated as Sensitive by both the BLM and U.S. Forest Service, and is designated by the CNPS (2026) as a List 1B.3 plant, which are rare, threatened, or endangered in California and elsewhere; but not very threatened in California (low degree/immediacy of threats or no threats known). This



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perennial herb blooms in March and April, between 300 and 1,340 meters (985 and 4,395 feet) elevation, in chaparral, cismontane woodland, and pinyon and juniper woodland, often on carbonate and rocky soils (CNPS 2026). EREMICO (2026) determined that there are no suitable habitats present for this species in the Project area, so the species is determined to be absent.

Sharp-shinned hawk (*Accipiter striatus*) is designated as a Watch List species by CDFW (2026c) and has no federal status. This hawk is very similar to Cooper's hawk in both appearance and ecology, however, unlike Cooper's hawk, sharp-shinned hawks are migrants and seasonal residents to southern California, except for a few places in the San Bernardino and San Gabriel mountains (Zeiner et al. 1990). CMBC (1997) observed one approximately 2.75 miles south (Figure 5b) along a pipeline survey conducted in 1997. Since they do not nest in the Mojave Desert, there are not any nesting sites on the subject property but there are foraging habitats throughout, and smaller birds, reptiles, and insects on which they can prey. Even so, CMBC judges that Project development would not constitute a significant impact to sharp-shinned hawks.

Short-bracted bird's-beak (*Cordylanthus rigidus* ssp. *brevibracteatus*) is designated as a List 4.3 plant, which are species of limited distribution - A watch list; but not very threatened in California (low degree/immediacy of threats or no threats known). The



Source: Calflora

hemiparasitic annual herb blooms in July and August, between 610 and 2,590 meters (2,000 and 8,500 feet) elevation, in chaparral, lower and upper montane coniferous forest, and pinyon and juniper woodland, on granitic soils in canopy openings (CNPS 2026). EREMICO (2026) concluded that the species requisite habitats do not occur in the Project area, so it is absent.

Spanish needle onion (*Allium shevockii*) is designated as Sensitive by the BLM and is designated by the CNPS (2026) as a List 1B.3 plant, which are rare, threatened, or endangered in California and elsewhere; but not very threatened in California (low degree/immediacy of threats or no threats known). The



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perennial bulbiferous herb blooms in May and June, between 850 and 2,500 meters (2,790 and 8,205 feet) elevation, in pinyon and juniper woodland and upper montane coniferous forest, on rocky soils (CNPS 2026). EREMICO (2026) determined there are no suitable habitats in the Project area and that the species is therefore absent.

Spotted bat (*Euderma maculatum*) is designated as a California Species of Special Concern and as a Sensitive species by the BLM (CDFW 2026a). The CNDDDB (CDFW 2026a) reports that the species occupies a wide variety of habitats from arid deserts and grasslands through mixed conifer forests, that it feeds over water and along washes, feeding almost entirely on moths, and needing rock crevices in cliffs or caves for roosting. CDFW (2026a) reported that a specimen was collected at China Lake NAWS in 1956. Given that there are no open bodies of water for foraging and no suitable roosting sites, CMBC concludes that spotted bat is absent from the Project area.

Swainson's hawk (*Buteo swainsoni*), which is listed as a Threatened species by the California Fish and Game Commission (CDFW 2026c) and as a Bird of Conservation Concern by the USFWS (USFWS 2021), has not been reported in the region to the CNDDDB. One was observed in 2015 incidentally flying over the adjacent solar site (CMBC 2015). As a migratory species, Swainson's hawks may be observed in numerous places as they pass through the desert, which is likely the case for the one observed in 2015 by CMBC. There have been nesting attempts at the Desert Tortoise Research Natural Area some 30 miles south of the Project area (Bill Boorman, personal communication) and there are few but persisting records of nesting attempts by Swainson's hawks in the western parts of Lancaster, but none is known to nest in the Indian Wells Valley. Swainson's hawk would not nest onsite and not likely forage there (they tend to prefer fallow agricultural fields and other open desert areas), so CMBC concludes that the proposed Project would not adversely affect the species.

Sweet-smelling monardella (*Monardella beneolens*) is designated as Sensitive by both the BLM and U.S. Forest Service, and is designated by the CNPS (2026) as a List 1B.3 plant, which are rare, threatened, or endangered in California and elsewhere; but not very threatened in California (low degree/immediacy of threats or no threats known). This perennial rhizomatous herb that blooms between June and September, between 2,475 and 3,500 meters (8,120 and 11,485 feet) elevation, in alpine boulder and rock fields, subalpine coniferous forest, and upper montane coniferous forest, on granitic soils (CNPS 2026). Given the stature of the plant, the fact that it was blooming and detectable in July and September 2026, and because there are no suitable habitats (EREMICO 2026), the species is presumed to be absent from the Project area.



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Townsend's big-eared bat (*Corynorhinus townsendii*) is designated as a California Species of Special Concern and as a Sensitive species by BLM and U.S. Forest Service (CDFW 2026c). Found throughout California in a wide variety of habitats, most common at mesic sites, roosting in the open, hanging from walls and ceilings. Roosting sites are a limiting factor, and Townsend's big-eared bats are extremely sensitive to human disturbance. Although not reported to the CNDDDB (CDFW 2026a), QK (2025a) lists it as a species of concern. CMBC concurs with QK that there are no roosting habitats within the Project area. No impacts are expected and no mitigation measures recommended.

Since October 25, 2024, the **western burrowing owl** is a Candidate Species for Listing under the CESA (Cal. Reg. Notice Register 2024, No. 43-Z, p. 1400), designated as Sensitive by the BLM (CDFW 2026c), and a USFWS-designated Bird of Conservation Concern (USFWS 2021). At the State level, it receives the same legal protection afforded to an Endangered or Threatened species (Fish & G. Code, §§ 2074.2 & 2085). It is illegal to import, export, take (hunt, pursue, catch, capture, or kill, or attempt to do so), possess, purchase, or sell western burrowing owl or any part or product thereof (Fish & G. Code, §§ 86, 2080, 2085). Western burrowing owl is also designated as a Bird of Conservation Concern by the USFWS (2021) and is considered Sensitive by the BLM (CDFW 2026c).

It is one of the focal species specifically sought during field surveys and is usually detected by regurgitated pellets, distinctive feathers, zygodactyl (x-shaped) tracks, and whitewash (fecal material that may be deposited by other bird species). Although pellets and feathers are sufficiently distinctive that they may be identified away from burrows, it is one or more of these signs at sufficiently large burrows that are the most definitive means of determining burrowing owl use of a given site.

Potential perch sites both on private lands and China Lake NAWS in the Project area include metal and wooden poles, dirt piles, and debris piles of concrete and asphalt. Potential burrow sites include inactive kit fox dens, badger digs (only on the base), canid (domestic dog) digs, larger rodent burrows that could accommodate owls, post holes, and miscellaneous manmade structures including two dirt borrow pits and a cement retention basin on private lands. Each of these potential “resources” was closely inspected for burrowing owl sign and is mapped in Figure 3b for private lands and Figure 3d for Navy lands. CMBC does not anticipate any additional surveys on China Lake NAWS until which time incidental take permit (ITP) measures are implemented, so only those burrowing owl resources observed on private lands are listed below in Table 2. These data are provided to facilitate additional surveys before ground disturbance occurs.

In the case of private lands, in July 2026, older burrowing owl sign was found south of the substation and at the “Northern Borrow Pit” as shown in Figure 3b and tabulated below in Table 2, both of which provide codes for potential burrowing owl resources. Definitive burrowing owl sign was found in four places, three of which were in the Northern Borrow Pit. Importantly, none of the signs was fresh and some of it was inconclusive. Whitewash in the absence of burrowing owl pellets, for example, may be produced by various bird species, so older pellets were the only unambiguous sign found in July 2026 on private lands.

Despite the amount of potential burrowing owl resources inspected in July, pellets were found in only four places, and none of them was fresh. There was no definitive, unambiguous evidence that burrowing owls then occupied the Project area. Old evidence of the two family groups (Exhibits 23 and 24 in Appendix D) that occupied the Northern Borrow Pit between 2015 and the 2023 construction of the RB Inyokern Solar Project is still there but none of it was fresh in July 2026. Interestingly, QK’s (2025b) final mitigation report for the RB Inyokern Solar site did not mention burrowing owl, which CMBC (2022) considered to be one of the most important issues affecting solar site development, which occurred between 2024 and 2025.

During the subsequent visit on September 2, 2026, LaRue flushed a single burrowing owl from an inactive kit fox den in the Northern Borrow Pit. There was fresh white wash at this den that had not been there in July 2026, and there was also fresh white wash at the base of two metal poles where older white wash had occurred in July 2026 (both mapped in Figure 3b). A fresh pellet and white wash along with an owl feather were found on China Lake NAWS, but no owl sign was found at the 12 badger digs or two inactive kit fox dens mapped in Figure 3d.

The detailed data given in Table 2 are provided as a tool to facilitate future surveys on private lands prior to ground disturbance to continue to assess the Project area for the presence of either resident or migratory burrowing owls. Canid digs and rodent burrows are ephemeral and may not be present for future inspection, but most of the other resources are permanent enough that they can be revisited at future dates within the next year before ground disturbance occurs.

Table 2. Burrowing Owl Resources found in 2026

Codes	Resource	Easting	Northing	Description - Findings
PE @ KF	Pellets @ kit fox den	427903	3945443	Inactive den – Old pellets, no whitewash
PE @ KF	Pellets @ kit fox den	427114	3945818	Inactive den – Old pellets, no whitewash
PE @ KF	Pellets @ kit fox den	427111	3945814	Inactive den – Old pellets, no whitewash
WW @ KF	Whitewash @ kit fox den	427118	3945821	Inactive den – Whitewash, no pellets
WW @ PS	Whitewash @ perch site	427048	3945812	Metal pole – Whitewash, no pellets
WW, PE @ PS	Whitewash, pellets @ perch site	427040	3945805	Metal pole – Old pellets, whitewash
WW @ PS, DP	Whitewash @ Perch site, debris pile	426443	3945554	Concrete pile – Whitewash, no pellets
CD	Canid dig	427915	3944968	Older dog dig – 0 sign
CD	Canid dig	427897	3945893	Canid dig – 0 sign
CD	Canid dig	427524	3945350	Domestic dog dig – 0 sign
DP	Dirt Pile	426460	3945580	Dirt pile – 0 sign
DP	Dirt pile	427783	3945047	Dozen soft dirt piles – 0 sign
DP	Debris pile	426703	3945224	Asphalt debris pile – 0 sign
DP	Debris pile	426730	3945225	Concrete rubble pile – 0 sign
DP	Debris pile	426766	3945237	Concrete rubble pile – 0 sign
DP	Debris pile	426910	3945356	Column of rocks – 0 sign
DP	Debris pile	427010	3945401	Concrete rubble pile – 0 sign
KF	Kit fox den	427878	3945028	Inactive den – 0 sign
KF	Kit fox den	427664	3945667	Inactive den – 0 sign
KF	Kit fox den	427114	3945821	Inactive den – 0 sign
KF	Kit fox den	427113	3945819	Inactive den – 0 sign
KF	Kit fox den	427077	3945819	Inactive den – 0 sign
KF	Kit fox den	427075	3945822	Inactive den – 0 sign
KF	Kit fox den	427032	3945814	Inactive den – 0 sign
KF	Kit fox den	427909	3945191	Inactive den – 0 sign
KF	Kit fox den	427923	3945192	Inactive den – 0 sign
PH	Post hole	427399	3945501	Larger post hole – 0 sign
PH	Post hole	428090	3945741	Larger post hole – 0 sign
PS	Perch site	427801	3945850	Miscellaneous perch site – 0 sign
PS	Perch site	427687	3945072	Miscellaneous perch site – 0 sign
RO	Rodent burrow	427346	3945283	Larger burrow – 0 sign
RO	Rodent burrow	427662	3945226	Larger burrow – 0 sign
RO	Rodent burrow	427901	3945197	3 larger burrows – 0 sign
RO	Rodent burrow	427919	3945192	2 larger burrows – 0 sign
RO	Rodent burrow	427970	3945179	Larger burrow – 0 sign
RO	Rodent burrow	427930	3945189	Larger burrow – 0 sign
RB	Retention basin	427589	3944874	Abandon retention basin – 0 sign

Western Joshua tree (*Yucca brevifolia*) is currently listed by the CDFW as a Candidate Species for Listing as Endangered. The Western Joshua Tree Conservation Act of 2023 (WJTCA) [Fish and Game Code section 1927.3, subdivision (a)(1)] prohibits take of western Joshua trees in California. No Joshua trees occur within the Project area, so no impacts are anticipated and no mitigation measures are applicable.

White pygmy-poppy (*Canbya candida*) is designated as a CNPS List 4.2 species, which means it is of limited distribution - A watch list; and, specifically, fairly threatened in California (moderate degree/immediacy of threat) (CNPS 2026). The species is found in Joshua tree woodland and Mojavean desert scrub between 600 meters (1,970 feet) and 1,460 meters (4,790 feet) elevation (CNPS 2026). EREMICO (2026) concluded, “Due to the presence of sandy soils throughout the Project area, it has a moderate potential for occurrence,” and should therefore be sought during any subsequent springtime surveys.



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Yellow-eared pocket mouse (*Perognathus mollipilosus xanthonotus*) is designated as Sensitive by the BLM and not designated by either CDFW or USFWS. CDFW (2026a) reports that the species is known only from four canyons in the Tehachapi Mountains, in northeastern Kern County, at an elevational range of between 1,220 and 1,615 meters (4,000 and 5,300 feet), in desert shrub and Joshua tree communities with scattered pinyon pines, occupying underground burrows when inactive. One occurrence is 8.9 miles west-northwest in 1974 in Indian Wells Canyon with a second one 11 miles west in 1975 in the east side of Freeman Canyon. Given that all known occurrences are from canyons along the eastern face of the Scodie Mountains and the Sierras, CMBC concludes the species is absent from the Project area.

Yuma myotis (*Myotis yumanensis*) is designated as Sensitive by the BLM and is not designated by either CDFW or USFWS. CDFW (2026a) indicates that optimal habitats are open forests and woodlands with sources of water over which to feed, with distributions closely tied to bodies of water, and maternity colonies in caves, mines, buildings, and crevices. According to Bat Conservation International⁵, Yuma myotis typically forages over water in forested areas and is threatened by loss of riparian habitats and the decline in permanent water sources in the southwest. CDFW (2026a) reports that one was detected in 1998 northeast of China Lake, near Knox Road, approximately 9.5 miles east of the Project area. Given that there are no open bodies of water for foraging and no suitable roosting sites, CMBC concludes that spotted bat is absent from the Project area.

⁵ <https://www.batcon.org/bat/myotis-yumanensis/>

Table 2 summarizes the 46 species described above, alphabetized by common names; reporting State, federal (BLM = Bureau of Land Management, USFS = U.S. Forest Service, USFWS = U.S. Fish and Wildlife Service), and (for plants) California Native Plant Society (CNPS) designations; habitat preferences [for plants, taken from EREMICO (2026)]; and likelihood of occurrence.

Table 2. Summary of special status species reported from the region			
Common and Scientific names	State, Federal, CNPS designations	Habitat Preferences	Likelihood of occurrence
American badger <i>Taxidea taxus</i>	CDFW: Species of Special Concern Federal: None	Creosote bush scrub	Absent on private lands Present on Navy lands
Beautiful threadplant <i>Nemacladus bellus</i>	CDFW and Federal: None CNPS: List 1B.3	800-1,800 m. Granitic gravel or sandy flats. Cismontane woodland, Joshua tree woodland. 1995 record east of Walker Pass in Joshua tree woodland.	Absent from Project area
Big Spring legless lizard <i>Anniella campi</i>	CDFW: Species of Special Concern USFS: Sensitive	Beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks.	Absent from Project area
Barstow woolly sunflower <i>Eriophyllum mohavense</i>	CDFW: None BLM: Sensitive CNPS: List 1B.2	500-950 m. Gravelly, silty, sandy, or clay soils on level or sloping terrain, as well as in low-lying areas. Chenopod scrub, Mojavean scrub, playas. Known to occur near Soldier Spring.	Absent from Project area
Charlotte's phacelia <i>Phacelia nashiana</i>	BLM: Sensitive CNPS: List 1B.2	600-2,200 m. Usually granitic, sandy or rocky areas on steep slopes or flats. Joshua tree woodland, Mohavean desert scrub; pinyon and juniper woodland. Known to occur in and below canyons on the east slope of the Sierra Nevada.	Absent from Project area
Crotch's bumble bee <i>Bombus crotchii</i>	CDFW: Candidate for Listing under CESA Federal: None	Habitat affinities are unknown; reported from a nearby landscape plant.	May occur , pending formal protocol surveys in 2027
Crowned muilla <i>Muilla coronata</i>	CDFW and Federal: None CNPS: List 4.2	670-1,960 m. Clay, sand, gravel. Chenopod scrub, Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodland. Known from the Southern Sierra Nevada foothills.	Moderate potential to occur, pending focused spring surveys in 2027
Death Valley sandmat <i>Euphorbia vallis-mortae</i>	CDFW and Federal: None CNPS: List 4.2	230-1,460 m. Sandy, gravelly. Mojavean desert scrub. Known to occur in the Southern Sierra Nevada foothills.	Absent from Project area
Desert bird's-beak <i>Cordylanthus eremicus ssp. eremicus</i>	CDFW and Federal: None CNPS: List 4.3	300-2,500 m. Joshua tree woodland, pinyon and juniper woodland. Known to occur in the Southern Sierra Nevada foothills.	Absent from Project area
Gilman's goldenbush <i>Ericameria gilmanii</i>	CDFW: None BLM & USFS: Sensitive CNPS: List 1B.3	2,100-3,400 m. Rocky sites in open coniferous forests, generally on limestone but can be on granite. Subalpine coniferous forest, upper montane coniferous forest. Occurs on east slope of Owens Peak.	Absent from Project area

