DOCKETED	
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4.4 BIOLOGICAL RESOURCES

This section evaluates potential effects on biological resources that may result from project implementation. This section is based on the Biological Resources Technical Report (BRTR), prepared by Great Ecology included in Appendix C. The BRTR describes the results of the survey conducted by Great Ecology and assesses the site's potential to support special-status species, sensitive biological communities such as wetlands or riparian habitats, and the potential presence of other sensitive biological resources protected by local, State, and federal laws and regulations. No arborist report was prepared for the VBGF as the site contains no trees.

4.4.1 CEQA Checklist

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Biological Resources				
Would the project:				
1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
3) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☐	☐	☒
5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	☐	☐	☐	☒

4.4.2 Environmental Setting

Since its founding in 1905, Vernon has served as an industrial hub in Southern California. Originally farmland, its proximity to Los Angeles and major rail lines facilitated rapid industrial development after the 1920s. The majority of the City is zoned as industrial and historically consisted of stockyards, meatpacking, and manufacturing. Over time, the industrial markets transitioned to specialized manufacturing, processing, and storage.

Vernon is located within the Los Angeles Basin, approximately 200 feet above sea level. The area is predominantly flat with little topographic complexity. The Los Angeles River

runs southeast through the City limits in a concrete flood control channel designed to divert stormwater and allow for urban drainage. The City is part of the Santa Ana Hydrologic Unit Code (HUC) 18070203.

Vernon experiences hot, dry summers and mild winters, typical of Southern California climatic conditions. Due to the highly urban landscape, the heat island effect makes it warmer than the surrounding areas. Average temperatures range from the high 60s °F to the high 80s °F throughout the year, with occasional heat waves exceeding 100°F. Rainfall is limited, averaging about 15 inches annually, primarily in winter and early spring

The Project Area sits on an empty, recently demolished industrial lot surrounded by heavy industrial and manufacturing facilities. The Project Area is bordered by ongoing construction to the south, a packing facility to the east, and vacant property to the north. The Los Angeles River is separated from the Project Area by vacant property and a concrete wall. The transmission line corridors are entirely located in an area of developed manufacturing and processing facilities. Throughout the Biological Survey Area (BSA), there are a few isolated, enclosed lots that have been heavily disturbed but are not currently developed. A high-voltage electrical transmission corridor runs north-south between S. Downy Rd and Alcoa Ave. The land under the transmission lines is either paved, bare ground, or invasive grasses and forbs that show signs of regular mowing.

4.4.3 Environmental Impact Discussion

4.4.3.1 Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service

As described in the BRTR Habitat modification will be limited to the Project Area including the transmission lines and parcels 6303-005-035 and 6303-005-036, which have been determined to contain only bare ground or existing industrial development. There will be no expected impacts on habitats in this area.

No sensitive habitat was identified within or near the BSA.

Therefore the Project will not result in significant direct or indirect impacts on any candidate, sensitive or special status species. **(No Impact)**

4.4.3.2 Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

As described in the BRTR, the segment of the Los Angeles River north of the Project Area is fully channelized and has no riparian buffer. No activities from the Project will occur within or alter the ordinary high-water mark or banks of the river. No impacts on the

Los Angeles River or its associated jurisdictional waters are expected as a result of Project activities. **(No Impact)**

4.4.3.3 Would the project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

As described in the BRTR, the project site does not support aquatic or wetland habitats or waters of the U.S. or State of California. **(No Impact)**

4.4.3.4 Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

As described in the BRTR, no wildlife corridors were identified near the BSA nor would the Project impact the movement of any native resident or migratory fish or wildlife species. The Los Angeles River represents the primary potential ecological feature for wildlife movement and will not be altered or impacted by Project development. **(No Impact)**

4.4.3.5 Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As described in the BRTR, there are no conflicting local policies or ordinances within the Project scope given Vernon's limited biological resources. **(No Impact**

4.4.3.6 Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

The proposed project does not lie within the boundaries of any adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur. **(No Impact)**

4.4.4 Mitigation Measures

No mitigation measures are necessary to ensure less than significant biological resource impacts.

4.4.5 Governmental Agencies

Because the site does not support or is not adjacent to wildlife habitat that would require any special wildlife agency permit.

APPENDIX C

Biological Evaluation Technical Report

Biological Resources Technical Report

Vernon Data Center

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March 6, 2025

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List of Acronyms and Abbreviations

APN	Assessor's Parcel Number
BGEPA	Bald and Golden Eagle Protection Act
BIOS	Biogeographic Information and Observation System
BSA	Biological Survey Area
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CWA	Clean Water Act
CWHR	California Wildlife Habitat Relationship
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FGC	Fish and Game Code
GEP	Goodman Energy Park
GIS	Geographic Information System
HCP	Habitat Conservation Plan
HUC	Hydrologic Unit Code
IPaC	Information for Planning and Consultation
MBTA	Migratory Bird Treaty Act
MW	Megawatt
NCCP	Natural Community Conservation Plan
NOAA	National Oceanic and Atmospheric Administration
NPPA	Native Plant Protection Act
NRCS	Natural Resource Conservation Service
NWI	National Wetlands Inventory
RWQCB	Regional Water Quality Control Board
SWRCB	State Water Resources Control Board
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
VBGF	Vernon Generating Backup Facility
VPU	Vernon Public Utilities
WOTUS	Waters of the United States

1.0 Introduction

This Biological Resources Technical Report summarizes the biological resources known or with the potential to occur at or near the Goodman Energy Park (GEP) Vernon Backup Generating Facility (VBGF) project (Project) located in Vernon, California, and evaluates the potential effects of the proposed development on sensitive biological resources. The report identifies sensitive habitats, special-status species, jurisdictional waters of the United States (WOTUS) and the State of California, and other ecological features that may be impacted by Project activities.

To assess these impacts, Great Ecology conducted a desktop assessment of existing environmental data and performed a reconnaissance-level ground survey to document conditions onsite and within a one-mile buffer of the proposed Project.

1.1 Project Description

GIC Vernon LLC is proposing the construction of a 99-megawatt (MW) GEP VBGF. This facility will include forty diesel-powered generators providing up to 99 MW of emergency backup generation to support the GEP Data Center. Along with the VGBF, GEP will incorporate:

- Two data center buildings;
- A project substation;
- A Vernon Public Utilities (VPU) substation and transmission lines;
- Site access and surface parking;
- Landscaping;
- Stormwater control and features;
- Water and sewer pipeline interconnections; and
- Improvements to the Right-of-Way at the project frontage.

Thirty-eight generators, each with a 3-MW capacity, will be dedicated to supporting critical data center operations during power outages. The remaining two generators, each with a 1-MW capacity, will be designed to maintain general office functions, building services, and safety systems for the data center buildings during

emergencies. These backup generators will be located in two generation yards adjacent to the two GEP data centers.

GEP will not have access to the VBGF, which will only be available when VPU is unable to meet electrical needs. The VBGF will not be connected to the electrical transmission grid but instead contain two generation yards, each electrically interconnected to the data center building.

1.2 Project Area

The proposed data center and VBGF development (Project Area) will occupy approximately 11.55 acres on a newly created parcel located north of E Vernon Avenue and east of Soto Street in the City of Vernon, California. The site currently consists of two parcels with Assessor's Parcel Numbers (APN) 6303-005-035 and 6303-005-036 that will be consolidated through a Lot Line Adjustment, which is currently under review by the County of Los Angeles. The Project aligns with existing zoning regulations, as the area is designated for industrial use. Figure 1 and Figure 2 show the regional vicinity and the location of the Project Area.

Figure 1. Regional Location

Figure 2. Site Vicinity

Vernon Data Center
Site 1-Mile Vicinity Map
NAD 1983 STATE PLANE (2011)
SOURCE(S): ESRI

1:20,000
N
Feet
0 1,000 2,000

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2.0 Regulatory Framework

This section provides an overview of federal, state, and local/regional regulations applicable to potential jurisdictional features present within the Project Area.

2.1 Federal Regulations

2.1.1 Endangered Species Act

The Endangered Species Act (ESA) is a federal law that allows for the conservation of species that are considered "endangered" or "threatened" throughout their range and the habitat on which they depend. Endangered refers to species in danger of extinction and threatened refers to species that are likely to become endangered (USFWS 1973). The U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) are responsible for implementing the ESA. These agencies regulate any action that results in the "take" of listed fish and wildlife species. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, capture, collect or attempt to engage in any such conduct" (LLI 2025). The ESA also governs the removal, possession, malicious damage, or destruction of listed plant species on federal land. Before approving a project, agencies must determine whether any federally listed species may be present in the Project Area and determine whether the proposed Project will have a significant effect on such species or its habitat.

2.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) is a federal law that protects migratory bird species. Administered by USFWS, this legislation prohibits the hunting, killing, capturing, trading, or disturbing of any protected bird species, including their eggs and nests unless expressly authorized by regulation or permit (50 CFE 13). The act was established as part of an international conservation treaty between the United States and several countries, including Canada, Mexico, Russia, and Japan. A comprehensive list of protected migratory bird species can be found in Title 50 Part 10.13 (USFWS 2020).

2.1.3 Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act was enacted to conserve and protect bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*). The act prohibits the take, possession, sale, purchase, barter, offer to sell, transport, export, or import of any bald or golden eagle, alive or dead, including any part, nest, or egg, unless allowed by permit (15 U.S.C. 668[a]; 50 CFR 22). USFWS is responsible for regulating activities that may result in the take of bald or golden eagles, defined as "pursuing, shooting, shooting at, poisoning, wounding, killing, capturing, trapping, collecting, molesting, and disturbing" bald or golden eagles, and as activities causing: "(1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior" (USFWS 2007a).

2.1.4 Clean Water Act Section 404

The main purpose of the Clean Water Act (CWA) is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters," as written in the CWA section 101(a) (USEPA 2013). Under this act, USACE enforces regulations on discharged pollutants from industrial and municipal entities. This includes preventing water pollution, obtaining discharge permits, meeting water quality standards, and developing risk management plans.

