



August 6, 2019

Tracy Zinn, Principal
T&B Planning, Inc.
17542 East 17th Street, Ste. 100
Tustin, CA 92780

SUBJECT: *Summary of Results, ±47.5-acre Site, City of Fontana, San Bernardino County, California*

Dear Tracy:

This letter presents a findings summary regarding a reconnaissance-level survey conducted to generally evaluate the suitability of a ±47-acre site to support sensitive biological resources with specific emphasis on the Delhi Sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*-DSFF). The subject site is regionally located south of Santa Ana Avenue, north of Jurupa Avenue, east of Cypress Avenue, and west of Juniper Avenue.

Ecological Sciences, Inc. biologists conducted a reconnaissance-level field survey to characterize on-site habitats and to evaluate their potential to support DSFF in May 2019. Based on results of the May 2019 habitat suitability evaluation, existing conditions present on site are not consistent with those known or expected to support a DSFF population. Substrate conditions are also not consistent with those most often correlated with potential DSFF habitat. No exposed natural or semi-natural open areas with unconsolidated wind-worked granitic soils or dunes are present. Exposure to historic and recurring substrate disturbances have substantial negative effects on potential DSFF habitat and may also prevent potentially suitable DSFF microhabitat soil conditions from developing. Although a few native plant species are present that are often associated with potential DSFF habitat, the context in which these species occur (e.g., scattered within disturbed site conditions) does not constitute a native plant community most commonly associated with potential DSFF habitat. The underlying soil environment appears to be the most definitive factor of whether an area could potentially support DSFF.

There is no direct connectivity to the subject site from the nearest known DSFF population due to the presence of existing commercial and residential development that surrounds the site. While this species likely has the capability of dispersing over relatively large distances of seemingly unsuitable habitats under certain circumstances, it would be reasonable to assume (based on our current knowledge of the species) that the likelihood of DSFF dispersing to the subject site from the nearest known off-site occupied site would not be expected despite the fact that variables such as the length, width, and structural characteristics of dispersal corridors are not fully understood. Accordingly, the subject site would not be considered an important or viable property for preservation or restoration due to its geographic location and current/surrounding land uses which have fragmented potential DSFF habitat in the area.

In view of the site's current existing condition (e.g., compact substrates, lack of indicator plant species, geographic location, exposure to long standing disturbances, existing development) and analyses of other correlative habitat information from a wide range (e.g., relatively disturbed to more natural habitats) of occupied DSFF habitats in the region, the site does not contain habitat suitable to support or sustain a DSFF population. It would be contrary to expectation that the FWS would require focused protocol surveys within areas that support overall disturbed conditions such as those present on site.

If you have any questions regarding the results presented in this summary report, please don't hesitate to call.

Sincerely,

Ecological Sciences, Inc.



Scott D. Cameron
Principal Biologist