Table 2. (continued) Summary of special status species reported from the region			
Common and Scientific names	State, Federal, CNPS designations	Habitat Preferences	Likelihood of occurrence
Golden eagle <i>Aquila chrysaetos</i>	CDFW: Watch List, Fully Protected USFWS: Bird of Conservation Concern	Forages over open, undeveloped desert scrub; nests on inaccessible cliff faces.	May fly over, but otherwise absent from Project area
Hall's daisy <i>Erigeron aequifolius</i>	CDFW: None BLM & USFS: Sensitive CNPS: List 1B.3	1,500-2,440 m. On dry rock outcrops in granitic walls and canyons. Broad-leaved upland forest, lower montane coniferous forest, pinyon and juniper woodland, upper montane coniferous forest. Occurs on NE slope of Owens Peak.	Absent from Project area
Inland gilia <i>Gilia interior</i>	CDFW and Federal: None CNPS: List 4.3	700-1,700 m. Rocky. Cismontane woodland, Joshua tree woodland, lower montane coniferous forest. Known to occur in the Southern Sierra Nevada.	Absent from Project area
Inyo onion <i>Allium atrovirens</i> var. <i>crispatum</i>	CDFW and Federal: None CNPS: List 4.3	1,200-2,560 m. Sand or rock substrate. granitic. Joshua tree woodland, Mojave scrub, pinyon and juniper woodland. Known from Owens Peak area.	Absent from Project area
Kern County evening-primrose <i>Camissonia kernensis</i> ssp. <i>kernensis</i>	CDFW and Federal: None CNPS: List 4.3	790 m to 2,130 m. Sandy or gravelly granitic soils. Known to occur on the east slope of the Southern Sierra Nevada (Freeman Canyon and Short Canyon) and the El Paso Mountains (Jepson Flora Project).	Some potential to occur due to the presence of sandy soils
Kit fox <i>Vulpes macrotis</i>	CDFW: Fully Protected Federal: None	Desert scrub habitats.	Present but no active dens on private land; active dens found on Navy lands
Latimer's woodland-gilia <i>Saltugilia latimeri</i>	CDFW: None BLM & USFS: Sensitive CNPS: List 1B.2	400-1,900 m. Rocky or sandy soil on steep slopes, often granitic, sometimes limestone. Chaparral, Mojave desert scrub, pinyon and juniper woodland. In the region, it's known to occur on steep slopes in canyons on east slope of the Sierra Nevada.	Absent from Project area
LeConte's thrasher <i>Toxostoma lecontei</i>	CDFW: Candidate for Listing under CESA USFWS: Bird of Conservation Concern	Forages in desert scrub habitats, nests in silver cholla and larger shrubs like peach thorn.	Absent on private lands Low likelihood of occurrence on Navy lands
Limestone dudleya <i>Dudleya abramsii</i> ssp. <i>calcicola</i>	CDFW and Federal: None CNPS: List 4.3	500-2,600 m. Strictly on carbonate. Chaparral, pinyon and juniper woodland. On carbonate in the Sierra Nevada.	Absent from Project area
Loggerhead shrike <i>Lanius ludovicianus</i>	CDFW: Species of Special Concern USFWS: Bird of Conservation Concern	Forages in desert scrub, nests in larger trees.	Present on Navy lands; likely to forage throughout the Project area but not likely to nest there
Mohave ground squirrel <i>Xerospermophilus mohavensis</i>	CDFW: Threatened USFWS: Petition for federal listing and creation of critical habitat	Resides in desert scrub habitats.	High likelihood of occurrence on both private and Navy lands
Mohave tui chub <i>Siphateles bicolor mohavensis</i>	CDFW: Endangered USFWS: Endangered	Restricted to two seeps (ponds) on China Lake NAWES.	Absent from Project area
Mojave fish-hook cactus <i>Sclerocactus polyancistrus</i>	CDFW and Federal: None CNPS: List 4.2	640-2,320 m. Usually carbonate. Great Basin scrub, Joshua tree woodland, Mojave desert scrub. Known to occur south of Inyokern in the El Paso Mountains.	Absent from Project area

Table 2. (continued) Summary of special status species reported from the region			
Common and Scientific names	State, Federal, CNPS designations	Habitat Preferences	Likelihood of occurrence
Mojave tarplant <i>Deinandra mohavensis</i>	CDFW: Endangered Federal: None CNPS: List 1B3	640-1,600 m. Mesic. Chaparral, coastal scrub, riparian scrub. Known to occur northwest of Project Site in Short Canyon.	Absent from Project area
Monarch butterfly <i>Danaus plexippus</i> Overwintering population	CDFW: Proposed Threatened USFS: Sensitive	various open habitats, including fields, meadows, weedy areas, marshes, and roadsides.	Absent from Project area
Muir's tarplant <i>Carlquistia muirii</i>	CDFW: None BLM & USFS: Sensitive CNPS: List 1B.3	1,185-2,500 m. Crevices of granitic ledges and dry sandy soils. Montane chaparral, lower montane coniferous forest, upper montane coniferous forest. Occurs near summit of Owens Peak.	Absent from Project area
Needle's buckwheat <i>Eriogonum breedlovei</i> var. <i>shevockii</i>	CDFW and Federal: None CNPS: List 4.3	1,615-2,575 m. Granitic rock outcrops; in granitic crevices and ledges on small domes. Pinyon and juniper woodland, Upper montane coniferous forest.	Absent from Project area
Nine Mile Canyon phacelia <i>Phacelia novemmillensis</i>	CDFW and Federal: None CNPS: List 1B.2	1,645-2,640 m. Gravelly (sometimes), sandy (sometimes). Broadleaf upland forest, cismontane woodland, pinyon and juniper woodland, upper montane coniferous forest.	Absent from Project area
Osprey <i>Pandion haliaetus</i>	CDFW: Watch List Federal: None	Nest on trees and elevated platforms next to lakes, ponds, streams, and rivers where they forage.	May fly over, but otherwise absent from Project area
Owen's Peak lomatium <i>Lomatium shevockii</i>	CDFW: None BLM: Sensitive CNPS: List 1B.2	1,770-2,535 m. In colluvial slopes and talus, usually along contact zones of metamorphic and granitic rock. Lower montane coniferous forest, upper montane coniferous forest. Known to occur near summit of Owens Peak.	Absent from Project area
Pale-yellow layia <i>Layia heterotricha</i>	CDFW: None BLM & USFS: Sensitive CNPS: List 1B.1	300-1,705 m. Alkaline or clay. Cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland. Unverified occurrence 3 miles south of Freeman Junction.	Absent from Project area
Pine fritillary <i>Fritillaria pinetorum</i>	CDFW and Federal: None CNPS: List 4.3	1,735-3,300 m. Granitic and metamorphic substrate. Chaparral, lower coniferous forest, pinyon and juniper woodland, subalpine coniferous forest, upper montane coniferous forest. Known to occur near Owens Peak.	Absent from Project area
Prairie falcon <i>Falco mexicanus</i>	CDFW: Watch List USFWS: Bird of Conservation Concern	Forages over desert scrub, nest on inaccessible cliffs	May forage on both private and Navy lands but would not nest on either

Table 2. (continued) Summary of special status species reported from the region			
Common and Scientific names	State, Federal, CNPS designations	Habitat Preferences	Likelihood of occurrence
Rose-flowered larkspur <i>Delphinium purpusii</i>	CDFW: None BLM & USFS: Sensitive CNPS: List 1B.3	300-1,340 m. On shady, rocky slope, often on carbonate. Chaparral, cismontane woodland, pinyon and juniper woodland. Known to occur along Pacific Crest Trail SW of Owens Peak.	Absent from Project area
Sharp-shinned hawk <i>Accipiter striatus</i>	CDFW: Watch List Federal: None	Forages over open scrub and residential neighborhood but, as a winter visitor to the region, would not nest in the area	May forage on both private and Navy lands but would not nest on either
Short-bracted bird's-beak <i>Cordylanthus rigidus</i> ssp. <i>brevibracteatus</i>	CDFW and Federal: None CNPS: List 4.3	610-2,590 m. Openings in habitat on granite. Chaparral, lower montane coniferous forest, pinyon and juniper woodland, upper montane coniferous woodland. Occurs east of Owens Peak summit.	Absent from Project area
Spanish needle onion <i>Allium shevockii</i>	CDFW: None BLM: Sensitive CNPS: List 1B.3	1,200-2,560 m. Sand or rock substrate. granitic. Joshua tree woodland, Mojavean scrub, pinyon and juniper woodland. Known from Owens Peak area.	Absent from Project area
Spotted bat <i>Euderma maculatum</i>	CDFW: Species of Special Concern BLM: Sensitive	Occupies arid deserts and grasslands through mixed conifer forests, feeding over water and along washes, feeding almost entirely on moths, and needing rock crevices in cliffs or caves for roosting.	Absent from Project area
Swainson's hawk <i>Buteo swainsoni</i>	CDFW: Threatened USFWS: Bird of Conservation Concern	Forage over open deserts and particularly agricultural lands, nesting in large trees and occasionally on telephone poles, transmission towers, etc.	May fly over, but otherwise absent from Project area
Sweet-smelling monardella <i>Monardella beneolens</i>	CDFW: None BLM & USFS: Sensitive CNPS: List 1B.3	2,475-3,500 m. Granitic soils. Alpine boulder and rock field, subalpine coniferous forest, upper montane coniferous forest. Occurs near summit of Owens Peak.	Absent from Project area
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	CDFW: Species of Special Concern BLM & USFS: Sensitive	Found in a wide variety of habitats, most common at mesic sites, roosting in the open, hanging from walls and ceilings.	Absent from Project area
Western burrowing owl <i>Athene cunicularia</i>	CDFW: Candidate for Listing under CESA BLM: Sensitive USFWS: Bird of Conservation Concern	Uses existing burrows of other animals in desert scrub habitats.	Observed in the Northern Borrow Pit on private lands and detected on Navy lands
Western Joshua tree <i>Yucca brevifolia</i>	CDFW: Candidate for Listing under CESA Federal: None	May occur individually or in woodland stands.	Absent from Project area
White pygmy-poppy <i>Canbya candida</i>	CDFW and Federal: None CNPS: List 4.2	600-1,460 m. Gravelly, sandy, granitic. Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodland. Known to occur in the Southern Sierra Nevada foothills.	Moderate potential to occur, pending focused spring surveys in 2027
Yellow-eared pocket mouse <i>Perognathus mollipilosus xanthonotus</i>	CDFW: None BLM: Sensitive	Known only from four canyons in the Tehachapi Mountains, in northeastern Kern County, at an elevational range of between 1,220 and 1,615 meters.	Absent from Project area

Table 2. (continued) Summary of special status species reported from the region			
Common and Scientific names	State, Federal, CNPS designations	Habitat Preferences	Likelihood of occurrence
Yuma myotis <i>Myotis yumanensis</i>	CDFW: None BLM: Sensitive	Occurs in open forests and woodlands with sources of water over which to feed, with distributions closely tied to bodies of water, and maternity colonies in caves, mines, buildings, and crevices.	Absent from Project area

3.3. Other Protected Biological Resources.

3.3.1. *Stream Courses.* Stream courses provide relatively important resources to animals and plants. In dry years, and particularly during prolonged drought, annual plants may only germinate in the vicinity of washes where the water table is relatively near the surface. Perennial shrubs adjacent to washes are often the only plants that produce flowers and fruit, which in turn are important to insects and the avian predators that feed on them. Shrubs also tend to be somewhat taller and denser alongside washes, which provides cover for medium and larger sized animals that may use them as travel corridors. Biodiversity is generally enhanced by washes, and there are often both annual and perennial plants that are either restricted to or mostly associated with wash margins. There are both anecdotal accounts and published literature on washes being important to tortoises, which use them as travel corridors and access to nearby annual forage.

Whereas there are no USGS-designated blueline streams or other discernible natural washes in the Project Area, there are five manmade drainage ditches associated with various roads and one drainage ditch on Navy lands associated with a pump station. The following notes correspond to the numbers given in Figure 8, which maps the locations of the six drainages, followed by exhibits in Appendix E. Except for drainage 6 on Navy lands, where photographs were prohibited, three photographs were taken at each site, as per the following example: (8a) 50 meters upstream of the crossing, (8b) at the crossing between Drainage 1 and the right-of-way; and (8c) 50 meters downstream of the crossing. The dominant plant species and drainage widths were recorded at each of the three locations where photographs and widths were taken.

Table 3. Characteristics of six drainages in the Project area					
Drainage number	3 widths (feet)*	Dominant perennial plants			Appendix E photographs
		Centerline**	50 meters up	50 meters down	
1	3, 8, 12	AMDU, AMSA	AMDU, AMSA	AMDU, AMSA	8a, b, c
2	2, 2, 2	AMDU	AMDU, AMSA	AMDU, AMSA, LATR	9a, b, c
3	2, 2, 2	AMDU, AMSA, ERFA	AMDU, AMSA	AMDU, ATPO, LATR	10a, b, c
4	20, 17	AMDU, AMSA, LATR, ATPO, ERNA	AMDU, AMSA, ATPO, ERNA		11a, b
5	3, 4, 3	AMDU, AMSA, ATPO	AMDU, AMSA, LATR, ATCA	AMDU, AMSA, ATPO, LATR	12a, b, c
6	5	ATCA, ERNA			Prohibited

* Drainage widths are given in the following order: At centerline (**bold font**), 50 meters upstream, and 50 meters downstream. So, the impact, if any is at the first width measurement.

** Plant species codes in the third column: AMDU – *Ambrosia dumosa*, AMSA – *Ambrosia salsola*, ATCA – *Atriplex canescens*, ATPO – *Atriplex polycarpa*, ERFA – *Eriogonum fasciculatum*, ERNA – *Ericameria nauseosus*, LATR – *Larrea tridentata*

Drainage 1: The drainage is on the west side of the south-bound ramp exiting Highway 395.

Drainage 2: The drainage runs along the west side of the south-bound lane of Highway 395. Although the widths are given as 2 feet at the centerline and 50 meters either side of the centerline, there are no sandy bottoms along the measured portions of this drainage, so the measurements are referring to rudimentary banks associated with this drainage ditch.

Drainage 3: The drainage runs along the east side of the north-bound ramp entering onto Highway 395.

Drainage 4: The drainage runs along the south side of the east-bound lane of Highway 178. Unlike the other five drainages that continue on beyond the data collection points, this one has distinct beginning and ending points, as shown in Figure 8. This is the reason there are only two widths, two sets of dominant plants, and two photographs tabulated in Table 3. The ditch is approximately 20 feet wide where the right-of-way crosses it.

Drainage 5: The drainage runs along the south side of the east-bound lane of Highway 178.

Drainage 6: Located on Navy lands, this drainage is associated with a pump station where, based on the dense streamside growth, there are regular discharges of water, which at first run along a ditch perhaps created by the discharge but eventually run onto a diagonal road running to the northwest, which is visible in the lower image of Figure 4a. There is no centerline associated with this ditch, so the one measurement given is where the first peripheral transect crossed the ditch.

It is CMBC's observation that these are all manmade drainage ditches, that none of them constitutes jurisdictional waters, and none would divert or obstruct the natural flow of water to or from any river, stream, or lake.

The biological resources that may be impacted as the result of connections to municipal water, stormwater, and sewer services are expected to be the same as those affected by other RBIDC facilities depending on locations. Transects spaced at 10-meter intervals out to 50 meters and 30-meter intervals out to 500 meters were designed to assess biological resources in all areas either directly or indirectly impacted, respectively, by construction, operation, and maintenance including potential jurisdictional waters.

3.3.2. *Protected Plant Species.* At the State level, the 1998 Food and Agricultural Code, Division 23: California Desert Native Plants Act, Chapter 3: Regulated Native Plants, Section 80073 states: The following native plants, or any parts thereof, may not be harvested except under a permit issued by the commissioner or the sheriff of the county in which the native plants are growing (those that occur onsite are highlighted in red):

- (a) All species of the family Agavaceae (century plants, nolinās, yuccas).
- (b) All species of the family **Cactaceae** (cacti), except for the plants listed in subdivisions (b) and (c) of Section 80072 (i.e., saguaro and barrel cacti), which may be harvested under a permit obtained pursuant to that section.
- (c) All species of the family Fouquieriaceae (ocotillo, candlewood).
- (d) All species of the genus *Prosopis* (**mesquites**).
- (e) All species of the genus *Cercidium* (palo verdes).
- (f) *Senegalia (Acacia) greggii* (catclaw acacia).
- (g) *Atriplex hymenelytra* (desert holly).
- (h) *Dalea (Psoralea) spinosa* (smoke tree).
- (i) *Olneya tesota* (desert ironwood), including both dead and live desert ironwood.

CMBC observed 44 silver cholla plants and one honey mesquite plant on private lands within 50 meters of the proposed Data Center and linear facilities and six cholla plants on Navy lands, some of which may be directly impacted if salvage and transplanting are not implemented.

4.0. Conclusions and Recommendations

4.1. Impacts to Agassiz's Desert Tortoise and Proposed Mitigation. Based on the absence of tortoise sign on private lands, outside China Lake NAWS, and available information reviewed for this habitat assessment, CMBC concludes that tortoises are absent from the private portions of the Project area. However, there is an abundance of both fresh and older sign of both adult and subadult tortoises in and adjacent to the Project area on the base. CMBC suspects that the Navy's perimeter fence, which precludes many of the human uses that apparently extirpated tortoises from private lands (e.g., cross country vehicle travel, loss of habitat to residential and commercial development, dumping, collecting tortoises as pets, etc.), has protected habitats sufficiently that tortoises are persisting on Navy lands.

Although most of the tortoise sign is in adjacent areas, one adult scat was found within the Project impact area and two were found within the 50-meter survey buffer area. Additionally, Bailey, who helped perform the July and September 2026 surveys, reported that an adult tortoise that had crawled beneath the Navy's perimeter fence into the Project area several years ago was subsequently relocated back onto the base by USFWS personnel.

Since the Project cannot be developed without impacting these tortoise-occupied habitats, it is necessary that incidental take permits for desert tortoise be acquired from both CDFW under Section 2081 of the Fish and Game Code and from the USFWS under Section 10(a)(1)(B) of the Federal Endangered Species Act. Since both of these permits will identify agency-approved protective measures to allow development while minimizing and avoiding impacts to tortoises, CMBC does not identify analogous measures in this report, which may conflict with or differ from those required by the CDFW and USFWS.