2.1.4.1 Waters of the United States

The Environmental Protection Agency (EPA) and the United States Army Corps of Engineers (USACE) published the Navigable Waters Protection Rule to define WOTUS in the Federal Register. However, following the Supreme Court's decision in *Sackett v. EPA* (2023), the definition of WOTUS has been significantly narrowed. Under the current interpretation, the following waters are federally regulated under the CWA:

- Territorial seas and traditional navigable waters;
- Relatively permanent, standing, or continuously flowing bodies of water connected to traditional navigable waters; and

- Wetlands that have a continuous surface connection to those relatively permanent waters, making it difficult to determine where the water ends and the wetland begins.

The *Sackett* decision eliminated the "significant nexus" test, which previously allowed for the regulation of wetlands and tributaries that significantly affect the chemical, physical, or biological integrity of traditional navigable waters. As a result, many wetlands and ephemeral or intermittent streams that were previously regulated under the CWA may no longer fall under federal jurisdiction.

The final rule also details categories of exclusions, which remain largely consistent with the 2020 rule, including:

- Ephemeral features (i.e., features that only contain water in direct response to rainfall);
- Groundwater;
- Many ditches;
- Prior converted cropland; and
- Waste treatment systems.

2.1.5 Clean Water Act Section 401

Section 401 of the CWA requires that any activities involving a discharge to WOTUS shall provide the federal permitting agency a certification from the Project's state indicating that the discharge will comply with the applicable CWA provisions. In California, applicants must receive a Section 401 water quality certification or waiver from the applicable water board (State or Regional) prior to the issuance of a Section 404 permit.

2.2 State Regulations

2.2.1 California Endangered Species Act

The California Endangered Species Act (CESA) protects native species, including those not federally listed, along with their vital habitats (CDFW 2025a). Like the ESA, its

purpose is to conserve species designated as “endangered” or “threatened.” The California Department of Fish and Wildlife (CDFW) is responsible for designating these species and collaborates with stakeholders to preserve them. CESA prohibits the “take” of any species listed by CDFW, with “take” defined similarly to ESA as harassing, harming, or killing.

2.2.2 California Fish and Game Code

2.2.2.1 Fully Protected Designations

California Fish and Game Code (FGC) Sections 3511, 4700, 5050, and 5515 designate 36 fish and wildlife species as fully protected from take, including hunting, harvesting, and other activities. The FGC sections dealing with fully protected species state that these species “…may not be taken or possessed at any time and no provisions of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected species.”

2.2.2.2 Lake and Streambed Alteration

Section 1600 of the California FGC requires that a lake and streambed alteration application be submitted to CDFW for “any activity that may substantially divert or obstruct the natural flows or substantially change the bed, channel, or bank of any river, stream, or lake.” CDFW reviews the proposed actions and, if necessary, submits to the applicant a proposal for measures to protect affected fish and wildlife resources.

2.2.2.3 Native Plant Protections

Section 1900 of the California FGC, also known as the Native Plant Protection Act, was enacted to empower the CDFW to designate and protect native plant species as rare or endangered (CDFW 2025b). A species is classified as endangered if it is in immediate jeopardy, while a species is classified as rare if it has a limited population within its range and is likely to become endangered.

2.2.2.4 Native Bird Protections

The California FGC includes provisions to protect birds from unlawful activities such as take, harm, or possession. Section 3503 and 3503.3 prohibits the destruction or possession of any bird's nest or eggs unless permitted by law, while Section 3513 enforces the MBTA, making it illegal to capture or possess migratory nongame birds without authorization.

2.2.3 California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires state and local agencies to identify and disclose the environmental impacts of a proposed project location. Once these impacts are identified, agencies must implement appropriate mitigation measures whenever possible. Additionally, they must explore feasible project alternatives that minimize environmental harm while still achieving project objectives (CDPJ 2025).

2.2.4 Porter-Cologne Water Quality Control Act

The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) have jurisdiction over all surface water and groundwater in California, including wetlands, headwaters, and riparian areas (California Water Code Division 7), and regulate any activity that discharges waste that could affect the quality of waters of the state. The SWRCB or applicable RWQCB issues waste discharge requirements for any project with waste discharge that impacts a water of the state.

2.2.5 California Wildlife Protection Act

The California Wildlife Protection Act establishes regulatory requirements to enhance wildlife connectivity and habitat resilience. The act requires CDFW to identify and map priority wildlife corridors and habitat areas that facilitate species movements and adaptation to climate change. Projects that could impact designated wildlife corridors must avoid or minimize harm to these areas. If impacts are unavoidable, mitigation measures, such as habitat restoration or the creation of wildlife crossings, must be implemented.

2.3 Local Regulations

2.3.1 City of Vernon General Plan

The resources element of Vernon's General Plan outlines policies for managing water, air quality, energy, and open space, but since this is a highly developed area, most natural resources management requirements pertain to the air and groundwater supply. The city relies on groundwater and recycled water, with demand expected to reach 13,800 acre-feet per year by 2025 (City of Vernon 2025). Conservation efforts focus on water recycling and quality regulations to prevent contamination and depletion of this resource. Air quality measures include strict South Coast Air Quality Management District regulations, promotion of alternative fuel vehicles, and ride-sharing programs to reduce emissions. Vernon's municipal power plant ensures reliable energy with conservation efforts to reduce costs and emissions.

2.3.2 Los Angeles County General Plan

The Los Angeles County General Plan 2035 highlights policies and guidelines for the development and conservation of areas in the county up to the year 2035. This plan contains a conservation and natural resources element, which outlines policies for the protection of biological resources, water conservation, air quality, and sustainable management of other resources (LACP 2025). New development projects are required to avoid or minimize impacts on critical habitats and natural resources including wetlands, riparian areas, and wildlife corridors.

2.3.3 Los Angeles River Master Plan

The Los Angeles River Master Plan is a comprehensive framework designed to revitalize all 51 miles of the river across Los Angeles County. Its key goals include enhancing flood control, expanding recreational opportunities, and restoring natural habitats. In Vernon, the river runs along the edge of the city, currently serving as a concrete-lined flood control channel. However, the Master Plan proposes adding greenways and trails, improving accessibility, and integrating more environmental and community-friendly spaces into the area (LACPW 2025).

3.0 Methodology

This section outlines the methodology for identifying present and historical biological resources in the Project Area.

3.1 Desktop Evaluation

Great Ecology began by evaluating online databases to identify sensitive biological resources within and in the vicinity of the Project Area.

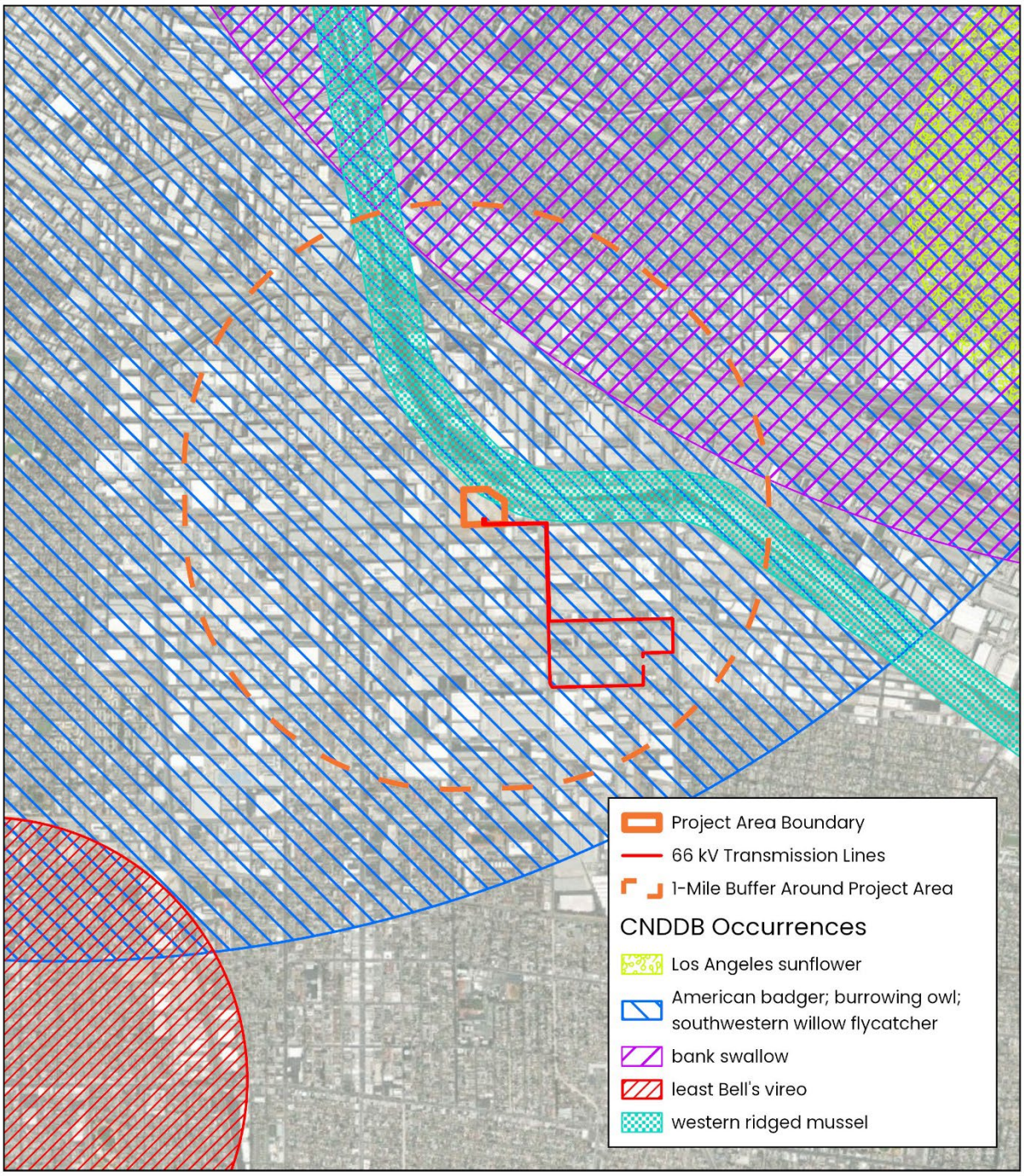
The search was conducted on February 19, 2025 using the following:

- USFWS National Wetlands Inventory (NWI) Wetlands Mapper;
- Los Angeles County Enterprise Geographic Information System (GIS) Hub/Dudek;
- CDFW California Natural Diversity Database (CNDDB) Biogeographic Information and Observation System (BIOS) Viewer;
- USFWS Information for Planning and Consultation (IPaC);
- California Native Plant Society (CNPS) Rare Plant Inventory species list;
- California Wildlife Habitat Relationship (CWHR) System;
- USFWS Threatened & Endangered Species Active Critical Habitat Report;
- United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) Web Soil Survey and National Hydric Soil List; and
- Google Earth Aerials.

The CNDDB query included a 10-mile radius from the proposed Project Area. The CNPS Rare Plant Inventory query included the Los Angeles quad (3411812) where the Project is located plus the eight surrounding quads including El Monte (3411811), Mt. Wilson (3411821), Burbank (3411823), Pasadena (3411822), South Gate (3311882), Inglewood (3311883), Whittier (3311881), and Hollywood (3411813). A review of historical aerial imagery shows that the Project Area was a developed industrial meat processing facility for over 100 years until it was demolished in 2023. As a result of the historical property use and the high density of industrial development in the surrounding area, it is unlikely that rare plants or wildlife have the potential to occur within the Project Area. The results of the CNDDB and IPaC queries are located in

Appendix C and Appendix D, respectively. Figure 3 displays the occurrences of CNDDB species within a one-mile buffer of the Project Area.

Figure 3. CNDDB Occurrences



3.2 Field Survey

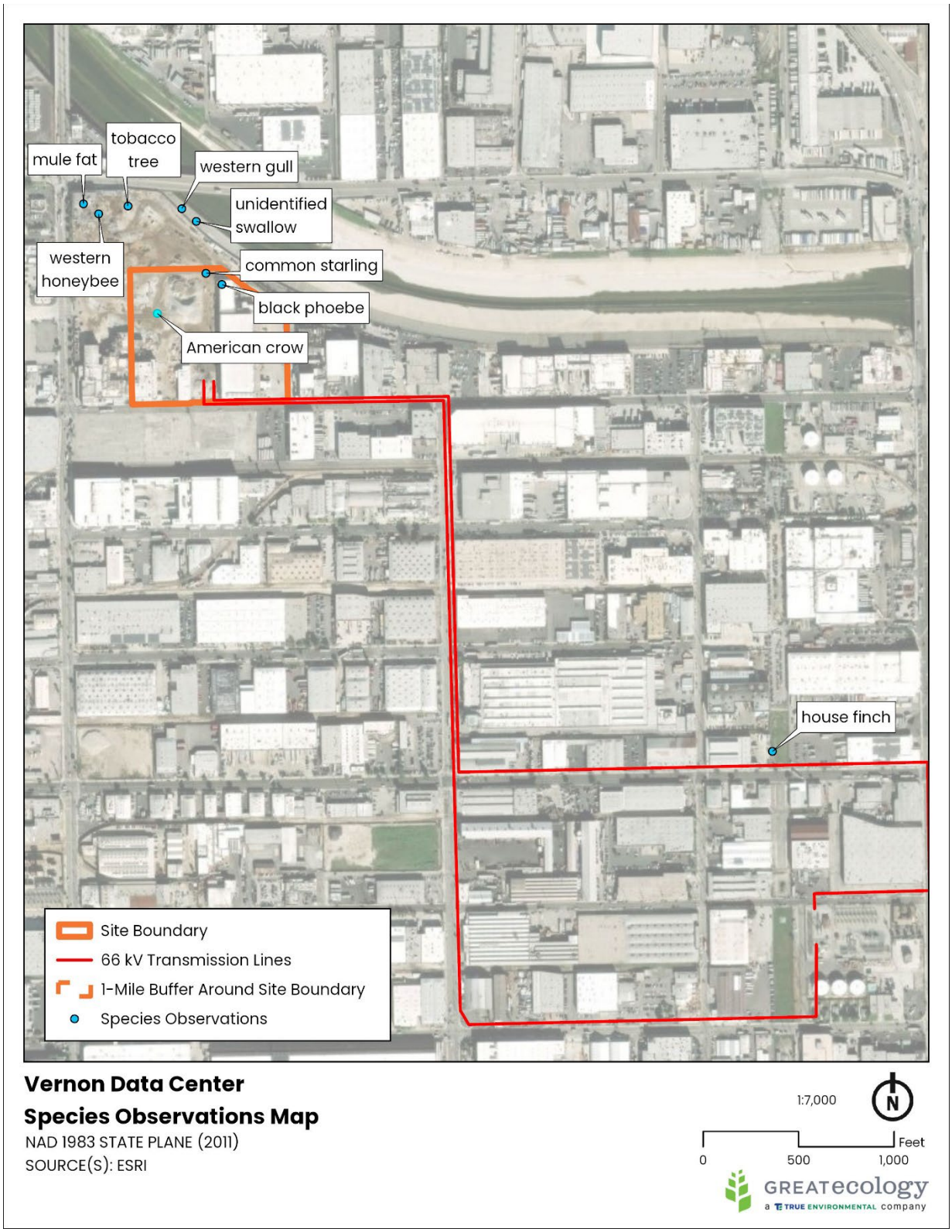
A reconnaissance-level field survey was conducted on February 27, 2025. The survey focused on characterizing the conditions of the Project Area and surroundings, assessing the potential for the Project Area to support special status species, and identifying any special status plant or wildlife species and jurisdictional waters that may be impacted by the Project. The field survey began at approximately 9:00 am and ended at approximately 11:30 am. The field survey was conducted within a one-mile buffer around the two parcels proposed for development and a 1000-foot buffer around the transmission lines (fully contained within the larger 1-mile buffer) called the Biological Survey Area (BSA). The field survey started at the southeast corner of the Project Area and proceeded across the entire lot. Adjacent lands where physical access was not possible (adjacent private properties and the Los Angeles River channel) were surveyed using binoculars. The remainder of the survey was carried out by walking and driving the transmission line corridors and streets throughout the buffer area.

The Project Area is currently a construction site and is still in the process of demolition cleanup from its previous use. Once demolition cleanup is complete, the Project Area will be used as a temporary laydown yard for the development of a parcel south of the property. Representative site photos are presented in Appendix A. During the field survey, all plant and wildlife species observed were recorded in field notes and are listed in Table 1. Figure 4 identifies the approximate locations of observed species.

Table 1. Field Observation Table

Scientific Name	Common Name	Taxon Group
Apis mellifera	western honeybee	Insect
Baccharis salicifolia	mule fat	Plant
Nicotiana glauca	tobacco tree	Plant
Corvus brachyrhynchos	American crow	Bird
Haemorhous mexicanus	house finch	Bird
Hirundinidae sp.	swallow, unidentified	Bird
Larus occidentalis	western gull	Bird
Sayornis nigricans	black phoebe	Bird
Sturnus vulgaris	common starling	Bird

Figure 4. Species Observations



4.0 Biological Setting

4.1 Vegetation Communities

Vernon is centrally located within the County of Los Angeles, California. The California Wildlife Habitat Relationships (CWHR) System was used to find predicted vegetation communities within a 10-mile radius of the Project Area (Appendix B). However, Vernon is primarily composed of industrial development, and the only vegetation communities identified within the BSA are Urban and Barren (Table 2). The Project is not expected to significantly impact either of these habitats.

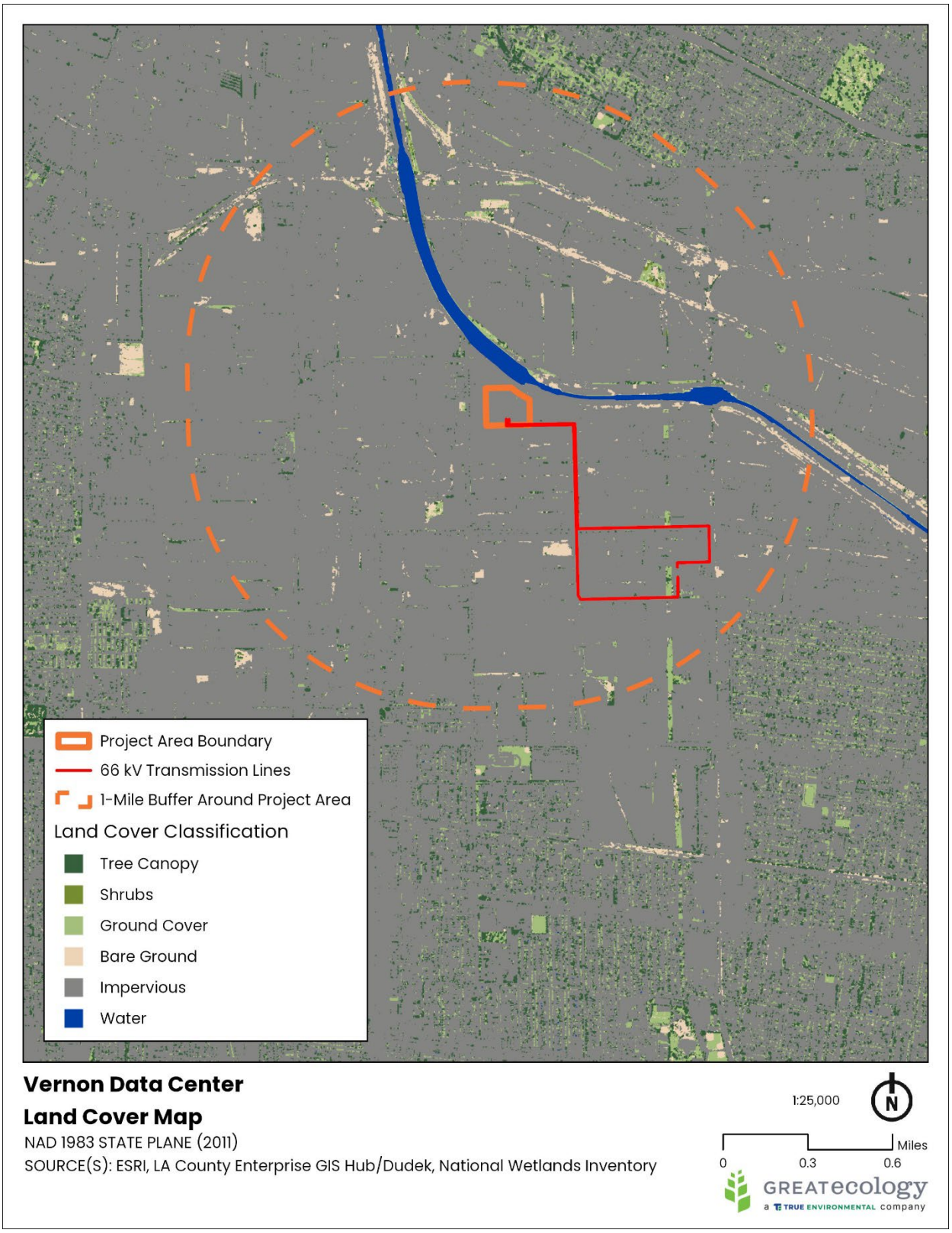
Table 2. CWHR Habitat Types Identified in the Field Survey