Note that it is current management for protective measures to be identified and implemented for the entire Project, not just those portions occupied by tortoises. So, the protective measures identified by the agencies would likely be applied throughout the private lands and not be limited to Navy lands only. The agencies (e.g., likely CDFW) will determine the impact acreage to be compensated and to set the compensation ratio for the Project.

4.2. Impacts to Other Biological Resources and Proposed Mitigation.

4.2.1. *Stream Courses.* It is CMBC's professional opinion that none of the six drainages assessed in this report constitutes jurisdictional waters, and that none of them will divert or obstruct the natural flow of any river, stream or lake. If CDFW determines that the proposed Project may substantially adversely affect fish and wildlife resources, a Streambed Alteration Agreement would need to be prepared. The Agreement includes reasonable conditions necessary to protect those resources and must comply with CEQA. The Proponent may proceed with the activity in accordance with the final Agreement. The form is available at <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

4.2.2. *Other Special Status Species.* Based on the field survey and habitat assessment, CMBC concludes that none of the following 35 special status species (listed in alphabetical order) reported from the region will likely be adversely affected by site development: Barstow woolly sunflower, beautiful threadplant, Big Springs legless lizard, Charlotte's phacelia, Death Valley sandmat, desert bird's-beak, Gilman's goldenbush, golden eagle, Hall's daisy, inland gilia, Inyo onion, Latimer's woodland gilia, LeConte's thrasher, limestone dudleya, Mohave tui chub, Mojave fish-hook cactus, Mojave tarplant, monarch butterfly, Muir's tarplant, Needles buckwheat, Nine Mile Canyon phacelia, osprey, Owen's Peak lomatium, pale-yellow layia, pine fritillary, rose-flowered larkspur, short-bracted bird's-beak, Spanish needle onion, spotted bat, Swainson's hawk, sweet-smelling monardella, Townsend's big-eared bat, western Joshua tree, yellow-eared pocket mouse, and Yuma myotis. As such, no mitigation measures are recommended.

Those species either identified during the current survey, for which suitable habitats may be present, and/or CMBC and EREMICO cannot conclude that they are absent, include crowned muilla, Kern County evening-primrose, white pygmy poppy, Mohave ground squirrel, Crotch's bumble bee, western burrowing owl, loggerhead shrike, prairie falcon, sharp-shinned hawk, American badger, and kit fox.

For **rare plant species**, if there is sufficient winter rainfall in 2026, CMBC recommends that EREMICO (or other qualified botanist) be enlisted to perform spring surveys in all proposed impact areas to conclusively determine the presence or absence of crowned muilla, Kern County evening-primrose, white pygmy poppy (and any other rare plant species), which are the rare annual plant species that would not have been detected in July or September during EREMICO's summer and fall plant surveys. Under this scenario, a single survey in April 2027 would likely be enough to determine presence or absence. If there is sufficient rainfall between about October 2026 and March 2027, annual plant germination is likely and surveys in April 2027 would be conclusive. Only Mojave tarplant is listed as Endangered and has been determined to be absent, and although rare, none of these other species is listed, which minimizes the significance of impacts, if any.

Importantly, these surveys are not recommended as mitigation or in lieu of implementing protective measures. Rather, since both State and federal ITPs will be required for Project development and it will likely take many months (e.g., well after spring 2027), the surveys are recommended to augment current findings so the regulatory agencies have the best available data on which to base their impacts analysis and associated mitigation in the ITPs.

Due to the lack of suitable nesting substrates, no additional surveys are recommended for **loggerhead shrike**. The nesting bird surveys recommended below in Section 4.2.2.c. will be sufficient to confirm (if applicable) that there are no nesting shrikes in development areas. Similarly, although **prairie falcons** and **sharp-shinned hawks** could potentially forage onsite, Project development is not considered to be a significant impact to the species loss of marginal foraging habitat, nor would either likely be encountered on a spot check inventory.

CDFW (2023b) survey guidelines for **Crotch's bumble bee** require, among other things, that “Survey efforts should include multiple on-site surveys and should be developed to detect foraging bumble bees and potential nesting sites (nesting surveys). To increase probability of detection, bumble bee survey efforts should be conducted during the Colony Active Period (Table 1) [in CDFW 2023b] and when floral resources are present, ideally during peak bloom. For very large project sites, for example, surveyors should use large meandering transects that incorporate patches of floral resources across the landscape. It is recommended that at least 3 on-site surveys take place prior to Project implementation. Each survey should ideally be spaced 2-4 weeks apart during the Colony Active Period (April to August) to ensure that they cover a range of dates and account for variability in resource use by the Candidate Species and floral resource phenology within the site. Surveys should occur during the day (at least an hour after sunrise and at least two hours before sunset, though ideally between 9 am-1 pm) on warm, but not hot, sunny days (65-90 °F), with low wind (less than 8 mph). Focused surveys should be conducted for a minimum of one person-hour of searching per three acres of suitable habitat,” which for a 50-acre site, would be 17 hours and therefore occur on two consecutive days.

To date, these surveys have not been performed. The conundrum is that surveys should be performed during peak blooms between April and August (the Colony Active Period), which, in the Mojave Desert, limits surveys to about one month, in April, and only after sufficient winter rainfall in the previous year. As such, there should be three visits between two and four weeks apart, but if the survey window is restricted to the month of April and only if there are sufficient blooms, it is difficult if not impossible to meet all the survey requirements. CMBC can facilitate surveys next April 2027 if the site is not yet developed.

For **western burrowing owl**, whereas only older burrowing owl sign was found in four locations in July 2026 and there are both suitable burrow and perch sites available both inside and outside China Lake NAWS, an owl was flushed from the Northern Borrow Pit on September 2, 2026 and definitive fresh sign (e.g., a fresh pellet and feather) were found on the base. So at the time of this writing, there is evidence of burrowing owl presence on both private and Navy lands.

According to CDFG (2012), “Occupancy of burrowing owl habitat is confirmed at a site when at least one burrowing owl, or its sign at or near a burrow entrance, is observed *within the last three years* (Rich 1984)” [*emphasis added*]. CMBC confirmed on September 2, 2026 that at least one burrowing owl is still present in the Northern Borrow Pit on private lands. CMBC recommends that both nonbreeding and breeding burrowing owl surveys be performed later in 2026 and in the spring of 2027 to determine the status of overwintering and resident burrowing owls, respectively.

If the Project is not developed by mid-April 2027, which is likely given the time needed for CDFW and USFWS to process incidental take permits, CMBC recommends that breeding bird surveys be performed as per CDFG (2012) protocol, which entails three or more surveys, at least three weeks apart, between April 15 and July 15. The detailed information given in Figure 3b and Table 2 are intended to allow biologists to revisit these specific resources to see if any new burrowing owl signs have accumulated since the July and September 2026 surveys. To be proactive, CMBC suggests that the burrowing owl resources identified herein on private lands be visited several times in the fall and winter of 2026, as per CDFG (2012) recommendations, noting, “Non-breeding season (1 September to 31 January) surveys may provide information on burrowing owl occupancy, but do not substitute for breeding season surveys because results are typically inconclusive.” Given the absence of burrows on China Lake NAWS, CMBC does not expect that additional surveys will need to be performed on base, pending CDFW input.

CDFG (2012) has stipulated that the following should be considered impacts to the species, keeping in mind that as a Candidate Species for Listing under CESA, the species must be treated as if it is listed until which time the Fish and Game Commission publishes a final determination:

- Disturbance within 50 meters (approximately 160 feet), which may result in harassment of owls at occupied burrows;
- Destruction of natural or artificial burrows (i.e., culverts, concrete slabs, and debris piles that provide shelter to burrowing owls); and
- Destruction and/or degradation of foraging habitat adjacent [within 100 meters (approximately 320 feet)] of an occupied burrow(s).

If impacts cannot be avoided, specified mitigation measures include (a) avoiding occupied burrows during the breeding season, between February 1 and August 31; (b) purchasing and permanently protecting 6.5 acres of foraging habitat per pair or unpaired resident birds impacted; (c) creating new burrows or enhancing others when destruction of occupied burrows is unavoidable; (d) implementing passive relocation if owls must be moved; and (e) provide funding for long-term management and monitoring of protected lands.

Given this information, CMBC reiterates that it is highly advisable (and cost effective) to avoid impacts. CDFG (2012) states the following:

If avoidance is the preferred method of dealing with potential Project impacts, then no disturbance should occur within 50 meters (approximately 160 feet) of occupied burrows during the nonbreeding season of September 1 through January 31 or within 75 meters (approximately 250 feet) during the breeding season of February 1 through August 31. Avoidance also requires that a minimum of 6.5 acres of foraging habitat be permanently preserved contiguous with occupied burrow sites for each pair of breeding burrowing owls (with or without dependent young) or single unpaired resident bird. The configuration of the protected habitat should be approved by the Department [CDFW].

Concerning **kit foxes**, in a February 7, 2017 email from CDFW biologist, Becky Jones, she said “CDFW’s interpretation is that trapping or handling of kit foxes is not allowed due to the regulations cited above [in Section 3.2.2]. Passive relocation is currently the only strategy for excluding desert kit fox from Project sites, provided the fox is not in a natal den. Activity at burrow sites can be evaluated using motion-activated cameras, which are less labor intensive. It can also be evaluated by checking for tracks using diatomaceous earth at den openings or just smoothing the sand at the openings. Project applicants will need to have a specific plan for addressing desert kit fox passive relocation, with adequate scheduling built into it. Passive relocation should not take place while young are still in dens and dependent on the parents for food, or while females may be pregnant (either could directly cause death of pups). This most likely rules out passive relocation between mid-January through June or July, or until biologists can document that pups are independent enough to travel with the parents off-site. This is why it is imperative to know in advance how many desert kit fox burrows are within the Project footprint, how many are active and inactive, and what the construction schedule is for the Project, so adequate time is allowed for passive relocation planning and implementation.”

At the time of this writing (e.g., September 2026), three active kit fox dens were found on China Lake NAWS, including one within the Project impact area. If active dens are found here or elsewhere within the Project impact areas, measures similar to those above with input from pertinent CDFW biologists, must be implemented to avoid impacts. Since burrowing owls are most likely to use kit fox dens in the Project area, there will be opportunities in the fall/winter of 2026 and springtime of 2027 to inspect inactive kit fox dens for any new activity.

For **Mohave ground squirrel**, based on the information given herein and the intactness of habitat within the current proposed Project area, the Proponent has opted to assume presence rather than perform costly trapping surveys and mitigate accordingly, which will be specified in the Section 2081 ITP to be acquired from CDFW.

RLC proposes to mitigate impacts by acquiring an ITP and conveying a conservation easement to the DTPC to conserve, in perpetuity, 90.27 acres of habitat located in Inyokern, CA (the “RBIDC Easement Area”). The proposed RBIDC Easement Area is a part of a complex of conservation lands consisting of a total of 430.29 acres designated as follows:

- The RB Solar Project Easement Area consisting of a total of 340.02 acres located in the Inyokern area, an unincorporated community of the County of Kern, California referred to herein as **Parcel A** (APN 341-010-11, consisting of 219.34 acres +/- of a 321.10-acre parcel) and **Parcel B** (APN 341-151-10, consisting of 120.68 acres); and
- The RBIDC Easement Area consisting of 90.27 acres located on the northern part of Parcel A.

CMBC has conducted extensive surveys of the above mitigation lands including the most recent one, a reconnaissance in 2025 (CMBC 2025). Importantly, on January 23, 2023, CDFW Region 4 issued a Biological Suitability Letter (CDFW 2023c) stating that these parcels were acceptable as Habitat Management Lands offsetting the take of desert tortoise and Mohave ground squirrel associated with the RB Inyokern Solar Project (CDFW 2022).

The combined acreage of the parcels comprising both the RB Inyokern Conservation Area and the proposed RBIDC Conservation Area is 430.29 acres. Given that 340.02 acres of mitigation credits were used for development of the RB Inyokern Solar Project in 2023, 90.27 acres remain as mitigation credits to offset impacts associated with the RBIDC Project. At the time of this writing, CMBC does not know the compensation ratio CDFW will require in its Section 2081 ITP for the Project.

Given RLC's decision to mitigate impacts in an ITP, it is important that an accurate estimate of the acreage of impacts be determined, including both temporary and permanent habitat losses. SCE-constructed interconnection facilities are included within the scope of this analysis. As stated in MOS174 (TN 269642), construction of the SCE electric facilities is assumed to undergo environmental review pursuant to CEQA as part of the larger Project.

The following acreages reflect the current conceptual design stage and will be refined upon completion of SCE's final engineering under MOS174, consistent with Sections 1.5 and 2.1 of the SPPE Application.

Potential impacts are classified as temporary or permanent. Temporary impacts comprise construction activities, including the use of vehicles, storage of construction materials and equipment, short-term ground disturbance such as staging areas, stockpiles, and manholes, and restorable linear excavation such as conduit trenching and conductor pulling and tensioning sites where topography is restored and revegetated. While the duration of the disturbance action would be temporary, the impacts to vegetation would be long term, at least in areas with desert vegetation. For restoration of native perennial vegetation in the Mojave Desert, Abella (2010) reported recovery of vegetation lost from surface disturbance would take 200 years. Construction and installation of new facilities are examples of permanent impacts where habitats will be lost for the foreseeable future.

Project-related ground disturbance totals are estimated to be 79 acres (78.96), comprising approximately 44 acres (44.04) of permanent habitat loss and approximately 35 acres (34.92) of temporary construction disturbance. The temporary construction disturbance occurs entirely within work areas associated with the SCE-constructed interconnection facilities.

Permanent habitat loss consists of the following:

- On-site development footprint: estimated to be 38.18 acres. As described in Section 1.2.2 of the SPPE Application (TN 269893), this footprint encompasses the data center campus, the customer-owned substation, and on-site electrical infrastructure within the 50-acre± Project Site. This area would be permanently converted.

- Off-site SCE-constructed interconnection facilities: estimated to be 5.86 acres. This consists of structure foundations and the permanently cleared radius maintained at each structure, the expansion of the existing Inyokern 115 kV Substation (approximate footprint 136 by 101 feet), and new access and spur roads.

The estimated 34.92 acres of temporary construction disturbance consists of SCE structure installation work areas, conductor pulling and tensioning sites, fiber optic conduit and manhole installation, and construction use of existing dirt service roads. These areas would be disturbed during construction of the SCE facilities but would not be permanently occupied by Project facilities. Final temporary work area acreage will be quantified by SCE upon completion of its final engineering under MOS174 and submitted as a supplement to the SPPE Application, consistent with Section 1.2.2.

Structure quantities are taken from MOS174 (TN 269642) and comprise 10 tubular steel poles and 48 lightweight steel structures across Routes 1 and 2, all assumed to be new construction. Per-structure work areas and the definition of permanent disturbance follow SCE's filed disturbance methodology for comparable 115 kV subtransmission construction, under which permanent disturbance comprises the structure foundation and the vegetation clearance maintained around it, and the surrounding construction work area is temporary. Approximately 74% of the combined route length follows existing dirt service roads already in active use; no vegetation removal or road widening is anticipated along those segments, and construction use of them is classified as temporary. New access and spur roads are treated as permanent. No deduction has been taken for overlapping work areas; the acreages stated above are therefore conservative.

4.2.2.a. Protected Plants. As reported herein, 44 silver cholla plants and 1 honey mesquite plant are those species protected by the California Desert Native Plants Act that were observed on private lands during surveys. An additional six silver cholla plants were observed within and adjacent to impact areas on Navy lands. Most of the individual plants would not be affected by the proposed Project. Those that may be affected can be salvaged and transplanted into adjacent areas owned by the Proponent and monitored for a reasonable period of time until it is determined they are established.

4.2.2.b. Bird Nests. Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (As listed under the Migratory Bird Treaty Act). Typically, CDFW requires that vegetation not be removed from a project site between March 15 and September 15 to avoid impacts to nesting birds. If it is necessary to commence Project construction between March 15 and September 15, a qualified biologist should survey all shrubs and structures within the Project Site for nesting birds, prior to Project activities (including construction and/or site preparation).

Surveys should be conducted at the appropriate time of day during the breeding season, and surveys would end no more than three days prior to clearing. CDFW is typically notified in writing prior to the start of the surveys. Documentation of surveys and findings should be submitted to the CDFW within ten days of the last survey. If no nesting birds are observed, Project activities may begin. If an active bird nest is located, the plant in which it occurs should be left in place until the birds leave the nest. No construction is allowed near active bird nests of threatened or endangered species.

4.2.3. *Miscellaneous CEC Concerns.* In the CEC Memo of June 11, 2026, the following issues were identified with regard to QK's (2025a) BAR, which are addressed below.

DR BIO-7.1. Analyze and disclose the use of herbicide, pesticide, and rodenticide during each phase of the project and any potential impacts to sensitive biological resources.

The Project does not propose agricultural operations or broadcast chemical application. Site landscaping consists of xeriscape, drought-tolerant native plantings consistent with the California Model Water Efficient Landscape Ordinance, minimizing the need for chemical vegetation management. Specific herbicide, pesticide, or rodenticide use has not been defined, as the associated operational programs are established at final engineering. Any regulated materials used or stored on site would be addressed through the Project's applicable materials management programs, and any application would be limited, target-specific, and performed in accordance with product labeling and applicable regulations.

DR BIO-7.2. Describe potential impacts to birds during the operation phase of the project from solar panels, including potential for "lake effect" impacts and collision and electrocution risks from overhead electrical infrastructure.

The Project includes approximately 1 MW of photovoltaic (PV) systems installed on the rooftop of the data center and as parking canopies within the developed campus footprint as an ancillary energy efficiency feature, as described in the application (Section 1.4.8). The PV facilities are not proposed as a utility-scale generation facility and would not export electricity to the grid. Overhead electrical infrastructure associated with the Project consists of the two SCE-constructed 115 kV overhead subtransmission lines and associated SCE electrical infrastructure, the design of which is subject to SCE's final engineering.