Habitat	Primary Species	Scientific Names
Urban	Grass Lawns	*Lolium perenne* / *Poa pratensis*
	Ornamental Trees	Various species
	Hedges	Various species
Barren	Rock	N/A
	Gravel	N/A
	Soil	N/A

The desktop review and field survey revealed minimal vegetation in or near the Project Area. Historical records show that the Project Area primarily served as agricultural land prior to the 20th century. Extensive industrialization over the past 100 years has eliminated virtually all natural habitat within the Project Area and its surroundings. The BSA is predominantly covered by impervious surfaces, while the remaining undeveloped lots are highly disturbed and lack native habitat. All observed plant species were identified in the field, with most vegetation consisting of ornamental landscaping or non-native trees.

Figure 5 displays the land and vegetation cover within the Project Area and its surroundings as of 2020.

Figure 5. Land & Vegetation Cover Classification



4.1.1 Sensitive Vegetation Communities

No sensitive vegetation communities were identified during the desktop review or field survey. The BSA contains predominantly impervious surfaces and bare ground.

4.2 Special-Status Species

A list of potential special-status species within a 10-mile radius of the Project Area was compiled through desktop review. Each special-status species has been evaluated based on its likelihood of occurrence within the BSA (Table 3). The following criteria define the potential for these species to be present:

- **Present:** The species was observed within the BSA during field surveys.
- **High Likelihood:** Although the species was not observed during past field surveys, the presence of high-quality habitat combined with nearby CNDDB records or other documented occurrences suggests a strong chance of occurrence within the BSA.
- **Moderate Likelihood:** Suitable habitat exists within the BSA, and CNDDB records or other documented occurrences in the region indicate a reasonable chance of the species being present.
- **Low Likelihood:** The BSA contains only marginally suitable habitat, with few documented occurrences in the vicinity and no detections during surveys, making the species unlikely to be present.
- **Presumed Absent:** The species was not detected during surveys, lacks suitable habitat in the BSA, or is outside its known range.
- **Extirpated:** The species has not been detected and is considered extirpated according to CNDDB.

Table 3. Species Status with Potential to Occur

Scientific Name	Common Name	Federal Status	State Status	Species of Special Concern	Potential to Occur Within BSA
Amphibians					
Spea hammondii	western spadefoot	Proposed Threatened	None	Yes	**Low likelihood:** Very minimal habitat in the region; last observed in 1921.
Birds					
Agelaius tricolor	tricolored blackbird	None	Threatened	Yes	**Presumed Absent:** No suitable habitat within survey area, last observed in 1940.
Athene cunicularia	burrowing owl	None	Candidate	Yes	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area; last observed in 1895.
Buteo swainsoni	Swainson's hawk	None	Threatened	No	**Presumed Absent:** No suitable habitat within survey area; last observed in 1880.
Coccyzus americanus occidentalis	western yellow-billed cuckoo	Threatened	Endangered	No	**Extirpated:** No suitable habitat within survey area; last observed in 1910.
Coturnicops noveboracensis	yellow rail	None	None	Yes	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area; last observed in 1952.
Empidonax traillii extimus	southwestern willow flycatcher	Endangered	Endangered	No	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area; last observed in 1894.
Icteria virens	yellow-breasted chat	None	None	Yes	**Low likelihood:** Very minimal habitat in the region; last observed in 2017.
Polioptila californica californica	coastal California gnatcatcher	Threatened	None	Yes	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area; last observed in 2018.
Riparia riparia	bank swallow	None	Threatened	No	**Extirpated:** No suitable habitat within survey area; last observed in 1894.

Scientific Name	Common Name	Federal Status	State Status	Species of Special Concern	Potential to Occur Within BSA
Vireo bellii pusillus	least Bell's vireo	Endangered	Endangered	No	**Presumed Absent:** No suitable habitat within survey area; last observed in 1913.
Dicots					
Arenaria paludicola	marsh sandwort	Endangered	Endangered	No	**Extirpated:** No suitable habitat within survey area; last observed in 1900.
Astragalus tener var. *titi*	coastal dunes milkvetch	Endangered	Endangered	No	**Presumed Absent:** No suitable habitat within survey area; last observed in 1903.
Berberis nevinii	Nevin's barberry	Endangered	Endangered	No	**Low likelihood:** Very minimal habitat in the region; last observed in 2010.
Chloropyron maritimum ssp. *maritimum*	saltmarsh bird's-beak	Endangered	Endangered	No	**Presumed Absent:** No suitable habitat within survey area; last observed in 1901.
Dodecahema leptoceras	slender-horned spineflower	Endangered	Endangered	No	**Presumed Absent:** No suitable habitat within survey area; last observed date unknown.
Eryngium aristulatum var. *parishii*	San Diego button-celery	Endangered	Endangered	No	**Extirpated:** No suitable habitat within survey area; last observed in 1901.
Nasturtium gambelii	Gambel's water cress	Endangered	Threatened	No	**Extirpated:** No suitable habitat within survey area; last observed in 1904.
Navarretia fossalis	spreading navarretia	Threatened	None	No	**Extirpated:** No suitable habitat within survey area; last observed in 1906.
Insects					
Bombus crotchii	Crotch's bumble bee	None	Candidate	Yes	**Low likelihood:** Very minimal habitat in the region; No suitable habitat within the survey area; No burrow structures available.

Scientific Name	Common Name	Federal Status	State Status	Species of Special Concern	Potential to Occur Within BSA
Danaus plexippus	monarch butterfly	Proposed Threatened	None	Yes	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area.
Glaucopsyche lygdamus palosverdesensis	Palos Verdes blue butterfly	Endangered	None	No	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area; last observed in 2001.
Mammals					
Antrozous pallidus	pallid bat	None	None	Yes	**Low likelihood:** Very minimal habitat in the region; last observed in 1910.
Eumops perotis californicus	western mastiff bat	None	None	Yes	**Low likelihood:** Very minimal habitat in the region; last observed in 1941.
Lasiurus xanthinus	western yellow bat	None	None	Yes	**Presumed Absent:** Very minimal habitat in the region; last observed in 1984.
Microtus californicus stephensi	south coast marsh vole	None	None	Yes	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area; last observed in 1957.
Nyctinomops femorosaccus	pocketed free-tailed bat	None	None	Yes	**Low likelihood:** Very minimal habitat in the region; last observed in 1994.
Nyctinomops macrotis	big free-tailed bat	None	None	Yes	**Presumed Absent:** Very minimal habitat in the region; last observed in 1985.
Taxidea taxus	American badger	None	None	Yes	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area.
Monocots					
Orcuttia californica	California Orcutt grass	Endangered	Endangered	No	**Extirpated:** No suitable habitat within survey area; last observed in 1963.
Reptiles					

Scientific Name	Common Name	Federal Status	State Status	Species of Special Concern	Potential to Occur Within BSA
Actinemys pallida	southwestern pond turtle	Proposed Threatened	None	Yes	**Presumed Absent:** No suitable habitat within survey area, last observed in 1965.
Anniella stebbinsi	Southern California legless lizard	None	None	Yes	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area; last observed in 2021.
Arizona elegans occidentalis	California glossy snake	None	None	Yes	**Presumed Absent:** No suitable habitat within survey area; last observed in 1889.
Aspidoscelis tigris stejnegeri	coastal whiptail	None	None	Yes	**Presumed Absent:** Very minimal habitat in the region; No suitable habitat within survey area; last observed in 2000.
Phrynosoma blainvillii	coast horned lizard	None	None	Yes	**Presumed Absent:** No suitable habitat within survey area; last observed in 1954.
Thamnophis sirtalis pop. 1	south coast garter snake	None	None	Yes	**Extirpated:** No suitable habitat within survey area; last observed in 1937.

4.2.1 Special-Status Plants

Nine special-status plant species were identified within a 10-mile radius during desktop review. Of these, five are classified as "extirpated," meaning there is no viable habitat remaining in the area, and they are confidently considered absent. This assessment aligns with the CNDDB database observations that listed species as “extirpated.” Three are considered “possibly extirpated” by CNDDB and are presumed absent, and one species has low likelihood of presence. No special status plants were observed in the BSA.

4.2.2 Special-Status Wildlife

A total of twenty-seven special-status wildlife were identified through desktop review. All of these species are classified as extirpated, presumed absent, or having a low likelihood of occurrence within or near the survey area. No special status wildlife species were observed in the BSA.

4.3 Wildlife Habitat

4.3.1 Critical Habitat

Critical habitat is identified in the USFWS Threatened & Endangered Species Active Critical Habitat Report. Coastal California gnatcatcher *(Polioptila californica californica*) habitat is the only critical habitat identified within 10 miles of the Project. The BSA does not overlap with the critical habitat and does not contain any potential habitat for the species. The Project is not expected to impact coastal California gnatcatcher critical habitat.