It is CMBC's understanding that the lake effect pertains to large solar fields often covering hundreds or thousands of acres. Birds misidentify these solar arrays as bodies of water that they crash into when they try to land on them. There is no evidence that this effect applies to rooftop or canopy-top solar panels as are planned for the Data Center. Given the commercial and residential development in adjacent areas, which are supported by numerous existing transmission and distribution lines, the addition of Project-related facilities is similar to what already exists in the area and is not considered to be a significant addition with increased adverse impacts.

DR BIO-7.3. Describe any potential impacts to sensitive biological resources from the use of groundwater in the Indian Wells Groundwater Basin boundary, including water supplied by the Inyokern CSD and the proposed emergency backup well for the data center facility.

The Project's water supply would be provided by the CSD, which issued an executed Will Serve Letter dated April 2, 2026 committing to serve the Project's water and sanitary sewer demand and confirming sufficient supplies within the District's planning horizon. Operational water demand is estimated at 36.83 to 49.10 acre-feet per year (Application

Section 4.10 and Appendix E, Water Supply Assessment, TN 269636), within a CSD service envelope of approximately 40,430 gallons per day average day demand, 60,645 gallons per day maximum day demand, and 101,075 gallons per day peak hour demand. Construction water demand is estimated at 9 to 11 million gallons total, with the 8-month earthwork phase at approximately 3 to 3.5 million gallons.

The Project is served through the District's system as an existing basin water supplier rather than by new independent groundwater production, and does not propose to extract groundwater outside of the District's allocations. The Project is committed under Mitigation Measures MM 4.10-2 (GSP Compliance) and MM 4.10-3 (Water Source Verification) to comply with applicable Indian Wells Valley Groundwater Authority (IWVGA) Groundwater Sustainability Plan restrictions, including annual pumping allocations and augmentation fees. These are enforceable conditions of the Project.

The proposed on-site well is characterized as an emergency backup or supplemental source of water for the Project, not the Project's primary operational water supply (Cornerstone Engineering technical memorandum, TN 271675). The well would be sized to supply approximately 45 to 50 gallons per minute sustained over a three-day period, sufficient to meet maximum day demand during a service interruption. No wells currently exists on the property, and the proposed well has not been drilled or tested. Use of the well would be subject to Kern County well permitting requirements, IWVGA Groundwater Sustainability Plan implementation requirements, pumping verification and reporting, and applicable basin fee, allocation, and adjudication requirements.

Special status plants and animals reported in the region are mostly associated with upland areas. Except for Mohave tui chub, which occurs at Lark Seep approximately 9.6 miles east-northeast and spotted bat and Yuma myotis, which forage over open bodies of water, none of the special status species reported from the region would be directly affected by the use of groundwater associated with this Project.

DR BIO-8. Please provide an analysis of potential impacts to sensitive biological resources from a BESS [Battery Energy Storage System] fire resulting from thermal runaway as a worst-case scenario if lithium iron phosphate technology were to be chosen for the design. The analysis shall include an assessment of potential impacts from smoke and chemical deposition to sensitive plants and wildlife.

RBIDC has adopted lithium iron phosphate (LFP) as the design-basis chemistry for the worst-case thermal-runaway analysis, with the deposition piece to be covered in D.1 Rev 2. This is consistent with how the application treats the BESS in Section 4.6.5.6. Appendix A Supplement — Section A.4⁶ is provided by RLC in the Project application to provide the requested information. RLC is responsible to produce a Fire Management Plan that will address emergency responses to fires associated with the proposed Project. No evidence of desert tortoise has been found, all evidence found thus far of western burrowing owl and kit fox is older suggesting that neither is resident in the Project area, so only Mohave

⁶ <https://www.dropbox.com/scl/fi/yaub35vpsl8bcqbh7txp1/Appendix-A-Supplement-Section-A.4.pdf?rlkey=fi8uto6mkewi3uusi9wef&dl=0>

ground squirrel may occur and be potentially affected by a BESS-related fire. As envisioned, the ITP will require that Mohave ground squirrels are removed from the Project area prior to ground disturbance, and the likelihood of immigration from adjacent areas is minimized by existing development. Given these factors, CMBC does not expect that Mohave ground squirrel will be adversely affected in excess of that which is authorized by CDFW.

DR BIO-11. Please describe how areas within the survey buffer that are physically inaccessible would be assessed for presence of burrows and dens that could support these species.

CDFG (2012), in particular, recommends that peripheral transects out to 150 meters be surveyed without regard to land ownership. CEC recommended that peripheral transects be performed out to 150 meters to detect desert kit fox dens and out to 500 meters to detect evidence of burrowing owl. Except for the fenced Installation at the China Lake NAWS and areas of existing development that are both fenced and unfenced, CMBC did not encounter any no trespassing signs that precluded surveys in buffer areas. Unless CEC requires that landowner permission be acquired ahead of time, CMBC expects that future surveys in buffer areas (e.g., breeding and nonbreeding burrowing owl surveys) may proceed much as they did during the July 2026 presence-absence surveys.

4.3. Application for incidental take permits for the Project.

RLC intends to apply for a Section 2081 ITP from CDFW for impacts to Mohave ground squirrel, desert tortoise, western burrowing owl, LeConte's thrasher, and Crotch's bumble bee. Inclusion of these species would ensure that CDFW incidental take authorization would be in place to cover the possibility that any of these species is found onsite at the time of development. Given that the owl, thrasher, and bumble bee are CDFW Candidate Species for Listing under CESA, the species may either be formally listed or dropped as candidate species, which would not affect the intended function of the ITP. If they are not included as Covered Species but later discovered onsite, the ITP would need to be amended, which is both costly and time consuming.

Since tortoise sign has been found in and adjacent to impact areas on Navy lands, a federal 10(a)(1)(B) ITP would need to be acquired and applied to the entire Project, on both private and federal lands. Since there is currently a petition to federally list the Mohave ground squirrel, it is prudent to include it as a Covered Species in the Section 10(a)(1)(B) ITP in case it is subsequently listed before project construction.

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Appendix A. Plant Species Detected

The following plant species were identified onsite and in adjacent areas during the focused floral inventories conducted by CMBC in July and September 2026. **Protected plant species are highlighted in red and signified by “(PPS)” following the common names.**

ANGIOSPERMAE: DICOTYLEDONES

Asteraceae

Acamptopappus sphaerocephalus
Ambrosia acanthicarpa
Ambrosia dumosa
Ambrosia salsola
Chaenactis fremontii
Encelia actoni
Ericameria cooperi var. *cooperi*
Ericameria (Chrysothamnus) nauseosus
Erigeron (Conyza) canadensis
**Lactuca serriola*
Lasthenia californica
Leptosyne (Coreopsis) sp.
Matricaria (Camomilla) suaveolens
Pseudognaphalium (Gnaphalium) sp.
Stephanomeria exigua
Stephanomeria pauciflora

Boraginaceae

Amsinckia tessellata
Cryptantha dumetorum
Eremocarya (Cryptantha) c.f. micrantha
Johnstonella (Cryptantha) angustifolia

Brassicaceae

**Brassica tournefortii*
Caulanthus lasiophyllus (Guillenia lasiophylla)
Descurainia pinnata
**Descurainia sophia*
Lepidium flavum
**Sisymbrium altissimum*
**Sisymbrium irio*

Cactaceae

Cylindropuntia echinocarpa

DICOT FLOWERING PLANTS

Sunflower family

Desert goldenhead
 Annual bur-sage
 Burrobush
 Cheesebush
 Desert pincushion
 Acton encelia
 Cooper's goldenbush
 Rubber rabbitbrush
 Mare's tail
 Wild lettuce
 California goldfields
 Coreopsis
 Pineapple weed
 Everlasting
 Milk aster
 Desert milk aster

Borage family

Fiddleneck
 Forget-me-not
 Mountain red root
 Narrow-leaved forget-me-not

Mustard family

Saharan mustard
 California mustard
 Tansy
 Flixweed
 Peppergrass
 Tumble mustard
 London rocket

Cactus family

Silver cholla (PPS)

Chenopodiaceae*Atriplex canescens**Atriplex polycarpa**Grayia spinosa***Salsola tragus***Cucurbitaceae***Cucurbita palmata***Ehretiaceae***Tiquilia plicata***Euphorbiaceae***Croton (Eremocarpus) setiger**Euphorbia albomarginata**Euphorbia polycarpa**Stillingia paucidentata***Fabaceae***Astragalus lentiginosus**Parkinsonia aculeata**Neltuma odorata (Prosopis glandulosa)***Geraneaceae****Erodium cicutarium***Hydrophyllaceae***Phacelia fremontii***Lamiaceae***Salvia carduacea***Lennoaceae***Pholisma arenarium***Loasaceae***Petalonyx thurberi***Onagraceae***Chylismia (Camissonia) brevipes**Chylismia (Camissonia) claviformis**Eremothera (Camissonia) boothii**Oenothera sp.***Goosefoot family**

Four-winged saltbush

Allscale

Spiny hopsage

Russian thistle

Gourd family

Coyote gourd

Ehretia family

Plicate coldenia

Spurge family

Doveweed

Rattlesnake weed

Sandmat

Stillingia

Pea family

Milk-vetch

Mexican palo verde

*Honey mesquite (PPS)***Geranium family**

Red-stemmed filaree

Water-leaf family

Yellow-throats

Mint family

Thistle sage

Sand food family

Sand food

Stick-leaf family

Sandpaper plant

Evening-primrose family

Yellow cups

Brown-eyed primrose

Red primrose

Oenothera

Polemoniaceae

Eriastrum c.f. *eremicum*
Eriastrum c.f. *sapphirinum*
Gilia sp.
Loeseliastrum matthewsii

Polygonaceae

Chorizanthe brevicornu
Eriogonum fasciculatum
Eriogonum gracillimum
Eriogonum pusillum

Solanaceae

Datura wrightii
Lycium andersonii
Lycium cooperi

Tamaricaceae

**Tamarix aphylla*

Zygophyllaceae

Larrea tridentata

ANGIOSPERMAE: MONOCOTYLEDONES

Poaceae

**Bromus diandrus*
 **Bromus rubens*
 **Bromus tectorum*
 **Bromus (trinitii) berterioanus*
 **Cynodon dactylon*
 **Hordeum murinum*
 **Polypogon monspeliensis*
 **Schismus* sp.
Stipa (Achnatherum) hymenoides
 **Triticum aestivum*

Typhaceae

Typha latifolia

Phlox family

Woolly star
 Woolly star
Gilia
 Sunbonnets

Buckwheat family

Brittle spineflower
 California buckwheat
 Buckwheat
 Buckwheat

Nightshade family

Jimsonweed
 Anderson's box-thorn
 Peach thorn

Tamarisk family

Athel

Caltrop family

Creosote bush

MONOCOT FLOWERING PLANTS

Grass family

Common ripgut-grass
 Red brome
 Cheat grass
 Chilean grass
 Bermuda grass
 Hare barley
 Rabbitfoot grass
 Split-grass
 Sand rice grass
 Wheat

Cat-tail family

Cat-tail

* - indicates a non-native (introduced) species.

c.f. - compares favorably to a given species when the actual species is unknown.

Some species may not have been detected because of the seasonal nature of their occurrence. Common names are taken from Beauchamp (1986), Hickman (1993), Jaeger (1969), and Munz (1974).

Appendix A. Plant Species Detected (continued)

The following plant species were identified within the Project area during the focused floral inventories conducted by EREMICO in July and September 2026. **Protected plant species are highlighted in red and signified by “(X²)” following the scientific name.**

FAMILY / SCIENTIFIC NAME	COMMON NAME	HABIT
EUDICOT FLOWERING PLANTS		
ASTERACEAE	SUNFLOWER FAMILY	
<i>Acamptopappus sphaerocephalus</i> var. <i>hirtellus</i>	goldenhead	shrub
<i>Ambrosia acanthicarpa</i>	annual bur-sage	annual herb
<i>Ambrosia dumosa</i>	burro bush	shrub
<i>Ambrosia salsola</i>	cheesebush	shrub
<i>Chaenactis fremontii</i>	Fremont pincushion	annual herb
<i>Encelia actoni</i>	Acton encelia	shrub
<i>Ericameria cooperi</i> var. <i>cooperi</i>	Cooper’s goldenbush	shrub
<i>Ericameria nauseosa</i>	rubber rabbitbrush	shrub
<i>Erigeron canadensis</i>	horseweed	annual herb
<i>Lasthenia gracilis</i>	common goldfields	annual herb
<i>Malacothrix glabrata</i>	desert dandelion	annual herb
<i>Matricaria discoidea</i>	pineapple weed	annual herb
<i>Sonchus oleraceus</i> ¹	common sow thistle	annual herb
<i>Stephanomeria exigua</i>	annual mitra	annual herb
<i>Stephanomeria pauciflora</i>	wire-lettuce	perennial herb/subshrub
<i>Stylocline</i> sp.	neststraw	annual herb
BORAGINACEAE	BORAGE FAMILY	
<i>Amsinckia tessellata</i> var. <i>tessellata</i>	desert fiddleneck	annual herb
<i>Cryptantha dumetorum</i>	scrambling cryptantha	annual herb
<i>Cryptantha nevadensis</i>	Nevada cryptantha	annual herb
<i>Eremocarya micrantha</i> var. <i>micrantha</i>	desert red-root	annual herb
<i>Johnstonella angustifolia</i>	narrow-leaved johnstonella	annual herb
<i>Pectocarya linearis</i> ssp. <i>ferocula</i>	narrow-toothed pectocarya	annual herb
<i>Plagiobothrys arizonicus</i>	Arizona popcornflower	annual herb
<i>Streptanthella longirostris</i>	streptanthella	annual herb
BRASSICACEAE	MUSTARD FAMILY	
<i>Brassica tournefortii</i> ¹	Sahara mustard	annual herb
<i>Caulanthus lasiophyllus</i>	California mustard	annual herb
<i>Lepidium lasiocarpum</i> ssp. <i>lasiocarpum</i>	modest peppergrass	annual herb
<i>Sisymbrium altissimum</i> ¹	tumble mustard	annual herb
<i>Sisymbrium orientale</i> ¹	oriental hedge mustard	annual herb
CACTACEAE	CACTUS FAMILY	
<i>Cylindropuntia echinocarpa</i> ²	silver cholla	perennial stem succulent
CHENOPODIACEAE	GOOSEFOOT FAMILY	
<i>Atriplex canescens</i> var. <i>canescens</i>	four-wing saltbush	shrub
<i>Atriplex polycarpa</i>	allscale	shrub
<i>Grayia spinosa</i>	spiny hope-sage	shrub
<i>Salsola tragus</i> ¹	Russian-thistle	annual herb
CONVOLVULACEAE	MORNING-GLORY FAMILY	
<i>Cuscuta denticulata</i>	small-tooth dodder	annual or perennial, holoparasitic herb
EHRETIACEAE	EHRETIA FAMILY	
<i>Tiquilia plicata</i>	fan-leaved tiquilia	perennial herb
EUPHORBIACEAE	SPURGE FAMILY	

FAMILY / SCIENTIFIC NAME	COMMON NAME	HABIT
<i>Croton setiger</i>	doveweed, turkey-mullein	annual herb
<i>Euphorbia micromera</i>	Sonoran sandmat	annual herb
<i>Stillingia paucidentata</i>	Mojave stillingia	perennial herb
FABACEAE	LEGUME FAMILY	
<i>Astragalus lentiginosus</i>	freckled milkvetch	perennial herb
<i>Lupinus microcarpus</i> var. <i>horizontalis</i>	sunset lupine	annual herb
GERANIACEAE	GERANIUM FAMILY	
<i>Erodium cicutarium</i> ¹	red-stemmed filaree	annual herb
HYDROPHYLLACEAE	WATERLEAF FAMILY	
<i>Phacelia distans</i>	blue phacelia	annual herb
LAMIACEAE	MINT FAMILY	
<i>Salvia carduacea</i>	thistle sage	annual herb
LENNOACEAE	LENNOA FAMILY	
<i>Pholisma arenarium</i>	sand plant	perennial, parasitic herb
LOASACEAE	LOASA FAMILY	
<i>Mentzelia albicaulis</i>	white-stemmed stick-leaf	annual herb
ONAGRACEAE	EVENING PRIMROSE FAMILY	
<i>Chylismia claviformis</i>	brown-eyed evening-primrose	annual herb
<i>Eremothera boothii</i> ssp. <i>desertorum</i>	woody bottle-washer	annual herb
<i>Oenothera</i> sp.	evening-primrose	annual or perennial herb
POLEMONIACEAE	PHLOX FAMILY	
<i>Eriastrum eremicum</i> ssp. <i>eremicum</i>	desert woolly-star	annual herb
<i>Gilia</i> sp.	gilia	annual herb
<i>Loeseliastrum matthewsii</i>	desert calico	annual herb
POLYGONACEAE	BUCKWHEAT FAMILY	
<i>Chorizanthe brevicornu</i> var. <i>brevicornu</i>	brittle spineflower	annual herb
<i>Chorizanthe watsonii</i>	Watson's spineflower	annual herb
<i>Eriogonum fasciculatum</i>	California buckwheat	shrub
<i>Eriogonum gracillimum</i>	rose-and-white wild buckwheat	annual herb
<i>Eriogonum maculatum</i>	spotted wild buckwheat	annual herb
SOLANACEAE	NIGHTSHADE FAMILY	
<i>Datura wrightii</i>	jimson weed	perennial herb
<i>Lycium andersonii</i>	Anderson's wolfberry	shrub
<i>Lycium cooperi</i>	Cooper's wolfberry	shrub
ZYGOPHYLLACEAE	CALTROP FAMILY	
<i>Larrea tridentata</i>	creosote bush	shrub
MONOCOT FLOWERING PLANTS		
POACEAE	GRASS FAMILY	
<i>Bromus berterioanus</i> ¹	Chilean chess	annual grass
<i>Bromus rubens</i> ¹	red brome, foxtail chess	annual grass
<i>Bromus tectorum</i> ¹	cheatgrass	annual grass
<i>Cynodon dactylon</i> ¹	Bermuda grass	perennial grass
<i>Hordeum murinum</i> ¹	wall barley	annual grass
<i>Schismus arabicus</i> ¹	Arabian grass	annual grass
<i>Schismus barbatus</i> ¹	Mediterranean grass	annual grass
<i>Stipa hymenoides</i>	sand rice grass	perennial grass
<i>Stipa speciosa</i>	desert needlegrass	perennial grass
TYPHACEAE	CATTAIL FAMILY	
<i>Typha</i> sp.	cattail	perennial herb

¹ non-native weed

² California Desert Native Plants Act species

Appendix B. Animal Species Detected

The following animal species were detected by CMBC during the general biological inventories conducted in July and September 2026. **Special status animal species are highlighted in red and signified by “(SSA)” following the common names.** Those only found in adjacent areas are signified by “+.”