4.3.2 Wildlife Movement and Nursery Sites

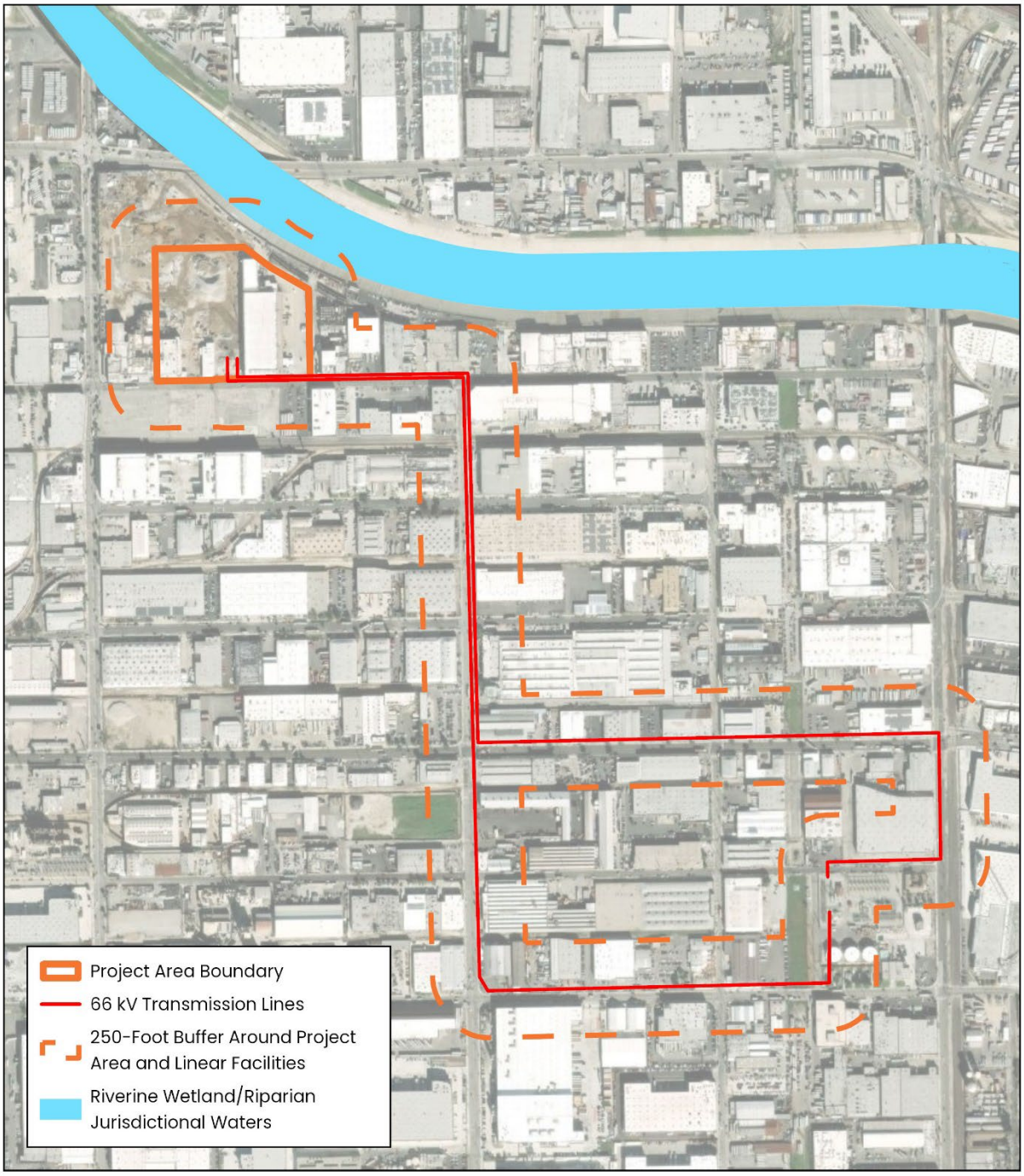
No designated wildlife corridors or nursery sites were identified within the BSA during the desktop review. Given Vernon’s highly urbanized landscape and the field survey findings, it is unlikely that established wildlife movement occurs within the City. The Los Angeles River, which is adjacent to the Project Area, represents the only potential ecological feature that would support wildlife movement. The Los Angeles River has

not been designated as an official wildlife corridor under state or federal regulations and the portion of the river within the BSA is fully channelized with concrete to control flooding and support urban development. Due to the industrial surroundings and channelization, this segment of the river has limited ecological value and supports no natural habitat. The Project Area is separated from the Los Angeles River by an approximately five-foot-tall concrete wall that prevents many terrestrial wildlife species using the river as a movement corridor or from entering the site. Due to the heavy industrial conditions in the BSA, the proposed Project would not have adverse effects on wildlife movement.

4.4 Aquatic Resources

The only aquatic resource identified in the BSA is the Los Angeles River, located along the eastern boundary of Vernon (Figure 6). This channelized waterway serves as a significant hydrological feature for the region despite its heavily modified condition. The Los Angeles River constitutes jurisdictional waters under Section 404 of CWA and is subject to regulatory oversight by USACE and CDFW (USEPA 2013). No Project activities are proposed within the ordinary high-water mark of the Los Angeles River. No direct or indirect impacts to this river are anticipated because of the proposed Project.

Figure 6. Jurisdictional Waters



5.0 Environmental Baseline and Cumulative Effects

5.1 Environmental Baseline

5.1.1 Background

Since its founding in 1905, Vernon has served as an industrial hub in Southern California. Originally farmland, its proximity to Los Angeles and major rail lines facilitated rapid industrial development after the 1920s. The majority of the City is zoned as industrial and historically consisted of stockyards, meatpacking, and manufacturing. Over time, the industrial markets transitioned to specialized manufacturing, processing, and storage (City of Vernon 2025).

5.1.2 Topography and Climate

Vernon is located within the Los Angeles Basin, approximately 200 feet above sea level. The area is predominantly flat with little topographic complexity. The Los Angeles River runs southeast through the City limits in a concrete flood control channel designed to divert stormwater and allow for urban drainage. The City is part of the Santa Ana Hydrologic Unit Code (HUC) 18070203.

Vernon experiences hot, dry summers and mild winters, typical of Southern California climatic conditions. Due to the highly urban landscape, the heat island effect makes it warmer than the surrounding areas. Average temperatures range from the high 60s °F to the high 80s °F throughout the year, with occasional heat waves exceeding 100°F. Rainfall is limited, averaging about 15 inches annually, primarily in winter and early spring (Climate-Data.org 2025).

5.1.3 Surrounding Land Use

The Project Area sits on an empty, recently demolished industrial lot surrounded by heavy industrial and manufacturing facilities. The Project Area is bordered by

ongoing construction to the south, a packing facility to the east, and the Los Angeles River to the north. The river is separated from the Project Area by a concrete wall. The transmission line corridors are entirely located in an area of developed manufacturing and processing facilities. Throughout the BSA, there are a few isolated, enclosed lots that have been heavily disturbed but are not currently developed. A high-voltage electrical transmission corridor runs north-south between S. Downy Rd and Alcoa Ave. The land under the transmission lines is either paved, bare ground, or invasive grasses and forbs that show signs of regular mowing.

5.2 Significance Criteria

According to Appendix G of the State CEQA Guidelines, a project would have a significant impact on biological resources dependent on the following:

a) Results in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or as designated by the CDFW or USFWS;

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

c) Has a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the CWA, through direct removal, filling, hydrological interruption, or other means;

d) Substantially interferes with the movement of any native resident or migratory fish or wildlife species, disrupts established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites;

e) Conflicts with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

f) Conflicts with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or any other approved local, regional, or state habitat conservation plan.

5.3 Project Effects

The proposed Project is expected to have no direct or indirect impacts on wildlife, special-status species, and aquatic resources. By evaluating the significance criteria, Project impacts will be minimal and not have adverse effects on any biological resources in the area.

a) Habitat modification will be limited to the Project Area including the transmission lines and parcels 6303-005-035 and 6303-005-036, which have been determined to contain only bare ground or existing industrial development. There will be no expected impacts on habitats in this area.

b) No sensitive habitat was identified within or near the BSA.

c) The segment of the Los Angeles River adjacent to the Project Area is fully channelized and has no riparian buffer. No activities from the Project will occur within or alter the ordinary high-water mark or banks of the river. No impacts on the Los Angeles River or its associated jurisdictional waters are expected as a result of Project activities.

d) No wildlife corridors were identified near the BSA nor would the Project impact the movement of any native resident or migratory fish or wildlife species. The Los Angeles River represents the primary potential ecological feature for wildlife movement and will not be altered or impacted by Project development.

e) There are no conflicting local regulations within the Project scope, given Vernon's limited biological resources.

f) The Project does not conflict with any General Plans or the Los Angeles River Master Plan.

6.0 Mitigation Measures

Due to the limited biological resources and the high level of existing disturbance and development in the area, the proposed Project is not anticipated to cause impacts that would require mitigation.

7.0 References

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[USACE] US Army Corps of Engineers. 2008b. A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States: A Delineation Manual.

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Appendix A.
Representative Site Photos

Photo 1. Project Area Facing North

Photo 2. Project Area Facing West

Photo 3. Project Area Facing South

Photo 4. Transmission Line Location Along E Vernon Ave.

Photo 5. Transmission Line Location on E 50th St.