REPTILIA

Testudinidae

Gopherus agassizii

Iguanidae

Dipsosaurus dorsalis

Uta stansburiana

Teiidae

Cnemidophorus tigris

Colubridae

Masticophis flagellum piceus

Pituophis melanoleucus

Viperidae

Crotalus cerastes

AVES

Columbidae

Streptopelia decaocto

Zenaida macroura

Tytonidae

Tyto alba

Strigidae

Bubo virginianus

Athene cunicularia

Trochilidae

Calypte costae

Tyrannidae

Sayornis saya

Myiarchus cinerascens

Tyrannus verticalis

REPTILES

Land tortoises

Agassiz's desert tortoise (SSA)

Iguanids

Desert iguana

Common side-blotched lizard

Whiptails

Western whiptail

Colubrids

Red racer

Gopher snake

Vipers

Sidewinder

BIRDS

Pigeons and doves

Eurasian collared-dove

Mourning dove

Barn Owls

Common barn owl

Typical owls

Great horned owl

Burrowing owl (SSA)

Hummingbirds

Costa's hummingbird

Tyrant flycatchers

Say's phoebe

Ash-throated flycatcher

Western kingbird

Alaudidae
Eremophila alpestris

Corvidae
Corvus corax

Sturnidae
Sturnus vulgaris

Remizidae
Auriparus flavipes

Troglodytidae
Salpinctes obsoletus

Laniidae
Lanius ludovicianus

Emberizidae
Amphispiza bilineata

Fringillidae
Carpodacus mexicanus

Passeridae
Passer domesticus

MAMMALIA

Leporidae
Lepus californicus
Sylvilagus audubonii

Sciuridae
Ammospermophilus leucurus

Geomyidae
Thomomys bottae

Heteromyidae
Dipodomys sp.

Castoridae
Castor canadensis

Larks
Horned lark

Crows and jays
Common raven

Starlings
European starling

Verdins
Verdin

Wrens
Rock wren

Shrikes
Loggerhead shrike (SSA)

Sparrows, warblers, tanagers
Black-throated sparrow

Finches
House finch

Weavers
House sparrow

MAMMALS

Hares and rabbits
Black-tailed hare
Audubon cottontail

Squirrels
Antelope ground squirrel

Pocket gophers
Botta pocket gopher

Pocket mice
Kangaroo rat

Beavers
Beaver

Canidae*Canis latrans**Vulpes macrotis***Foxes, wolves and coyotes**

Coyote

Kit fox (SSA)

Mustelidae*Taxidea taxus***Weasels and skunks**

American badger (SSA)

Felidae*Lynx rufus***Cats**

Bobcat

Nomenclature follows Stebbins, *A Field Guide to Western Reptiles and Amphibians* (2003), third edition; Sibley, National Audubon Society, the Sibley Guide to Birds (2000), first edition; and Ingles, *Mammals of the Pacific States* (1965), second edition.

Appendix C. Field Data Sheets

The USFWS recommends that consultants include copies of field data sheets from which the results and conclusions given in their reports are derived. As such, copies of the data sheets completed by Ed LaRue on July 8, 9, and 10 and September 3, 2026 follow.

Version: October 8, 2019

Date of survey: 8-10-1/2026 Survey biologist(s): Ed LaRue, S. Seville, T. Bailey
(day, month, year) (name, email, and phone number)

Site description: 50-acre site plus transmission lines = Proposed Data Center
(project name and size; general location)

County: Keon Quad: Imyden Location: 426750/3945130 (NAD 83)
(UTM coordinates, lat-long, and/or TRS; map datum)

Circle one: 100% coverage or Sampling Area size to be surveyed: 50 acres + Transect #: 51 Transect length: Variable

GPS Start-point: 426750/3945110 (2,440 feet) Start time: Variable am/pm over 30 days
(easting, northing, elevation in meters)

GPS End-point: 427095/3945395 (2,912 feet) End time: Variable am/pm see report
(easting, northing, elevation in meters)

Start Temp: See °C report End Temp: See °C report

Live Tortoises

Detection number	GPS location		Time	Tortoise location (in burrow; all of tortoise beneath plane of burrow opening, or not in burrow)	Approx MCL ≥180 mm? (Yes, No or Unknown)	Existing tag # and color, if present
	Easting	Northing				
1						
2						
3						
4						
5						
6						
7						
8						

Tortoise Sign (burrows, scats, carcasses, etc)

Detection number	GPS location		Type of sign (burrows, scats, carcass, etc)	Description and comments
	Easting	Northing		
1				
2				
3				
4				
5				
6				
7				
8				

OTHER SPECIES								
SPECIES	EAST	NORTH	SPECIES	EAST	NORTH	SPECIES	EAST	NORTH
KPR(A)	7957/	5883	Rubio	7985/5710(2)		KPR(A)	8380/6007	
Wdr mnd	7972/	5854	Rubio	8000/5780		KPR(C)	8313/6121	
LoSH	7910/	5905	Rubio	8017/5781		KPR(C)	8125/6038	
Rubio	7971/	5782(2)	Wdr mnd	8190/5763		Buow(P)	8000/5860	
Dwt mnd	Wdr mnd	8833/5833	DESERT TORTOISE SCAT			KPR(A)	8413/6403	
SCAT	EAST	NORTH	SCAT	EAST	NORTH	SCAT	EAST	NORTH
NTY 16	8061/	5937	NTY 16	8303/6189		NTY 17	8651/5951	
NTY 17	8057/	5950	2NTY 13	8299/6163		NTY 14	8633/5864	
NTY 16	8185/	5708	NTY 15	8222/6189		NTY 16	7938/6330	
			TY 14	8133/6161		TY 11	8297/6483	
NTY 16	8220/	5948	TY 20	8127/6187				
NTY 16	7929/	6030	2TY 22	8020/6188				
NTY 9	7806/	6070	NTY 16	8003/6191				
NTY 18	7924/	6003	NTY 10	7859/6251				
NTY 16	7945/	6099	TY 18	7992/6225				
NTY 17	8216/	6180	TY 20	8002/6258				
NTY 21	8540/	5982	TY 16(2)	8080/6219				
TY 17	8603/	5843	TY 15	8399/6208				
TY 12	8560/	6070	TY 16	8374/6195				
NTY 14	8308/	6161	NTY 12	8485/6136				
TORTOISES								
DESCRIPTION		EAST/NORTH		DESCRIPTION		EAST/NORTH		
CARCASSES								
DESCRIPTION		EAST/NORTH		DESCRIPTION		EAST/NORTH		
3 Ad 1-4 8061/5937								
BURROWS								
DESCRIPTION		EAST/NORTH		DESCRIPTION		EAST/NORTH		
60x0.25x Fair 8045/6231								
200x0.25x Fair 8056/6223								
8456/6134 8468/6260 8059/6367 8476/6427 8780/5690								
7950/5909 8234/5830(2) 8133/6070 8546/5951 8251/6490 8352/6254								

Topography and soils:

USFWS 2009 DESERT TORTOISE PRE-PROJECT SURVEY DATA SHEET

Date of survey: 3/9/2026 Survey biologist(s): Edgarue Tracy Boly
(day, month, year)
 Site description: 9500000-Stein China Lake NWS + 200 ft influence
(project name and size, general location)
 County: Kern Quad: Dwyden Location: 428099/3945800 (NAD83)
(UTM coordinates, lat-long, and/or TRS; map datum)
 Transect #: 44 Transect length: Variable Type of survey: 100% coverage
(project area size to be surveyed; 100% coverage/probabilistic sampling)
 GPS Start-point: 427900/3945900, 2420 ft Start time: 0645 am
(easting, northing, elevation in meters)
 GPS End-point: 428310/3945800, 2423 ft End time: 1545 am
(easting, northing, elevation in meters)
 Start Temp: 58 F Weather: Calm 11 mph, 0% cloud
 End Temp: 95 F

Live Tortoises

Detection number	GPS location Easting Northing		Time	Tortoise location (in burrow; all of tortoise beneath plane of burrow opening, or not in burrow)	Approx MCL >160-mm? (Yes, No or Unknown)	Existing tag # and color, if present
1						
2						
3						
4						
5						
6						
7						
8						

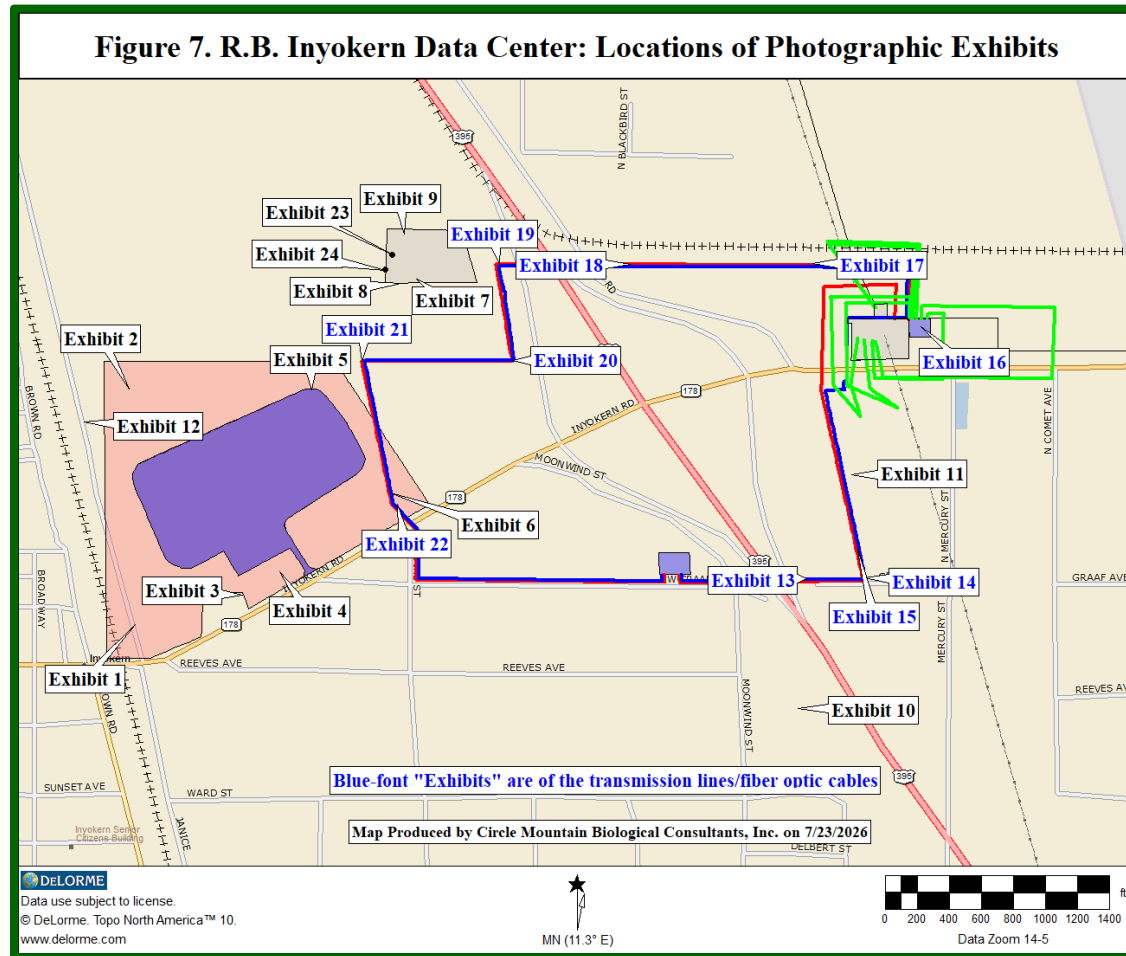
Tortoise Sign (burrows, scats, carcasses, etc)

Detection number	GPS location Easting Northing		Type of sign (burrows, scats, carcass, etc)	Description and comments
1				<u>See Report</u>
2				<u>36 adult + subadult scats (33 + 3 reported)</u>
3				<u>2 inactive adult burrows</u>
4				<u>1 adult ♂ tortoise carcass, dead 1-4 yrs</u>
5				
6				
7				
8				

Page: 2 of 2

Date of survey:

Appendix D. Photographic Exhibits



Locations of the 24 photographic exhibits on the next 12 pages are depicted in Figure 7. Exhibit titles shown in blue font in Figure 8 and below signify exhibits along linear features.



Exhibit 1. View from the southwest corner of the parcel, facing northeast (see Figure 7 for locations and directions of photographs).



Exhibit 2. View from the northwest corner of the parcel, facing southeast.



Exhibit 3. View of an asphalt pile that was checked for burrowing owl signs (none found).



Exhibit 4. Concrete slab dump checked for burrowing owl signs (none found).



Exhibit 5. View from the northeast corner of the parcel, facing southwest.



Exhibit 6. View from the southeast corner of the parcel, facing northwest.



Exhibit 7. Inactive kit fox den in northeastern borrow pit; no owl signs found in July, an owl flushed in September.

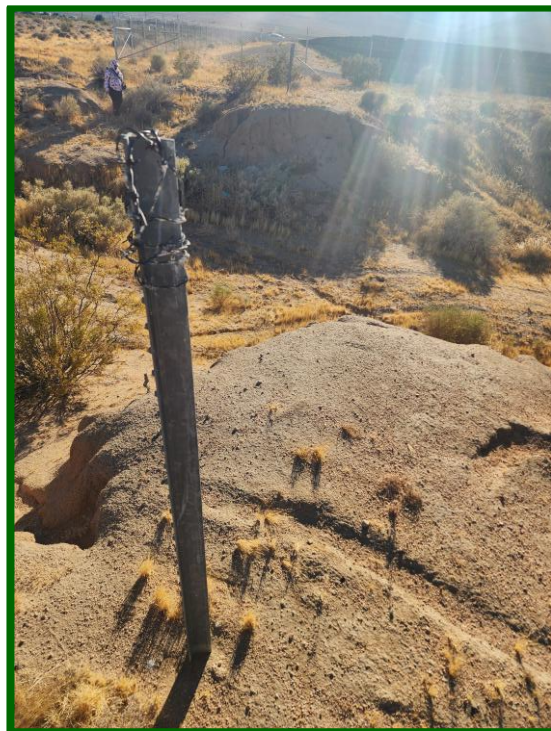


Exhibit 8. Old whitewash (no pellets) on the top of a metal pole in July, fresh white wash at the base in September.



Exhibit 9. Banks that once had two family groups of burrowing owls, had only old sign in July but fresh owl sign including one owl in September.



Exhibit 10. Dirt hills inspected for owl signs are likely too soft to serve as perches.



Exhibit 11. Inactive kit fox den with older burrowing owl pellets, no whitewash.



Exhibit 12. Perch site with whitewash on the pole and rocks below, but no owl pellets.



Exhibit 13. View of southern proposed⁷ linear facilities near Highway 395, facing east.



Exhibit 14. View from the southeast corner of linear facilities, facing west.

⁷ In the interest of saving space, the word, “proposed,” is not reiterated but is implied for all subsequent exhibits.



Exhibit 15. View from the same point as Exhibit 14, facing north along linear facilities.



Exhibit 16. View from the southeast corner of the proposed small substation, facing northwest.



Exhibit 17. View from the near the northeast corner of linear facilities, facing west.



Exhibit 18. View of the northern linear facilities from near Highway 395, facing east.



Exhibit 19. View of the north-central part of the linear facilities, facing south.



Exhibit 20. View of the northwest-central part of the linear facilities, facing west.



Exhibit 21. View from the northwest corner of linear facilities, facing south.



Exhibit 22. View from near the southwest corner of linear facilities, facing north.



Exhibit 23. Six of seven pre-fledgling burrowing owls in Northern Mine Pit on 6/4/2023.



Exhibit 24. Adult burrowing owl at burrow in the Northern Borrow Pit on 6/18/2023, displaying to a black-tailed hare at a motion camera. Note abundance of fresh whitewash at the top of nearby vertical bank.

Appendix E. Locations of Drainages and Associated Exhibits.