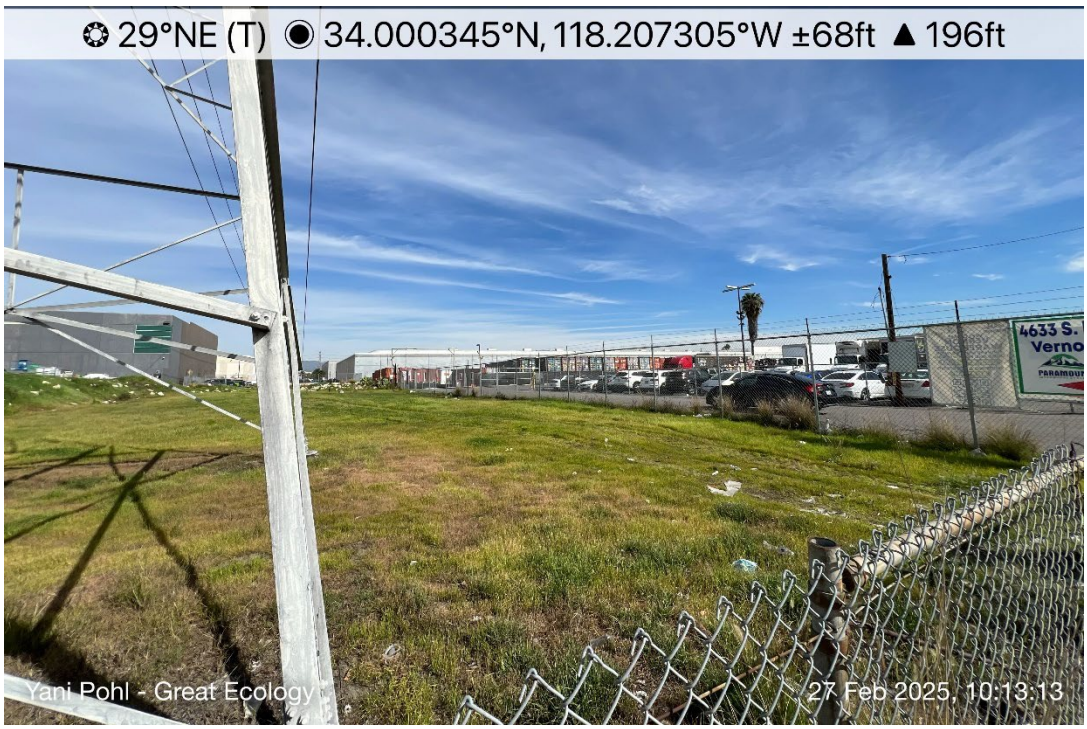

Photo 6. Utility Easement Adjacent to Transmission Line Location on Leonis Blvd.

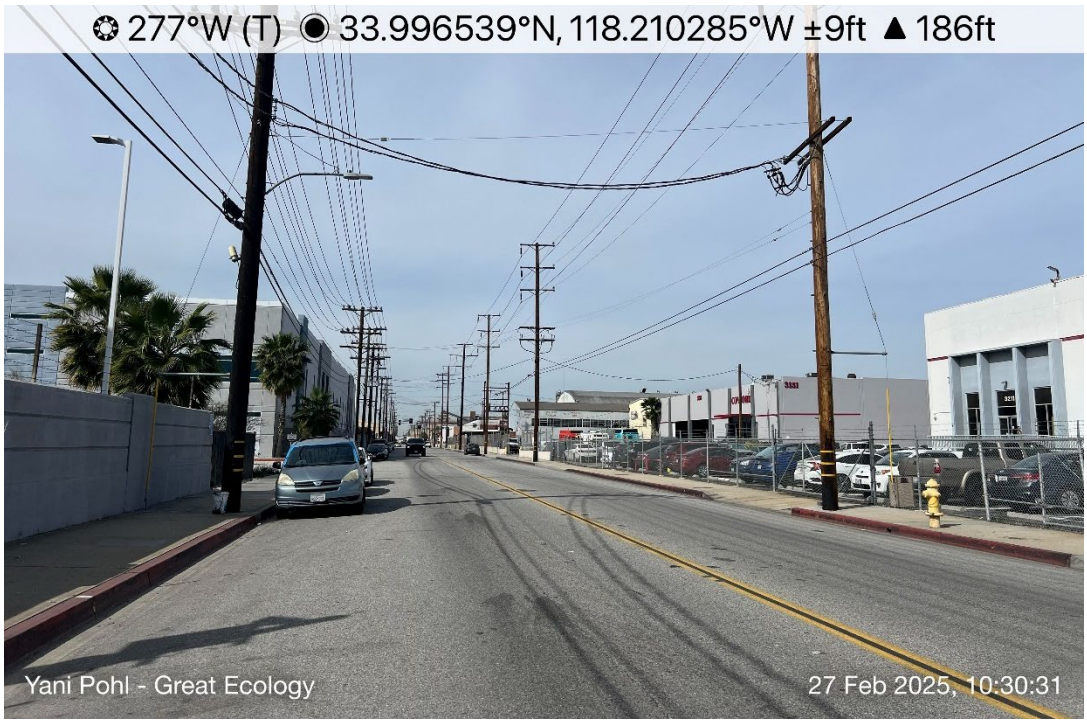

Photo 7. Transmission Line Location on Fruitland Ave.

Photo 8. Mule Fat Northwest of Project Area

Photo 9. Soto St.

Photo 10. Facing East from Corner of Soto St. and E Vernon Ave.

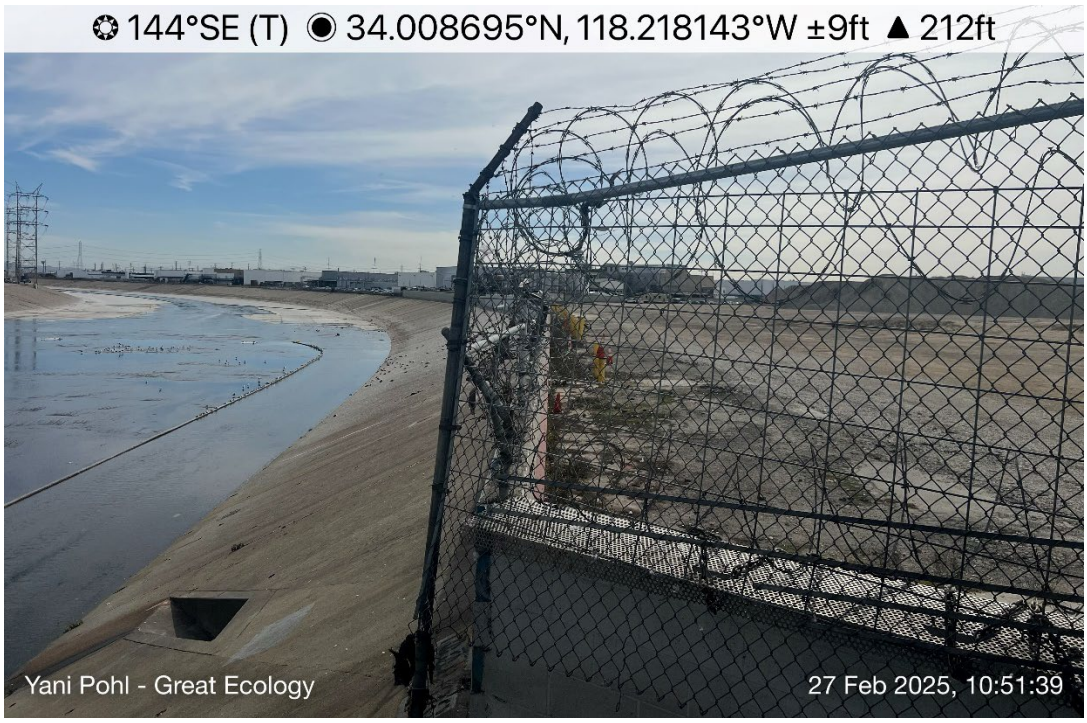

Photo 11. LA River from West Side of Bandini Bridge

Photo 12. LA River From Bandini Bridge Facing North

Appendix B. California Wildlife Habitat Relationship (CWHR) System Predicted Habitat Within 10 Miles

Habitat	Primary Species	Scientific Names
Annual Grassland	Wild Oats	*Avena* spp.
	Sofy Chess	*Bromus hordeaceus*
	Brome Species	*Bromus* spp.
Barren	Rock	N/A
	Gravel	N/A
	Soil	N/A
Coastal Oak Woodland	Coast Live Oak	*Quercus agrifolia*
	Engelmann Oak	*Quercus engelmannii*
	Island Oak	*Quercus tomentella*
Chamise- Redshank Chapparal	Chamise	*Adenostoma fasciculatum*
	Redshank	*Adenostoma sparsifolium*
	Ceanothus Species	*Ceanothus* spp.
Coastal Scrub	Coyote Brush	*Baccharis pilularis*
	California Buckwheat	*Eriogonum fasciculatum*
	Sage Species	*Salvia* spp.
Eucalyptus	Blue Gum	*Eucalyptus globulus*
	Red Gum	*Eucalyptus camaldulensis*
Fresh Emergent Wetland	Cattail	*Typha* spp.
	Bulrush	*Schoenoplectus* spp. / *Scirpus* spp.
	Redroot Nutgrass	*Cyperus erythrorhizos*
Lacustrine	Plankton	Various species
	Duckweed	*Lemna* spp.
	Water Lillies	*Nymphaea* spp.
Mixed Chapparal	Scrub Oak	*Quercus berberidifolia*
	Ceanothus Species	*Ceanothus* spp.
	Manzanita Species	*Arctostaphylos* spp.
Perennial Grassland	California Oatgrass	*Danthonia californica*
	Hairgrass	*Deschampsia* spp.
	Sweet Vernalgrass	*Anthoxanthum odoratum*
Riverine	Water Moss	*Fontinalis* spp.
	Algae	Various species
	Duckweed	*Lemna* spp.
Urban	Grass Lawns	*Lolium perenne* / *Poa pratensis*
	Ornamental Trees	Various species
	Hedges	Various species
Valley Oak Woodland	Valley Oak	*Quercus lobata*
	California Walnut	*Juglans californica*
	California Sycamore	*Platanus racemosa*
Valley Foothill Riparian	Fremont Cottonwood	*Populus fremontii*
	California Sycamore	*Platanus racemosa*
	Valley Oak	*Quercus lobata*

Appendix C.
California Natural Diversity Database (CNDDB) Commercial Results Within 10 Miles

Scientific Name	Common Name	Federal Status	California Status	CDFW Status	Other Status	Presence			Last Observation	
						Extirpated	Possibly Extirpated	Presumed Extant	<20 years ago	> 20 years ago
Amphibians										
Spea hammondii	western spadefoot	Proposed Threatened	None	SSC	BLM_S; IUCN_NT	0	5	1	0	2
Birds										
Agelaius tricolor	tricolored blackbird	None	Threatened	SSC	BLM_S; IUCN_EN; USFWS_BCC	0	1	0	0	1
Aimophila ruficeps canescens	southern California rufous-crowned sparrow	None	None	WL		0	0	1	1	0
Athene cunicularia	burrowing owl	None	Candidate Endangered	SSC	BLM_S; IUCN_LC; USFWS_BCC	0	0	2	0	2
Buteo swainsoni	Swainson's hawk	None	Threatened	None	BLM_S; IUCN_LC	0	1	0	0	1
Coccyzus americanus occidentalis	western yellow-billed cuckoo	Threatened	Endangered	None	BLM_S; USFS_S	1	1	0	0	2
Coturnicops noveboracensis	yellow rail	None	None	SSC	IUCN_LC; USFS_S; USFWS_BCC	0	0	1	0	1
Empidonax traillii extimus	southwestern willow flycatcher	Endangered	Endangered			0	0	3	0	1
Falco peregrinus anatum	American peregrine falcon	Delisted	Delisted		CDF_S	0	0	1	0	1
Icteria virens	yellow-breasted chat	None	None	SSC	IUCN_LC	0	0	1	0	7
Polioptila californica californica	coastal California gnatcatcher	Threatened	None	SSC		0	1	6	0	2
Riparia riparia	bank swallow	None	Threatened		BLM_S; IUCN_LC	2	0	0	0	2
Vireo bellii pusillus	least Bell's vireo	Endangered	Endangered			0	8	1	0	0
Dicots										
Arenaria paludicola	marsh sandwort	Endangered	Endangered		SB_SBBG	1	0	0	0	1

Scientific Name	Common Name	Federal Status	California Status	CDFW Status	Other Status	Presence			Last Observation	
						Extirpated	Possibly Extirpated	Presumed Extant	<20 years ago	> 20 years ago
Astragalus tener var. *titi*	coastal dunes milk-vetch	Endangered	Endangered		SB_CalBG/RSABG	0	1	0	0	1
Atriplex coulteri	Coulter's saltbush	None	None		SB_CalBG/RSABG; SB_CRES	1	0	0	0	1
Atriplex serenana var. *davidsonii*	Davidson's saltscale	None	None		SB_CalBG/RSABG	0	2	0	0	2
Berberis nevinii	Nevin's barberry	Endangered	Endangered		SB_CalBG/RSABG; SB_SBBG	0	0	4	3	1
Calystegia felix	lucky morning-glory	None	None			0	0	3	0	3
Centromadia parryi ssp. australis	southern tarplant	None	None		SB_CalBG/RSABG; SB_CRES; SB_SBBG	1	0	7	2	6
Centromadia pungens ssp. *laevis*	smooth tarplant	None	None		BLM_S; SB_CalBG/RSABG	1	0	0	0	1
Chloropyron maritimum ssp. *maritimum*	salt marsh bird's-beak	Endangered	Endangered		BLM_S; SB_CalBG/RSABG; SB_CRES; SB_SBBG	0	1	0	0	1
Dodecahema leptoceras	slender-horned spineflower	Endangered	Endangered		SB_CalBG/RSABG	0	1	0	0	1
Dudleya multicaulis	many-stemmed dudleya	None	None		BLM_S; SB_CalBG/RSABG; USFS_S	0	1	1	0	3
Eryngium aristulatum var. *parishii*	San Diego button-celery	Endangered	Endangered		SB_CalBG/RSABG; SB_CRES	1	0	0	0	10
Helianthus nuttallii ssp. *parishii*	Los Angeles sunflower	None	None			3	0	0	0	6

Scientific Name	Common Name	Federal Status	California Status	CDFW Status	Other Status	Presence			Last Observation	
						Extirpated	Possibly Extirpated	Presumed Extant	<20 years ago	> 20 years ago
Horkelia cuneata var. *puberula*	mesa horkelia	None	None		BLM_S; SB_CalBG/RSABG; USFS_S	4	1	1	1	0
Lasthenia glabrata ssp. *coulteri*	Coulter's goldfields	None	None		BLM_S; SB_CalBG/RSABG; SB_SBBG	0	3	1	0	1
Lepidium virginicum var. *robinsonii*	Robinson's pepper-grass	None	None		0	0	0	1	0	2
Nasturtium gambelii	Gambel's water cress	Endangered	Threatened		SB_CalBG/RSABG; SB_SBBG	1	0	0	0	1
Navarretia fossalis	spreading navarretia	Threatened	None		SB_CalBG/RSABG; SB_CRES	1	0	0	0	5
Navarretia prostrata	prostrate vernal pool navarretia	None	None		BLM_S	1	4	0	0	1
Phacelia stellaris	Brand's star phacelia	None	None		SB_CalBG/RSABG	0	1	0	0	5
Pseudognaphalium leucocephalum	white rabbit-tobacco	None	None			0	0	2	1	1
Quercus dumosa	Nuttall's scrub oak	None	None		BLM_S; IUCN_EN; SB_CRES; USFS_S	0	0	2	0	3
Ribes divaricatum var. *parishii*	Parish's gooseberry	None	None			0	3	0	0	2
Sidalcea neomexicana	salt spring checkerbloom	None	None		USFS_S	0	1	1	0	3
Symphyotrichum defoliatum	San Bernardino aster	None	None		BLM_S; SB_CalBG/RSABG; SB_CRES; USFS_S	2	0	0	0	2
Symphyotrichum greatae	Greata's aster	None	None		BLM_S; SB_CalBG/RSABG	0	2	0	0	4
Insects										

Scientific Name	Common Name	Federal Status	California Status	CDFW Status	Other Status	Presence			Last Observation	
						Extirpated	Possibly Extirpated	Presumed Extant	<20 years ago	> 20 years ago
Bombus crotchii	Crotch's bumble bee	None	Candidate Endangered		IUCN_EN	0	0	11	4	6
Bombus pensylvanicus	American bumble bee	None	None		IUCN_VU	0	0	71	60	11
Brennania belkini	Belkin's dune tabanid fly	None	None		IUCN_VU	0	1	0	0	1
Glaucopsyche lygdamus palosverdesensis	Palos Verdes blue butterfly	Endangered	None			0	0	1	0	2
Mammals										
Antrozous pallidus	pallid bat	None	None	SSC	BLM_S; IUCN_LC; USFS_S	0	0	4	0	4
Eumops perotis californicus	western mastiff bat	None	None	SSC	BLM_S	0	0	10	1	0
Lasiurus cinereus	hoary bat	None	None		IUCN_LC	0	0	7	0	1
Lasiurus xanthinus	western yellow bat	None	None	SSC	IUCN_LC	0	0	1	0	4
Microtus californicus stephensi	south coast marsh vole	None	None	SSC		0	0	2	0	1
Nyctinomops femorosaccus	pocketed free-tailed bat	None	None	SSC	IUCN_LC	0	0	1	0	1
Nyctinomops macrotis	big free-tailed bat	None	None	SSC	IUCN_LC	0	0	1	0	1
Taxidea taxus	American badger	None	None	SSC	IUCN_LC	0	0	1	1	8
Mollusks										
Glyptostoma gabrielense	San Gabriel chestnut	None	None			0	3	1	0	1
Gonidea angulata	western ridged mussel	None	None		IUCN_VU	2	0	0	0	3
Monocots										

Scientific Name	Common Name	Federal Status	California Status	CDFW Status	Other Status	Presence			Last Observation	
						Extirpated	Possibly Extirpated	Presumed Extant	<20 years ago	> 20 years ago
Calochortus plummerae	Plummer's mariposa-lily	None	None		SB_CalBG/RSABG	0	1	0	0	1
Orcuttia californica	California Orcutt grass	Endangered	Endangered		SB_CalBG/RSABG; SB_CRES	2	0	0	0	1
Reptiles										
Actinemys pallida	southwestern pond turtle	Proposed Threatened	None	SSC	BLM_S; IUCN_VU; USFS_S	0	2	1	0	3
Anniella stebbinsi	Southern California legless lizard	None	None	SSC	USFS_S	0	0	12	4	8
Arizona elegans occidentalis	California glossy snake	None	None	SSC		0	0	1	0	1
Aspidoscelis tigris stejnegeri	coastal whiptail	None	None	SSC		0	0	1	0	1
Phrynosoma blainvillii	coast horned lizard	None	None	SSC	BLM_S; IUCN_LC	1	4	2	5	2
Thamnophis sirtalis pop. 1	south coast gartersnake	None	None	SSC		4	0	0	0	1
Habitat										
Southern Sycamore Alder Riparian Woodland	Southern Sycamore Alder Riparian Woodland	None	None			1	0	2	0	6
California Walnut Woodland	California Walnut Woodland	None	None			0	0	1	0	1
Walnut Forest	Walnut Forest	None	None			0	0	1	0	0

Appendix D.
Information for Planning and Consultation (IPaC) Results

4.5 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

This section describes the existing cultural, archaeological, and historical resources setting and potential effects from project implementation on the project site and its surrounding area. This section is based on and hereby incorporates by reference, an Archaeological and Built Environment Resources Inventory Report for the Project, Cultural Resources Assessment prepared by Chronical Heritage, dated May 19 2025, which is also included in Appendix D of this SPPE Application (CRR). The CRR has been prepared in accordance with previous CEC Staff guidance and has been docketed pursuant to a Request For Confidentiality.

To avoid any potential disclosure of sensitive information and to avoid inconsistencies, this section contains only a summary of the conclusions of the CRR relevant to a CEQA analysis, and includes applicant proposed Project Design Measures (PDMs). This section is intended to be read together with the CRR.

4.5.1 CEQA Checklist

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Cultural Resources and Tribal Cultural Resources				
Would the project:				
1) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	☐	☐	☒	☐
2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☒	☐
3) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
4) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☒	☐
5) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

4.5.2 Environmental Setting

4.5.2.1 Regulatory Framework

Federal

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

The NRHP is the nation's master inventory of historic resources that are considered significant at the national, state, or local level. The minimum criteria for determining NRHP eligibility include:

- The property is at least 50 years old (properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
- It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and
- It possesses at least one of the following characteristics:
    - Association with events that have made a significant contribution to the broad patterns of history;
    - Association with the lives of persons significant in the past;
    - Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction; or
    - Has yielded, or may yield, information important to prehistory or history.