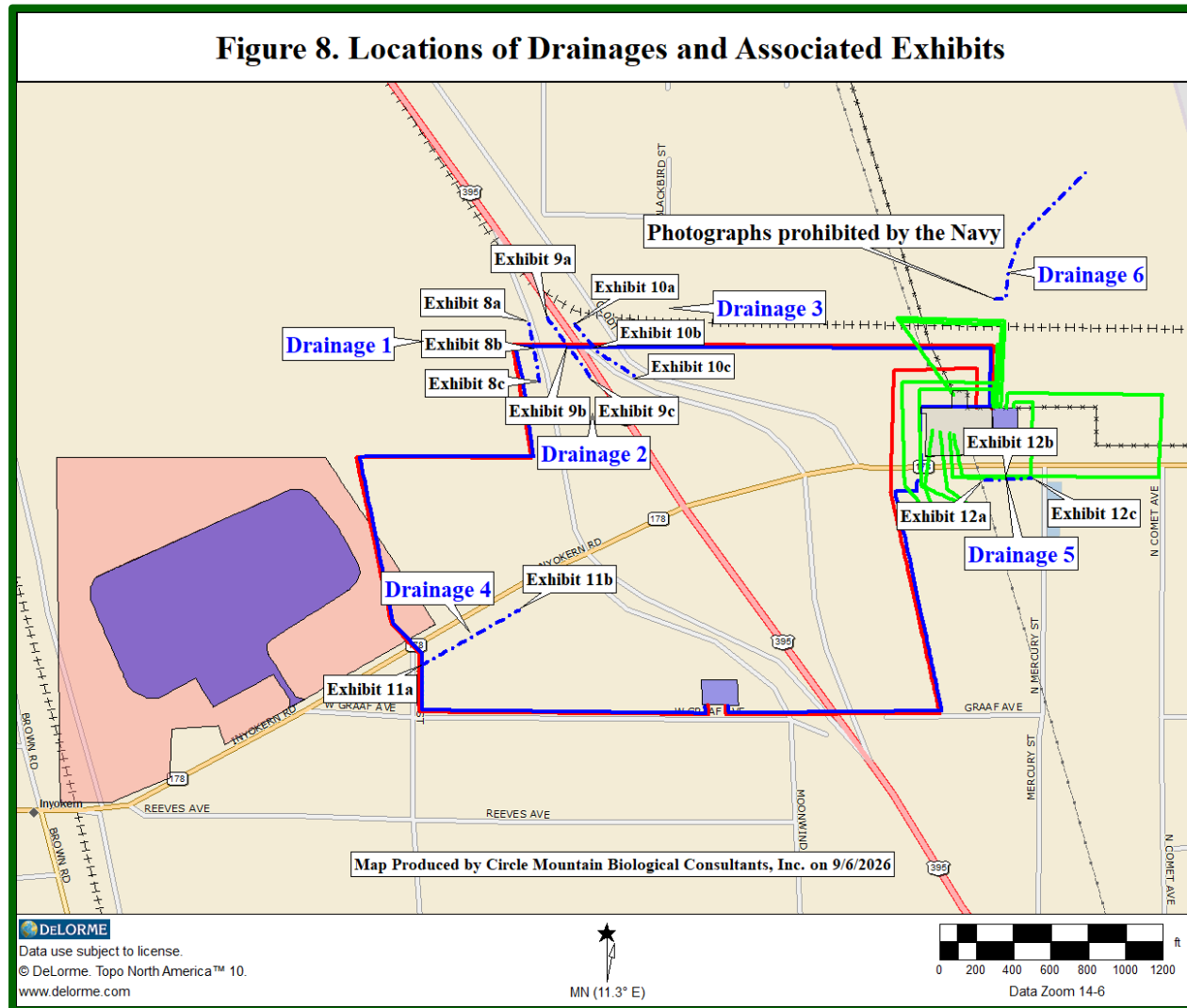




Exhibit 8a. Drainage 1, 50 meters north of crossing, facing south.



Exhibit 8b. Drainage 1 at right-of-way crossing, facing north.



Exhibit 8c. Drainage 1, 50 meters south of crossing, facing north.



Exhibit 9a. Drainage 2, 50 meters north of crossing, facing south.



Exhibit 9b. Drainage 2 at right-of-way crossing, facing south.



Exhibit 9c. Drainage 2, 50 meters south of crossing, facing north.



Exhibit 10a. Drainage 3, 50 meters north of crossing, facing south.



Exhibit 10b. Drainage 3 at right-of-way crossing, facing north.



Exhibit 10c. Drainage 3, 50 meters south of crossing, facing north.



Exhibit 11a. Drainage 4, west end at right-of-way, facing east.

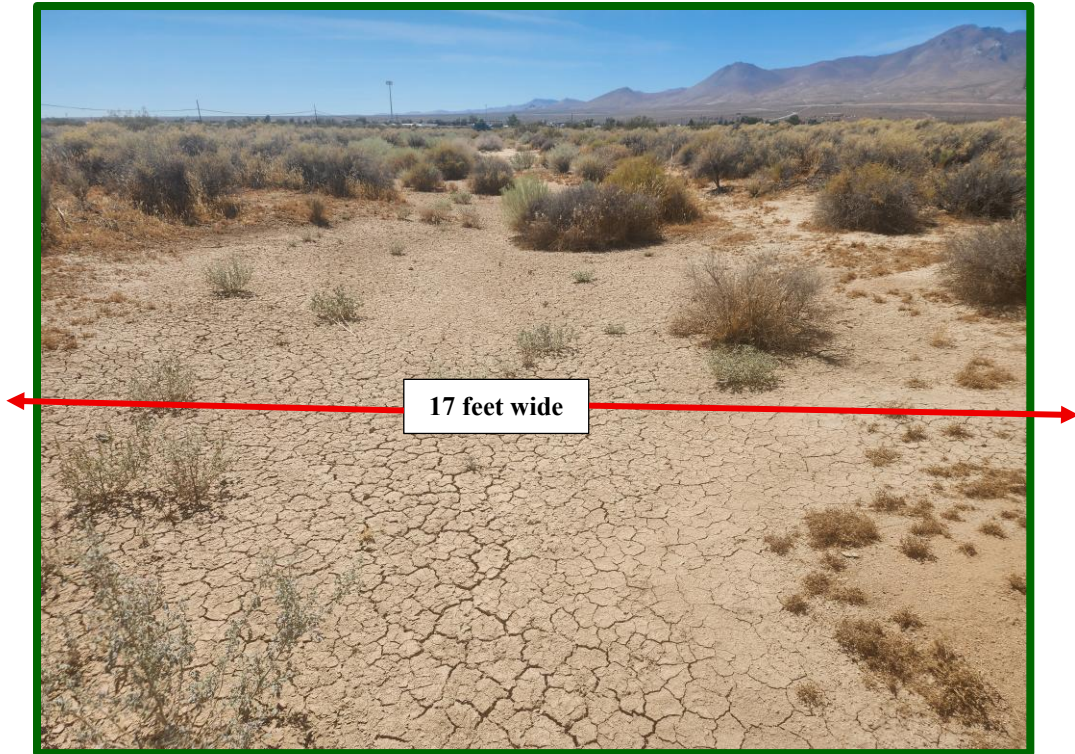


Exhibit 11b. Drainage 4, eastern terminal point with pooling, facing west.

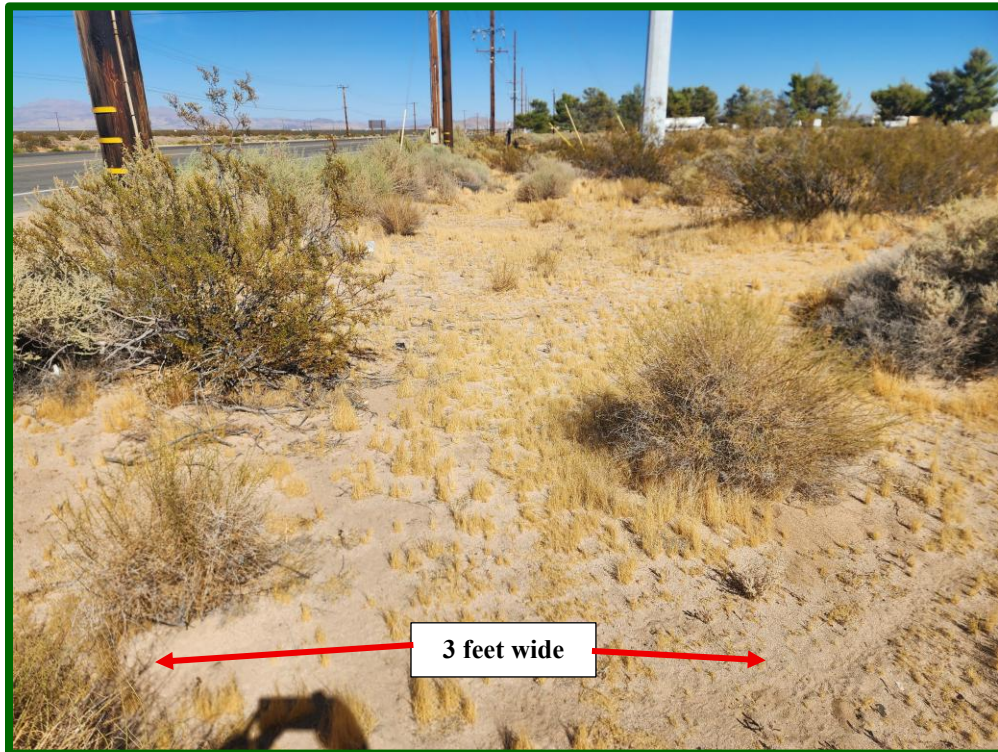


Exhibit 12a. Drainage 5, 30 meters west of crossing, facing east.



Exhibit 12b. Drainage 5 at right-of-way crossing, facing west.

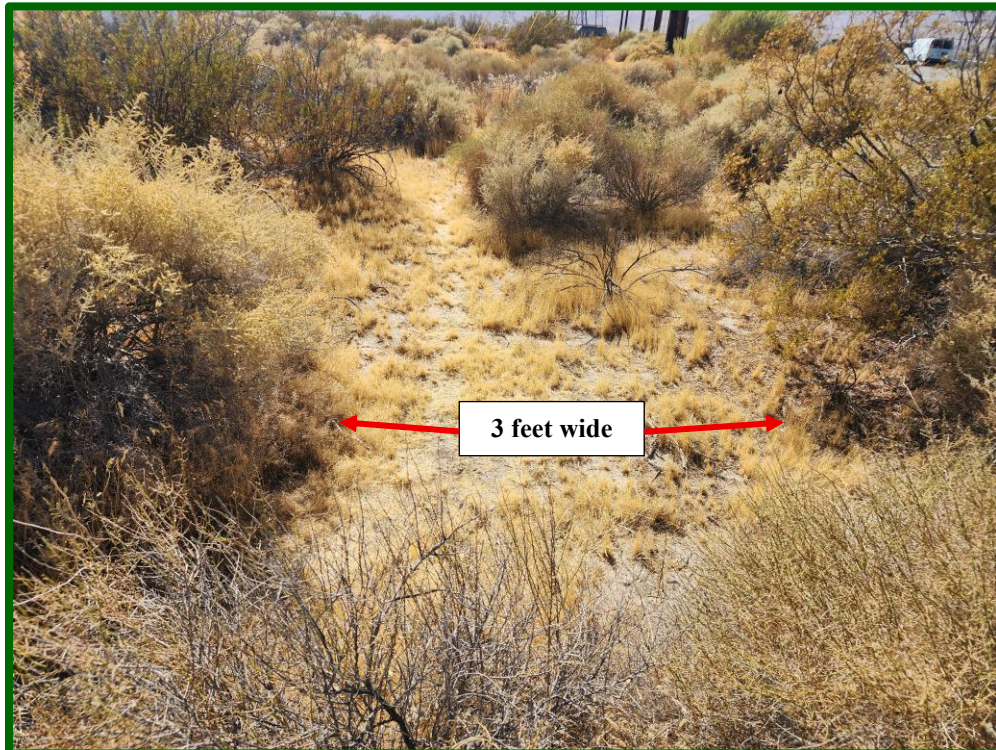


Exhibit 12c. Drainage 5, 30 meters east of crossing, facing west.

**Summer Rare Plant Survey
RB Inyokern Data Center
Inyokern, California
Summer 2026**

Prepared by:

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September 7, 2026

INTRODUCTION

A protocol-level rare plant survey was conducted at the RB Inyokern Data Center project site in March 2024 (QK 2026), resulting in no special status plants, other than plants listed in the California Desert Native Plant Act (CDNPA). Often, a protocol-level rare plant survey requires more than one field visit to adequately capture the floristic diversity of a project area (CDFW 2018). For example, rare plants that have some potential to occur in a project area may be detectable only during certain times of the year. If this is the case, then multiple surveys would be necessary in a project area to determine presence or absence of these species. The 2024 survey likely satisfies the protocol requirements for early-blooming species. However, because there could be potential for summer blooming species to occur in the area, another survey would be necessary. The current survey focused on species that flower in the summer through fall period and should satisfy the protocol requirements for later-blooming rare plants on the Project Site.

METHODS

PRE-SURVEY INVESTIGATIONS

A list of special status plants and sensitive natural communities that occur or appear to have some potential to occur on the Project Site was developed using information from the California Natural Diversity Database (CNDDDB 2026c). The database search included the following nine topographic maps (USGS quadrangles, 7.5-minute series). The Project Site occurs on the Inyokern quadrangle.

Ninemile Canyon	Pearsonville	White Hills
Owens Peak	Inyokern	Ridgecrest North
Freeman Junction	Inyokern SE	Ridgecrest South

The search also included a query of CNDDDB QuickView (CNDDDB 2026b), a free Internet application, to determine if there were 1) any records that have not been processed in the CNDDDB or 2) any records for California Rare Plant Rank (CRPR) 3 and CRPR 4 plant species, which are often not found during the CNDDDB search.

A special status plant species or sensitive natural community was judged to occur on the Project Site if there were locality records, either historic or recent, indicating its presence. A species was judged to have some potential for inhabiting the Project Site if it is known to occur in the same general area, in a similar habitat, and/or at a similar elevation as the Project Site. A species was included on the special status list if it fell into one or more of the following categories (CDFW 2026c, 2026d; California Native Plant Society [CNPS] 2026):

- taxa that are officially listed or proposed for listing under the State and/or Federal Endangered Species Acts;
- taxa that are State or Federal candidates for possible listing;
- taxa listed in the CNPS's *Inventory of Rare and Endangered Plants of California*;
- taxa which meet the criteria for listing, even if not currently included on any list, as described in Section 15380 of the California Environmental Quality Act (CEQA) Guidelines (e.g., all CRPR 1 and CRPR 2 and some CRPR 3 and CRPR 4 plants may fall under Section 15380 of CEQA);
- taxa that are biologically rare, very restricted in distribution, or declining throughout their range but not currently threatened with extirpation;

- populations in California that may be on the periphery of a taxon's range but are threatened with extirpation in California; and taxa closely associated with a habitat that is declining in California at a significant rate (e.g., wetlands, riparian, old growth forests, desert aquatic systems, native grasslands, vernal pools, etc.).

In addition, taxa protected under the California Desert Native Plants Act (CDNPA) (Division 23 of the California Food and Agricultural Code, Section 80071-80075), which include cacti and yuccas, were also considered. These taxa include:

- Smoke tree (*Psoralea argophylla*);
- all native species in the genus *Prosopis*, i.e., mesquites;
- all native species in the genus *Nolina*, i.e., beargrass;
- all native species in the family *Cactaceae*, i.e., cacti; and
- all native species in the family *Agavaceae*, i.e., century plants (*Agave* spp.), Joshua trees and other *Yucca* spp., desert lilies (*Hesperocallis undulata*).

Although Federal and/or State threatened or endangered species, candidate species for listing, or proposed threatened or endangered species receive legal protection, other special status species do not. However, local, State, and Federal resource agencies typically require that these species be considered during the planning process for projects because 1) they either are declining at a rate that could result in a State and/or Federal listing or they have historically occurred in low numbers, and 2) known threats to their persistence currently exist. Designations and rankings of special status species are intended to focus attention on the species to help avert the need for costly listing and recovery efforts required under Federal and/or State endangered species laws.

The summer rare plant survey was conducted by biologist Denise LaBerteaux with EREMICO Biological Services, LLC. Prior to conducting the field survey on the Project Site, the field investigator reviewed the physical description, habitat description, drawings, and photographs of each potentially occurring special status plant species. Sources for information on each species included floras (Abrams and Ferris 1923-1960, Baldwin et al. 2012, Jepson Flora Project 2022), field guides (Jaeger 1940, MacKay 2013), and other sources (CNPS 2026; University of California 2026). The field crew also developed a list of known locations for summer/fall blooming rare plants in the general vicinity of the Project Site based on CNDDB records. Immediately prior to the protocol-level rare plant survey, the crew visited some of these locations to become familiar with the rare plant's appearance and habitat and to determine if it would be detectable at the time of the survey.

SUMMER PROTOCOL-LEVEL RARE PLANT SURVEY

The field investigator conducted the rare plant survey on the Project Site on July 13-15, August 29, and September 3, 2026. The field survey consisted of a full coverage survey following the survey protocols for California special status plant species (CDFW 2018). The Botanical Survey Area included the 50-acre Project Site, approximately 6.44 miles of associated linear features (two alternative routes for a fiber optic line, two alternative routes for a 115 kV line, various Southern California Edison [SCE] lines), and a buffer area 50 m beyond the outermost SCE lines. The field investigator systematically walked 10-m wide parallel line transects over the entire Project Site and the SCE buffer area and walked the centerline of the fiber optic lines and 115 kV lines, surveying 5-10 meters on each side. If any special status plant was encountered, its location was

recorded using the data recording application GAIA GPS v2026.4.3 running on an Apple iPhone. A Bluetooth connected mapping grade GPS (Bad Elf GNSS) with 1-m horizontal accuracy provided the locational data to the smart phone. Information collected for each special status plant, if any, was sent to the CNDDDB. During the survey, the field investigator also identified natural communities occurring in the area. A Combined Vegetation Rapid Assessment and Relevé Field Form (CDFW and CNPS 2025) was completed for each sensitive natural community, if any was identified during the survey, as stipulated in the survey protocol (CDFW 2018).

In addition to searching for summer/fall blooming special status plants, the field investigator assessed the habitats in the Botanical Survey Area for their potential in supporting winter/spring blooming special status plants. Results of this assessment may indicate the need for another survey during the winter/spring blooming period.

The summer protocol-level rare plant survey was floristically based, that is, the field investigator identified all plant species that were encountered in the Botanical Survey Area to at least genus and to the level necessary to ensure that they were not plant species of concern. Nomenclature throughout this report follows *Jepson eFlora* (Jepson Flora Project 2026).

RESULTS

PRE-SURVEY INVESTIGATIONS

DATABASE SEARCH AND LITERATURE REVIEW

During the database search and literature review, no sensitive natural community was identified as occurring in the vicinity of the Biological Survey Area (CDFW 2026a). However, 28 special status plant species were identified as occurring in the nine-quadrangle search area (Table 1). These species included the Mojave tarplant (*Deinandra mohavensis*), a State-listed Endangered Species, and the western Joshua tree (*Yucca brevifolia*), a State Candidate Species for Listing as Threatened (CDFW 2026d). Fourteen species are California Rare Plant Rank (CRPR) 1B plants, which are rare and endangered in California and elsewhere, and 12 species are CRPR 4, which is a watch list of plants with limited distribution and limited information (CNPS 2026; Table 1). Only 10 of the 28 species were deemed to have some potential of occurring in the Biological Survey Area, albeit very low to low potential, based on habitat requirements, elevational range, and/or occurrence records near the Biological Survey Area (Table 1). However, because of its status as a State Endangered Species, the Mojave tarplant remained on the list of plants to consider during the survey. It should be noted that the potential for occurrence listed in Table 1 was evaluated prior to the botanical survey. The final assessment of occurrence was based on the results of this survey.