State

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public

Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
- Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
- Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

4.5.2.2 Project Site

The proposed Project is on a vacant 11.55-ac parcel; the address of Building 1 is 3163 East Vernon Avenue (Assessor's Parcel No. [APN] 6303-005-036), and the address of Building 2 is 3049 East Vernon Avenue (APN 6303-005-035) (Figure 1-1 and Figure 1-2). The site formerly included part of the Smithfield Meats Corporation warehouses and packaging facilities that operated from 1931 until the facility was demolished in 2023. The Project area is in Township (T) 2 South (S), Range (R) 13 West (W), within San Antonio Luo Land Grant as depicted on the Los Angeles, CA (1982) and South Gate, CA (1982), 7.5-minute U.S. Geological Survey (USGS) topographic quadrangle.

The proposed Project will develop the vacant parcel into a data center campus and construct an approximately 2-mi transmission line to service the facility. The GEP will consist of two data center buildings (Buildings 1 and 2) northeast of the Vernon Avenue and Soto Street intersection and just south of the Los Angeles River.

Section 3 of the CRR includes a complete description of the Project Setting including:

- Natural Setting
- Cultural Setting
    - Archaeological Context
    - Historic Context
    - Ethnohistoric Context
- Cultural Resource Inventory

    - Previous Cultural Resource Investigations
    - Previously Recorded Cultural Resources
- Native American Outreach

Section 4 of the CRR describes the Research Design. Section 5 includes a description of the Cultural Resource Fieldwork Methodology. Sections 6 and 7 include Findings and Interpretation of Results.

The CRR recommended that mitigation include the use of a Native American monitor during construction.

4.5.3 Environmental Impact Discussion

4.5.3.1 Would the project cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?

As described in the CRR no historical resources were observed during the survey of the site and the Project Site appears to have a low sensitivity for encountering intact buried resources. The presence of historic-period properties in the vicinity suggests that this area has undergone continued intensive use and industrial development and as discussed in Section 5 of the CRR, the continued intensive use has resulted in continuing building modifications. These remains are limited to surface manifestations, suggesting that there is a relatively low likelihood of encountering buried historic-period archaeological remains in the Project area.

The CRR includes a complete discussion of historic resources that are off-site in Sections 5 and 6. The CRR concludes that the Project will not result in significant impacts to offsite historical resources.

The CRR did not recommend full-time archaeological monitoring during construction ground disturbing activities. The CRR recommended that if potentially significant cultural materials be encountered during construction, all work should be halted in the vicinity of the discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resources. The applicant proposes **PDM CUL-1** to adequately train workers to recognize potentially significant cultural resources and **PDM CUL-2** to implement the monitoring of the site as recommended in the CRR. With the incorporation of **PDM CUL-1** and **PDM-2** potential impacts to historic resources would be less than significant. **(Less Than Significant Impact).**

4.5.3.2 Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Construction

As described in the CRR, no archaeological resources were observed during the survey. Based on the level of existing disturbance of the Project site and the results of the survey, the Project area appears to have a low sensitivity for encountering intact buried prehistoric archaeological resources. The presence of historic-period properties in the vicinity suggests that this area has undergone continued intensive use and industrial development likely disturbing the subsurface throughout the region. These remains are limited to surface manifestations, suggesting that there is a relatively low likelihood of encountering buried historic-period archaeological remains in the Project area. The CRR recommended that a Tribal Monitor be retained for ground-disturbing activities as the Project progresses. The CRR did not recommend full-time archaeological monitoring during construction ground disturbing activities. The CRR recommended that should potentially significant cultural materials be encountered during construction activities all work should be halted in the vicinity of the discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resources.

With implementation of **PDM CUL-1** and **PDM CUL-2** potential impacts to archaeological resources will be less than significant. **(Less Than Significant Impact).**

4.5.3.3 Would the project disturb any human remains, including those interred outside of formal cemeteries?

Construction

No human remains or cemeteries are known to exist within or near the project site. However, there is always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. This represents a potentially significant impact related to human remains. The Applicant proposes **PDM CUL-3** which would require that in the event human remains are discovered during construction, work be halted, and the County Coroner be called to make a determination as to the nature of the remains and to confirm the next steps regarding contacting the NAHC and appropriate tribal representatives. In addition, in the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5(d)—Effects on Human Remains, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and Section 5097.98 must be followed. Therefore, with implementation of **PDM CUL-3** and compliance with aforementioned CEQA Guidelines, direct and indirect impacts related to disturbance of human remains would be less than significant. **(Less than Significant Impact)**

4.5.3.4 Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

No listed or potentially eligible TCRs have been identified within the project site. Specifically, a request to the NAHC Sacred Lands File (See CRR) a records search conducted at the South Central Coastal Information Center (SCCIC), and a pedestrian survey of the project site failed to identify any listed TCRs that could be adversely affected by construction of the proposed project. As such, there are no known eligible or potentially eligible TCRs that could be adversely affected by the proposed project. Therefore, impacts related to previously listed TCRs would be less than significant. **(Less Than Significant Impact)**

4.5.3.5 Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

Chronicle Heritage requested a search of the NAHC Sacred Lands File on January 29, 2025. The NAHC responded on February 10, 2025; the NAHC stated the results of their search were negative and provided Chronicle Heritage with a list of 15 Native American tribal representatives for the Project area. On February 27, 2025, Chronicle Heritage sent out informal Native American outreach Cultural Resources Assessment for the Goodman Energy Park Data Center in City of Vernon, Los Angeles County, California 18 letters to all 15 individuals on the NAHC list, representing three local Native American tribal groups, to elicit information on Native American cultural resources that may be in the vicinity of the proposed Project. Follow-up emails with an attached letter were sent to each individual on February 27, 2025. The NAHC results, Native American contact list, and documented correspondence are included in the CRR.

To date, Chronicle Heritage has received two responses:

- On February 28, 2025, Christina Conley, Tribal Cultural Resource Administrator Under Tribal Chair Robert Dorame, responded via email asking whether any cultural reporting had been done outside of historic searches. Conley expressed concerns due to the proximity of the Los Angeles River and the main village of

Yaanga or the large Tongva village that was originally located near downtown Los Angeles. Chase Mahan, Chronicle Heritage Principal Investigator, responded.

- On March 3, 2025, Tribal Administrator for the Santa Rosa Band of Cahuilla Indians, Vanessa Minott, responded via email stating that they defer comments to the Soboba Band of Luiseno Indians cultural resource department.

Impacts related to previously listed TCRs would be less than significant. **(Less Than Significant Impact)**

4.5.4 Project Design Measures

PDM CUL-1: Worker Environmental Awareness Program Training

Prior to issuance of the grading permit by the City of Vernon, and for the duration of ground disturbance, the project shall be required to submit evidence that Worker Environmental Awareness Program (WEAP) training was held for all existing and any new employees. The training shall be facilitated by the project archaeologist in coordination with a Native American representative registered with the Native American Heritage Commissions with an interest in the City of Vernon and that is traditionally and culturally affiliated with the geographic area as described in Public Resources Code, section 21080.3. This training should include: a discussion of applicable laws and penalties under the laws; samples or visual aids of artifacts that could be encountered in the project vicinity, including what those artifacts may look like partially buried, or wholly buried and freshly exposed, and instructions to halt work in the vicinity of any potential cultural resource discovery, and notify the City-approved archaeologist and Native American cultural resources monitor. The Native American monitor shall provide a Tribal Cultural Resources Sensitivity Training in conjunction with the WEAP.

PDM CUL-2: Construction Monitoring and Protection Measures

All ground-disturbing activities (e.g., grading and excavation) shall be completed under the observation a qualified Native American monitor, registered with the Native American Heritage Commission (NAHC) with an interest in the City of Vernon. Preference in selecting Native American monitors shall be given to members of the Native Americans with:

- Traditional ties to the area being monitored.
- Knowledge of local Native American village sites and habitation patterns.
- Knowledge and understanding of Health and Safety Code, section 7050.5 and Public Resources Code, section 5097.9 et seq.

- Ability to effectively communicate the requirements of Health and Safety Code, section 7050.5 and Public Resources Code, section 5097.9 et seq.
- Ability to work with law enforcement officials and the Native American Heritage Commission to ensure the return of all associated grave goods taken from a Native American grave during excavation.
- Ability to travel to project sites within traditional tribal territory.
- Knowledge and understanding of Title 14, California Code of Regulations, section 15064.5.
- Ability to advocate for the preservation in place of Native American cultural features through knowledge and understanding California Environmental Quality Act (CEQA) mitigation provisions.
- Ability to read a topographical map and be able to locate site and reburial locations for future inclusion in the NAHC's Sacred Lands Inventory.
- Knowledge and understanding of archaeological practices, including the phases of archaeological investigation.

If construction crews encounter a cultural resource, all work shall stop temporarily within 50 feet of the find until a qualified archaeologist in consultation with a qualified Native American monitor has been contacted to determine the proper course of action. The City of Vernon shall be notified of any finds during the grading or other construction activities. Any human remains encountered during construction shall be treated according to the protocol identified in **PDM CUL-3.**

PDM CUL-3: Human Remains

If human remains are discovered during the preliminary field investigation, excavation and/or grading, building, or other construction activities at the site, all activity within a 50-foot radius of the find will be stopped. The Los Angeles County Coroner will be notified and shall determine whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission (NAHC) immediately. Once NAHC identifies the most likely descendants, the descendants will make recommendations regarding treatment and disposition with appropriate dignity, which will be implemented in accordance with section 15064.5(e) of the California Environmental Quality Act Guidelines. All actions taken under this mitigation measure shall comply with Health and Human Safety Code, section 7050.5(b).

4.5.5 Governmental Agencies

The CEC as lead agency will conduct outreach to Native American tribes. The City of Vernon will ensure the project applicant complies with all archaeological or historic resource related regulations as part of its permitting review and compliance process.

APPENDIX D

Cultural Resources Report

Filed Under Request For Confidentiality