The only rare plant species on the search list that could be detectable during the summer rare plant survey are Mojave tarplant, western Joshua tree, Death Valley sandmat (*Euphorbia vallis-mortae*), and Mojave fish-hook cactus (*Sclerocactus polyancistrus*). The remaining seven species are annual and perennial herbs that bloom in late winter and spring and would be dried up and unidentifiable during the time of the survey. The winter/spring-blooming species should have been observable during the 2024 spring survey (QK 2024) if they occurred on the Project Site, given that it was a super-bloom year.

The Mojave tarplant and the three rare plants with some potential to occur in the Biological Survey Area are described below:

Mojave Tarplant. Mojave tarplant, listed as an Endangered Species on the California Endangered Species Act in 1981 (CDFW 2026b), is an aromatic, sticky, annual herb in the sunflower family. It occurs at an elevation of 640-1600 m above mean sea level (AMSL) and grows to 100-150 cm in height. Leaves are entire, sometimes serrate, hairy, and sometimes stalked-glandular. Inflorescence heads are generally in tight groups, or more or less crowded but sometimes in open, panicle-like clusters. Phyllaries are more or less evenly stalked-glandular and more or less hairy. Paleae are in one series. There are five ray flowers that are deep yellow and measure 4-7 mm and six disk flowers. Anthers are yellow or more or less brown. Pappus has 5-9, often fused, irregular, awl-shaped to square, deeply-cut scales (Baldwin et al. 2012). Mojave tarplant grows in moist soils in openings of chaparral, desert scrub, or woodland. It blooms from approximately June through October. This species is threatened by development, grazing, hydrological alterations, recreational activities, road maintenance, and vehicles (CNPS 2026). The closest known population to the Project Site is approximately 7.4 miles away towards the northwest in Short Canyon on the east slope of the Sierra Nevada (CNDDB 2026b).

Western Joshua Tree. Western Joshua tree became a candidate species for listing as Threatened under CESA in 2020 (California Fish and Game Commission [CFGF] 2020). It is

an evergreen, tree-like plant that can grow to 15 m in height and be extensively branched. Its leaves are stiff, 15-35 cm long, and dark green. Leaf margins are yellow and minutely serrate. Flowers are 4-7 cm long, cream to pale green, fleshy, and erect. Fruits are 6-8.5 cm long and dry, spongy, or leathery. Western Joshua trees occur on flats and slopes in a variety of plant communities in the Mojave Desert (Baldwin et al. 2012). They can form a Joshua Tree Woodland Alliance when they are evenly distributed on the landscape with an absolute cover is at least one percent (Sawyer et al. 2009). Western Joshua trees add a three-dimensionality to the landscape, providing additional habitat structure and food resources for many wildlife species, especially birds. The single greatest threat to western Joshua trees is climate change. Other threats include wildfires, habitat loss to development, invasive species, and predation (Center for Biological Diversity 2019). It is known to occur south of the Project Site.

Death Valley Sandmat. In the spurge family, the Death Valley sandmat is a prostrate to decumbent perennial herb and is a CRPR 4 plant. The leaves are 4-6 mm, and the proximal stipules are fused while the distal ones are thread-like and separate. The inflorescences are clustered at branch tips, and the involucre are less than 2.5 mm and bell-shaped. The oblong gland is less than 1 mm. The white appendage is wider than the gland and is entire to scalloped. The plant is tomentose throughout. This plant occurs in sandy to gravelly substrates in the Mojave Desert from Owens Valley to the town of Joshua Tree, blooming from May to October. Populations are known from the foothills of the Sierran Nevada, west and southwest of the Project Site. Threats to this species include vehicles, grazing, and possibly solar and wind energy developments (Baldwin et al. 2012, CNPS 2026).

Mojave Fish-hook Cactus. A CRPR 4 plant, the Mojave fish-hook cactus is also a CDNPA species, threatened by horticultural collecting, herbivory by insects, and vehicles and possibly by grazing and development. This showy cactus blooms from April to July and has large rose-purple to magenta flowers. Its stem is cylindrical, 10-45 cm tall, with 13-17 ribs. Spines are white, red, or dark reddish brown, the central ones being of 2 kinds – hooked (5-10 cm) and straight (3.7-8.6 cm). The radial spines (2-5 cm) number 10-15 per areole and are white and flat. This cactus usually occurs on carbonate soils in Great Basin scrub, Joshua tree woodland, and Mojavean desert scrub at 640-2320 m AMSL. It occurs on alluvial slopes, hills, and in canyon in the Mojave Desert region of California and Nevada. It is known from Red Rock Canyon State Park and the El Paso Mountains, south of the Project Site (Baldwin et al. 2012, CNPS 2026).

Table 1. Special Status Plants Known to Occur in the Region.

SCIENTIFIC NAME COMMON NAME PLANT FAMILY, LIFE FORM	RANK OR STATUS ¹				FLOWERING PERIOD	HABITAT AND DISTRIBUTION NOTES	POTENTIAL FOR OCCURRENCE (PRE- SURVEY) ²
FEDERAL/ STATE	G-RANK	S-RANK	CRPR				
FEDERAL/STATE LISTED							
<i>Deinandra mohavensis</i> Mojave tarplant Asteraceae, annual herb	-/E	G3	S3	1B.3 E	June-October	640-1600 m. Mesic. Chaparral, coastal scrub, riparian scrub. Known to occur northwest of Project Site in Short Canyon.	NONE – project site has no mesic habitat
<i>Yucca brevifolia</i> western Joshua tree Agavaceae, tree-like	-/CT	-	-	-	April-May	400-2000 m. Desert flats, slopes. Chenopod scrub, Mojavean desert scrub, Joshua tree woodland. Known to occur west of the Project site in the Sierra foothills.	LOW
CRPR 1B							
<i>Allium shevockii</i> Spanish Needle onion Alliaceae, perennial bulbiferous herb	-/-	G2	S2	1B.3 E	May-June	850-2500 m. Rocky areas. Pinyon and juniper woodland, upper montane coniferous forest.	NONE – Project site has no habitat for this species
<i>Camissonia integrifolia</i> Kern River evening-primrose Onagraceae, annual herb	-/-	G2	S2	1B.3 E	April-May	700-1200 m. Toeslopes and terraces along drainages; openings in habitat with sandy soil. Chaparral, Mojavean desert scrub. Known only from the foothills of the Southern Sierra Nevada.	NONE – Restricted distribution; only occurs in Southern Sierra Nevada foothills
<i>Carlquistia muirii</i> Muir's tarplant Asteraceae, perennial herb	-/-	G2	S2	1B.3 E	July-August	1185-2500 m. Crevices of granitic ledges and dry sandy soils. Montane chaparral, lower montane coniferous forest, upper montane coniferous forest. Occurs near summit of Owens Peak.	NONE – Project site has no habitat for this species
<i>Delphinium purpusii</i> rose-flowered larkspur Ranunculaceae, perennial herb	-/-	G3	S3	1B.3 E	April-May	300-1340 m. On shady, rocky slope, often on carbonate. Chaparral, cismontane woodland, pinyon and juniper woodland. Known to occur along Pacific Crest Trail SW of Owens Peak.	NONE – Project site has no habitat for this species
<i>Ericameria gilmanii</i> Gilman's goldenbush Asteraceae, shrub	-/-	G2	S2	1B.3 E	August-September	2100-3400 m. Rocky sites in open coniferous forests, generally on limestone but can be on granite. Subalpine coniferous forest, upper montane coniferous forest. Occurs on east slope of Owens Peak.	NONE – Project site has no habitat for this species

SCIENTIFIC NAME COMMON NAME PLANT FAMILY, LIFE FORM	RANK OR STATUS ¹				FLOWERING PERIOD	HABITAT AND DISTRIBUTION NOTES	POTENTIAL FOR OCCURRENCE (PRE-SURVEY) ²
	FEDERAL/STATE	G-RANK	S-RANK	CRPR			
<i>Erigeron aequifolius</i> Hall's daisy Asteraceae, perennial herb	-/-	G3	S3	1B.3 E	June-August	1500-2440 m. On dry rock outcrops in granitic walls and canyons. Broadleafed upland forest, lower montane coniferous forest, pinyon and juniper woodland, upper montane coniferous forest. Occurs on NE slope of Owens Peak.	NONE – Project site has no habitat for this species
<i>Eriophyllum mohavense</i> Barstow woolly sunflower Asteraceae, annual herb	-/-	G2	S2	1B.2 E	March-May	500-950 m. Gravelly, silty, sandy, or clay soils on level or sloping terrain, as well as in low-lying areas. Chenopod scrub, Mojavean scrub, playas. Known to occur near Soldier Spring.	LOW
<i>Layia heterotrichia</i> pale-yellow layia Asteraceae, annual herb	-/-	G2	S2	1B.1 E	March-June	300-1705 m. Alkaline or clay. Cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland. Unverified occurrence 3 miles south of Freeman Junction.	LOW
<i>Lomatium shevockii</i> Owens Peak lomatium Apiaceae, perennial herb	-/-	G1	S1	1B.2 E	April-May	1770-2535 m. In colluvial slopes and talus, usually along contact zones of metamorphic and granitic rock. Lower montane coniferous forest, upper montane coniferous forest. Known to occur near summit of Owens Peak.	NONE – Project site has no habitat for this species
<i>Monardella beneolens</i> Sweet-smelling monardella Lamiaceae, perennial herb	-/-	G2	S2	1B.3 E	June-September	2475-3500 m. Granitic soils. Alpine boulder and rock field, subalpine coniferous forest, upper montane coniferous forest. Occurs near summit of Owens Peak.	NONE – Project site has no habitat for this species
<i>Nemacladus bellus</i> Beautiful threadplant Campanulaceae, annual herb	-/-	G2	S2	1B.3 E	May-July	800-1800 m. Granitic gravel or sandy flats. Cismontane woodland, Joshua tree woodland. 1995 record east of Walker Pass in Joshua tree woodland.	NONE – Project site has no woodlands
<i>Phacelia nashiana</i> Charlotte's phacelia Hydrophyllaceae, annual herb	-/-	G3	S3	1B.2 E	March-June	600-2200 m. Usually granitic, sandy or rocky areas on steep slopes or flats. Joshua tree woodland, Mohavean desert scrub; pinyon and juniper woodland. Known to occur in and below canyons on the east slope of the Sierra Nevada.	LOW
<i>Phacelia novenmillensis</i> Nine Mile Canyon phacelia Hydrophyllaceae, annual herb	-/-	G3	S3	1B.2 E	May-June	1645-2640 m. Gravelly (sometimes), sandy (sometimes). Broadleaf upland forest, cismontane woodland, pinyon and juniper woodland, upper montane coniferous forest.	NONE – Project site has no habitat for this species

SCIENTIFIC NAME COMMON NAME PLANT FAMILY, LIFE FORM	FEDERAL/ STATE	RANK OR STATUS ¹			FLOWERING PERIOD	HABITAT AND DISTRIBUTION NOTES	POTENTIAL FOR OCCURRENCE (PRE- SURVEY) ²
<i>Saltugilia latimeri</i> Latimer's woodland-gilia Polemoniaceae, annual herb	-/-	G3	S3	1B.2 E	March-June	400-1900 m. Rocky or sandy soil on steep slopes, often granitic, sometimes limestone. Chaparral, Mojavean desert scrub, pinyon and juniper woodland. In the region, it's known to occur on steep slopes in canyons on east slope of the Sierra Nevada.	VERY LOW
CRPR 4							
<i>Allium atrorubens</i> var. <i>cristatum</i> Inyo onion Alliaceae, bulbiferous perennial	-/-	G4T4	S4	4.3 E	April-June	1200-2560 m. Sand or rock substrate. granitic. Joshua tree woodland, Mojavean scrub, pinyon and juniper woodland. Known from Owens Peak area.	NONE – species known from high desert mountainous areas
<i>Camissonia kernensis</i> ssp. <i>kernensis</i> Kern County evening-primrose Onagraceae, annual herb	-/-	G4T3	S3	4.3 E	March-May	790-2130 m. Sandy or gravelly, granitic. Chaparral, Joshua tree woodland, pinyon and juniper woodland. Known to occur in Freeman Canyon.	LOW
<i>Canbya candida</i> white pygmy-poppy Papaveraceae, annual herb	-/-	G3G4	S3S4	4.2 E	March-June	600-1460 m. Gravelly, sandy, granitic. Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodland. Known to occur in the Southern Sierra Nevada foothills.	LOW
<i>Cordylanthus eremicus</i> ssp. <i>eremicus</i> Desert bird's-beak Orobanchaceae, perennial herb (hemiparasitic)	-/-	G3T3	S3	4.3 E	April-June	300-2500 m. Joshua tree woodland, pinyon and juniper woodland. Known to occur in the Southern Sierra Nevada foothills.	NONE – Project site has no woodlands
<i>Cordylanthus rigidus</i> ssp. <i>brevibracteatus</i> Short-bracted bird's-beak Orobanchaceae, perennial herb (hemiparasitic)	-/-	G5/T3	S3	4.3 E	July-August	610-2590 m. Openings in habitat on granite. Chaparral, lower montane coniferous forest, pinyon and juniper woodland, upper montane coniferous woodland. Occurs east of Owens Peak summit.	NONE – Project site has no habitat for this species
<i>Dudleya abramsii</i> ssp. <i>calcicola</i> limestone dudleya Crassulaceae, perennial herb	-/-	G4T4	S4	4.3 E	April-August	500-2600 m. Strictly on carbonate. Chaparral, pinyon and juniper woodland. On carbonate in the Sierra Nevada	NONE – Project site has no habitat for this species
<i>Eriogonum breidlovei</i> var. <i>shevockii</i> Needles buckwheat Polygonaceae, annual herb	-/-	G3T3	S3	4.3 E	July- September	1615-2575 m. Granitic rock outcrops; in granitic crevices and ledges on small domes. Pinyon and juniper woodland, Upper montane coniferous forest.	NONE – Project site has no habitat for this species

SCIENTIFIC NAME COMMON NAME PLANT FAMILY, LIFE FORM	FEDERAL/ STATE	RANK OR STATUS ¹			FLOWERING PERIOD	HABITAT AND DISTRIBUTION NOTES	POTENTIAL FOR OCCURRENCE (PRE- SURVEY) ²
<i>Euphorbia vallis-mortae</i> Death Valley sandmat Euphorbiaceae, perennial herb	-/-	G3	S3	4.2 E	May-October	230-1460 m. Sandy, gravelly. Mojavean desert scrub. Known to occur in the Southern Sierra Nevada foothills.	LOW
<i>Fritillaria pinetorum</i> Pine fritillary Liliaceae, cormous perennial	-/-	G4	S4	4.3 E	May-June	1735-3300 m. Granitic and metamorphic substrate. Chaparral, lower coniferous forest, pinyon and juniper woodland, subalpine coniferous forest, upper montane coniferous forest. Known to occur near Owens Peak.	NONE – Project site has no habitat for this species
<i>Gilia interior</i> Inland gilia Polemoniaceae, annual herb	-/-	G4	S4	4.3 E	March-May	700-1700 m. Rocky. Cismontane woodland, Joshua tree woodland, lower montane coniferous forest. Known to occur in the Southern Sierra Nevada.	NONE – Project site is not rocky
<i>Muilla coronata</i> crowned muilla Themidaceae, perennial bulbiferous herb	-/-	G3	S3	4.2	March-April	670-1960 m. Clay, sand, gravel. Chenopod scrub, Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodland. Known from the Southern Sierra Nevada foothills.	LOW
<i>Sclerocactus polyancistrus</i> Mojave fish-hook cactus Cactaceae, perennial stem succulent	-/-	G3	S3	4.2	April-July	640-2320 m. Usually carbonate. Great Basin scrub, Joshua tree woodland, Mojavean desert scrub. Known to occur south of Inyokern in the El Paso Mountains.	VERY LOW

Source: California Natural Diversity Database (CNDDB) reports (CNNDDB 2026a, 2026b); rank or status data checked in California Native Plant Society (CNPS 2026).

¹ Rank or status abbreviations:

FWS (U.S. Fish and Wildlife Service) listings under the Endangered Species: E=Endangered; T=Threatened; – = not listed or proposed for listing (FWS 2026).

CDFW (California Department of Fish and Wildlife) listings under California Endangered Species Act: E=Endangered; T=Threatened; R=Rare; CE= Candidate for Listing as Endangered;

CT=Candidate for Listing as Threatened; – = not listed or proposed for listing (CDFW 2026d).

G-Ranks (Global Ranks): G1=critically imperiled; G2=imperiled; G3=vulnerable; G4=apparently secure; G5=secure. Uncertainty about the rank of an element is expressed in two major ways: 1) by expressing the rank as a range of values: e.g., G2G3 means the rank is somewhere between G2 and G3; and 2) by adding a “?” to the rank: e.g., G2?. This represents more certainty than G2G3, but less than G2; a T code is the rank for subspecies (CDFW 2026c, CNPS 2026).

CNDDB (California Natural Diversity Database) S-Ranks: S1= extremely endangered; S2= endangered; S3= restricted range, rare; S4= apparently secure; S5= demonstrably secure. Uncertainty about the rank of an element is expressed in two major ways: 1) by expressing the rank as a range of values: e.g., S2S3 means the rank is somewhere between S2 and S3; and 2) by adding a “?” to the rank: e.g., S2?. This represents more certainty than S2S3, but less than S2 (CDFW 2026c, CNPS 2026).

CRPR (California Rare Plant Rank): 1A=plants presumed extinct in California; 1B=plants rare and endangered in California and elsewhere; 2A=plants presumed extirpated in California but common elsewhere; 2B=plants rare, threatened, or endangered in California but more common elsewhere; 3=plants about which more information is needed – a review list; and 4=plants of limited distribution – a watch list. The number following Rank is the Threat Code: .1=seriously endangered in CA; .2=fairly endangered in CA; .3=not very endangered in CA. Plants with an “E” are endemic to CA (CNPS 2026).

² Potential of Occurrence is based solely on the database search and literature review, not on the results of the current survey.

REFERENCE SITES

Reference sites were visited for the Mojave tarplant and the Death Valley sandmat. It was not necessary to visit reference sites for western Joshua tree or Mojave fish-hook cactus since these two plants are obvious and above ground year-round. Table 2 summarizes the reference site visits. It was determined that Mojave tarplant and Death Valley sandmat would be detectable during the survey.

Table 2. Summary of Reference Rare Plant Population Visits

CNDDB Occurrence #	Species	General Location	Date of Visit	Observations
34	<i>Deinandra mohavensis</i>	Short Canyon (trail access)	7/6/2026	About 1000 plants observed. 2% in flower, 5% in bud, rest in vegetative stage. In and around seeps, springs, and moist washes.
66	<i>Deinandra mohavensis</i>	Short Canyon (mouth)	7/6/2026	Twelve plants observed. One in bud, 11 were in vegetative stage. In sandy wash among boulders.
-	<i>Euphorbia vallis-mortae</i>	Short Canyon (mouth)	7/6/2026	About 40 plants observed. 100% were in flower. On sandy bank above main wash.

Photographs of Mojave tarplant and Death Valley sandmat taken on July 6, 2026 during reference site visits appear in Appendix A.

RARE PLANT SURVEY

NATURAL COMMUNITIES

Floristically, the Project Site is within the Mojave Desert Region of the Desert Floristic Province (Baldwin et al. 2012). Native vegetation on-site was typical of that found throughout the Mojave Desert. Two shrubland alliances were identified in the Botanical Survey Area and included *Larrea tridentata* - *Ambrosia dumosa* Shrubland Alliance (Creosote Bush - White Bursage Scrub) and *Atriplex polycarpa* Shrubland Alliance (Allscale Scrub), as defined by Sawyer et al. (2009). Both of these natural communities are not sensitive (CDFW 2026a).

Creosote bush - white bursage scrub commonly occurs on well-drained alluvial or colluvial soils, with or without a desert pavement surface, in minor washes and rills and on alluvial fans, bajadas, and upland slopes throughout the Mojave Desert, from below sea level to 1,200 m in elevation (Sawyer et al. 2009). This alliance occurred throughout the Botanical Survey Area and in adjacent areas. Other shrubs species in the creosote bush – white bursage scrub were infrequent and included goldenhead (*Acamptopappus sphaerocephalus* var. *hirtellus*), cheesebush (*Ambrosia salsola*), Acton encelia (*Encelia actoni*), Cooper’s goldenbush (*Ericameria cooperi* var. *cooperi*), rubber rabbitbrush (*Ericameria nauseosa*), four-wing saltbush (*Atriplex canescens* var. *canescens*), spiny hopsage (*Grayia spinosa*), and box-thorn (*Lycium cooperi*).

Allscale scrub is typically found in washes and on playa lake beds and shores, dissected alluvial fans, rolling hills, terraces, and edges of large, low gradient washes at an elevation of -75 m to 1500 m. Soils may be carbonate-rich, alkaline, sandy, or sandy loam (Sawyer et al. 2009). In the Botanical Survey Area this natural community only occurs along either side of State Route 178 and around other urban developments. Other shrubs were few and included white bursage, cheesebush, and creosote bush. Allscale scrub likely replaced creosote bush – white bursage scrub in these areas because of the disturbances associated with development. It’s even possible that

allscale was introduced to the site in a seed mix if any restoration activities occurred post construction.

FLORA

Vascular plants identified during the survey in the Biological Survey Area totaled 71 taxa in 21 plant families and are listed in Appendix B. Most annual herbs recorded in the Botanical Survey Area were winter annuals, species that germinate in the winter and bloom in late winter through spring. As such, many were senescent by the time the survey was conducted. The most common annual species that were still identifiable were Fremont pincushion (*Chaenactis fremontii*), desert dandelion (*Malacothrix glabrata*), red-stemmed filaree (*Erodium cicutarium*), brittle spineflower (*Chorizanthe brevicornu* var. *brevicornu*), cheatgrass (*Bromus tectorum*), red brome (*Bromus rubens* ssp. *madritensis*) and Schismus (*Schismus* spp.). Thirteen species that were observed were non-native weeds, including the invasive Sahara mustard (*Brassica tournefortii*). The plant list (Appendix B) likely underestimates the number of species that actually occur in the Biological Survey Area due to the timing of the survey. Many more winter annual species that only bloom in the spring likely occur there.

RARE PLANTS

Besides CDNPA plants, discussed below, no special status plant species was observed during the survey. Therefore, Mohave tarplant, Joshua tree, Death Valley sandmat, and Mojave fishhook cactus do not occur in the Botanical Survey Area.

CDNPA PLANTS

Two CDNPA species was observed during the botanical and wildlife surveys. These species were silver cholla (*Cylindropuntia echinocarpa*) and honey mesquite (*Neltuma odorata*). A total of 50 individual chollas and one mesquite were recorded in the combined Botanical Survey Area and 50-m buffer areas (Figure 1 at the end of this report).

POTENTIAL FOR WINTER/SPRING-BLOOMING RARE PLANTS

Seven winter/spring-blooming species identified as having some potential to occur (Table 1) were evaluated based on plant communities, geomorphology, and soils that were found in the Botanical Survey Area during the current survey. The assessment for each species is provided below. None of these species were observed during the spring botanical survey in 2024 (QK 2026).

Barstow Woolly Sunflower (*Eriophyllum mohavense*)

The Barstow woolly sunflower is a CRPR 1B plant, which includes plants that are rare, threatened, or endangered in California and elsewhere. It is found in shrubless areas with fine gravelly, silty, sandy, or clay soils on level or sloping terrain, as well as in low-lying depressions/desert playas. It often grows where soil particles are “cemented” together forming a crust. It grows in creosote bush or saltbush scrub at elevations of 500-800 m AMSL. It occurs in a limited area that includes west-central San Bernardino County, eastern Kern County, and southwest Inyo County (CNDDB 2026b). In general, threats to this rare species include energy development, military activities, vehicles/road construction, and grazing (Baldwin et al. 2012, CNPS 2026). The Botanical Survey Area lacks shrubless areas and soil crusts. It is unlikely that the Barstow woolly sunflower occurs.

Pale-yellow Layia (*Layia heterotricha*)

The pale-yellow layia is a CRPR 1B plant. It occurs in alkaline or clay soils. There is an unverified occurrence record for this species 3 miles south of Freeman Junction or 8 miles southwest of the Project Site (CNDDDB 2026b). This species is threatened by agricultural conversion, grazing, invasive non-native plants, and vehicles and is also potentially threatened by road maintenance and wind energy development (CNPS 2026). Neither alkaline nor clay soils were noted in the Botanical Survey Area; therefore, this species is unlikely to occur.

Charlotte's Phacelia (*Phacelia nashiana*)

Charlotte's phacelia is a CRPR 1B plant. Charlotte's phacelia prefers sandy to rocky soils on steep slopes and flats, usually in Joshua tree or pinyon-juniper woodland. It is found in the Coso Mountains, the El Paso Mountains, and the east slopes of the southern Sierra Nevada on the western edge of the Mojave Desert (CNDDDB 2026b). The closest known occurrence to the Project Site is approximately 5 miles away on a steep slope north of Indian Wells Canyon on the east slope of the Sierra Nevada. Threats to this plant include grazing, mining, off-highway vehicles (OHV), off-trail hikers (some populations are alongside the Pacific Crest Trail), and invasive roadside/trailside non-native plants (CNPS 2026). Because the Project Site and associated facilities have no steep slopes or sandy to rocky washes, the Charlotte's phacelia is unlikely to occur.

Latimer's Woodland-gilia (*Saltugilia latimeri*)

Latimer's woodland-gilia is a CRPR 1B plant. It inhabits dry desert slopes that have coarse sandy to rocky soil (Jepson Flora Project 2026). It occurs 5 miles west of the Project Site on very loose gravelly soil on steep slopes above Indian Wells Canyon on the east slope of the Sierra Nevada (CNDDDB 2026b). Due to the absence of sloping terrain on the Project Site, it has no potential for occurrence.

Kern County Evening-primrose (*Camissonia kernensis* ssp. *kernensis*)

The Kern County evening-primrose is a CRPR 4 plant that includes plants of limited distribution. It grows in sandy or gravelly granitic soils at an elevation ranging from 790 m to 2,130 m AMSL, a little higher than the Project Site. In the vicinity of the Project, it is known to occur on the east slope of the Southern Sierra Nevada (Freeman Canyon and Short Canyon) and the El Paso Mountains (Jepson Flora Project). Due to the presence of sandy soils on the Project Site, it has some potential for occurrence.

White Pygmy-Poppy (*Canbya candida*)

The white pygmy-poppy is a CRPR 4 plant. It grows on sandy soil from 600 to 1,460 m elevation AMSL in creosote-bush scrub, saltbush scrub, Joshua tree woodland, and pinyon-juniper woodland. It tends to be encountered in sandy wash areas where the mountains reach the desert floor. The nearest known populations to the Project Site are in Freeman Canyon and at the north end of Brown Road (Jepson Flora Project 2026). Although it is not considered threatened at this time, it has been placed on the CNPS "watch list" because of its tiny size and limited range. This poppy could be affected in the future by urbanization and invasive non-native plant species (Baldwin et al. 2012, CNPS 2026). Due to the presence of sandy soils throughout the Project area, it has a moderate potential for occurrence.

Crowned Muilla (*Muilla coronata*)

Crowned muilla is a CRPR 4 plant. It occurs in clay, sand, and gravel in open desert scrub and woodland from 670-1,960 m in elevation AMSL. It occupies scattered locations throughout the Mojave Desert including areas north of Inyokern along Brown Road (R. Woodard, Independent Biologist, personal communication) and east slope canyons of the Southern Sierra Nevada, such as Short Canyon and Indian Wells Canyon (Jepson Flora Project 2026). It has a moderate potential for occurrence throughout the Project Site based on the presence of appropriate soil types and proximity to known locations along Brown Road.

DISCUSSION AND RECOMMENDATIONS

A protocol-level summer rare plant survey was conducted in July 2026 to determine if any special status plant species that flower in the summer through fall months occur in the RB Inyokern Data Center project area. The only special status species observed and mapped were silver cholla and honey mesquite, both CDNPA species. Individuals were recorded on the Project Site, along linear features, and in buffer areas. Individuals of these species may not be harvested except under a permit issued by the Kern County agricultural commissioner or sheriff as per the California Food and Agricultural Code, Section 80071-80075. Since there might be some flexibility in the alignment of linear features, avoidance of CDNPA species may be possible and is recommended in these areas.

While winter/spring-blooming Kern County evening-primrose, white pygmy-poppy, and crowned muilla were deemed to have potential to occur in the project area during the current survey, none of them were observed during the 2024 spring rare plant survey (QK 2026). Spring 2024 had a super-bloom event, so those three species likely would have been detected during the time of the spring rare plant survey, if they indeed occurred on-site.

This survey satisfies the protocol requirements of surveying for special status plant species that would only be detectable during the summer/fall blooming period.

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APPENDIX A
Photographs

Mojave Tarplant, Short Canyon, Kern County – July 6, 2022



Death Valley Sandmat, Short Canyon, Kern County – July 6, 2026



APPENDIX B

Plant List

FAMILY / SCIENTIFIC NAME	COMMON NAME	HABIT
EUDICOT FLOWERING PLANTS		
ASTERACEAE	SUNFLOWER FAMILY	
<i>Acamptopappus sphaerocephalus</i> var. <i>hirtellus</i>	goldenhead	shrub
<i>Ambrosia acanthicarpa</i>	annual bur-sage	annual herb
<i>Ambrosia dumosa</i>	burro bush	shrub
<i>Ambrosia salsola</i>	cheesebush	shrub
<i>Chaenactis fremontii</i>	Fremont pincushion	annual herb
<i>Encelia actoni</i>	Acton encelia	shrub
<i>Ericameria cooperi</i> var. <i>cooperi</i>	Cooper's goldenbush	shrub
<i>Ericameria nauseosa</i>	rubber rabbitbrush	shrub
<i>Erigeron canadensis</i>	horseweed	annual herb
<i>Lasthenia gracilis</i>	common goldfields	annual herb
<i>Malacothrix glabrata</i>	desert dandelion	annual herb
<i>Matricaria discoidea</i>	pineapple weed	annual herb
<i>Sonchus oleraceus</i> ¹	common sow thistle	annual herb
<i>Stephanomeria exigua</i>	annual mitra	annual herb
<i>Stephanomeria pauciflora</i>	wire-lettuce	perennial herb/subshrub
<i>Stylocline</i> sp.	neststraw	annual herb
BORAGINACEAE	BORAGE FAMILY	
<i>Amsinckia tessellata</i> var. <i>tessellata</i>	desert fiddleneck	annual herb
<i>Cryptantha dumetorum</i>	scrambling cryptantha	annual herb
<i>Cryptantha nevadensis</i>	Nevada cryptantha	annual herb
<i>Eremocarya micrantha</i> var. <i>micrantha</i>	desert red-root	annual herb
<i>Johnstonella angustifolia</i>	narrow-leaved johnstonella	annual herb
<i>Pectocarya linearis</i> ssp. <i>ferocula</i>	narrow-toothed pectocarya	annual herb
<i>Plagiobothrys arizonicus</i>	Arizona popcornflower	annual herb
<i>Streptanthella longirostris</i>	streptanthella	annual herb
BRASSICACEAE	MUSTARD FAMILY	
<i>Brassica tournefortii</i> ¹	Sahara mustard	annual herb
<i>Caulanthus lasiophyllus</i>	California mustard	annual herb
<i>Lepidium lasiocarpum</i> ssp. <i>lasiocarpum</i>	modest peppergrass	annual herb
<i>Sisymbrium altissimum</i> ¹	tumble mustard	annual herb
<i>Sisymbrium orientale</i> ¹	oriental hedge mustard	annual herb
CACTACEAE	CACTUS FAMILY	
<i>Cylindropuntia echinocarpa</i> ²	silver cholla	perennial stem succulent
CHENOPODIACEAE	GOOSEFOOT FAMILY	
<i>Atriplex canescens</i> var. <i>canescens</i>	four-wing saltbush	shrub
<i>Atriplex polycarpa</i>	allscale	shrub
<i>Grayia spinosa</i>	spiny hope-sage	shrub
<i>Salsola tragus</i> ¹	Russian-thistle	annual herb
CONVOLVULACEAE	MORNING-GLORY FAMILY	
<i>Cuscuta denticulata</i>	small-tooth dodder	annual or perennial, holoparasitic herb
EHRETIACEAE	EHRETIA FAMILY	
<i>Tiquilia plicata</i>	fan-leaved tiquilia	perennial herb
EUPHORBIACEAE	SURGE FAMILY	
<i>Croton setiger</i>	doveweed, turkey-mullein	annual herb
<i>Euphorbia micromera</i>	Sonoran sandmat	annual herb
<i>Stillingia paucidentata</i>	Mojave stillingia	perennial herb
FABACEAE	LEGUME FAMILY	
<i>Astragalus lentiginosus</i>	freckled milkvetch	perennial herb

FAMILY / SCIENTIFIC NAME	COMMON NAME	HABIT
<i>Lupinus microcarpus</i> var. <i>horizontalis</i>	sunset lupine	annual herb
GERANIACEAE	GERANIUM FAMILY	
<i>Erodium cicutarium</i> ¹	red-stemmed filaree	annual herb
HYDROPHYLLACEAE	WATERLEAF FAMILY	
<i>Phacelia distans</i>	blue phacelia	annual herb
LAMIACEAE	MINT FAMILY	
<i>Salvia carduacea</i>	thistle sage	annual herb
LENNOACEAE	LENNOA FAMILY	
<i>Pholisma arenarium</i>	sand plant	perennial, parasitic herb
LOASACEAE	LOASA FAMILY	
<i>Mentzelia albicaulis</i>	white-stemmed stick-leaf	annual herb
ONAGRACEAE	EVENING PRIMROSE FAMILY	
<i>Chylismia claviformis</i>	brown-eyed evening-primrose	annual herb
<i>Eremothera boothii</i> ssp. <i>desertorum</i>	woody bottle-washer	annual herb
<i>Oenothera</i> sp.	evening-primrose	annual or perennial herb
POLEMONIACEAE	PHLOX FAMILY	
<i>Eriastrum eremicum</i> ssp. <i>eremicum</i>	desert woolly-star	annual herb
<i>Gilia</i> sp.	gilia	annual herb
<i>Loeseliastrum matthewsii</i>	desert calico	annual herb
POLYGONACEAE	BUCKWHEAT FAMILY	
<i>Chorizanthe brevicornu</i> var. <i>brevicornu</i>	brittle spineflower	annual herb
<i>Chorizanthe watsonii</i>	Watson's spineflower	annual herb
<i>Eriogonum fasciculatum</i>	California buckwheat	shrub
<i>Eriogonum gracillimum</i>	rose-and-white wild buckwheat	annual herb
<i>Eriogonum maculatum</i>	spotted wild buckwheat	annual herb
SOLANACEAE	NIGHTSHADE FAMILY	
<i>Datura wrightii</i>	jimson weed	perennial herb
<i>Lycium andersonii</i>	Anderson's wolfberry	shrub
<i>Lycium cooperi</i>	Cooper's wolfberry	shrub
ZYGOPHYLLACEAE	CALTROP FAMILY	
<i>Larrea tridentata</i>	creosote bush	shrub
MONOCOT FLOWERING PLANTS		
POACEAE	GRASS FAMILY	
<i>Bromus berteruanus</i> ¹	Chilean chess	annual grass
<i>Bromus rubens</i> ¹	red brome, foxtail chess	annual grass
<i>Bromus tectorum</i> ¹	cheatgrass	annual grass
<i>Cynodon dactylon</i> ¹	Bermuda grass	perennial grass
<i>Hordeum murinum</i> ¹	wall barley	annual grass
<i>Schismus arabicus</i> ¹	Arabian grass	annual grass
<i>Schismus barbatus</i> ¹	Mediterranean grass	annual grass
<i>Stipa hymenoides</i>	sand rice grass	perennial grass
<i>Stipa speciosa</i>	desert needlegrass	perennial grass
TYPHACEAE	CATTAIL FAMILY	
<i>Typha</i> sp.	cattail	perennial herb

¹ non-native weed² CDNPA species

