

**From:** [Steve Loe](#)  
**To:** [Supervisor Rowe](#); [Morrissey, Jim](#); [Freeburn, Kim@Wildlife](#); [Hugh Bialecki](#); [Andrea.Harlin@dot.ca.gov](#); [Ted Shelton](#); [Steven Farrell](#)  
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## Wildlife Comments on the proposed Blue Jay Mini-storage Facility

I have reviewed the preliminary study and Biological Resource assessment prepared by Jennings Environmental for Lilburn Corporation for this project. I served as the San Bernardino National Forest Biologist for 30 years and worked closely with the County, state and federal Fish and Wildlife, and local mountain residents to protect and maintain healthy populations of wildlife for current and future generations.

The reports significantly downplay the potential importance of the project area to wildlife. Although much of the habitat on site has been disturbed in the past, portions of the property on the South and east sides is described by the consultants as forested and is recovering in spots, Adjacent high quality habitat could also be adversely affected with the massive facility, construction, lighting, and other human disturbance.

The reports dismiss the site as unimportant to wildlife for various reasons that are not biologically correct. The habitat on the southern edge of the property and on adjacent property to the south is connected to a larger area of protected and occupied habitat for California spotted owl, southern rubber boa, San Bernardino flying squirrel, and bald eagle.

The cumulative ramifications resulting from wildfire and increasing development in the mountains is having a significant effect on these species. There is suitable habitat on the southern edge of the property and areas within the property that are recovering, and they could be restored to once again become suitable habitat. The existing habitat on the southern and eastern edge of the property needs to be protected in the development.

On February 22, 2023, the US Fish and Wildlife Service announced that they were proposing to list the Southern California distinct population segment of the California Spotted Owl as Endangered. This has not been documented and addressed in the reporting for the project. California spotted owl foraging habitat occurs on site and this must be described and mitigated for. They can and do forage in openings in the forest and will use edges of the forest to capture prey such as gophers.

San Bernardino flying squirrel habitat exists on the southern edge of the property and should be protected. All areas of forested habitat on site need to be quantified and mitigated for if it will be destroyed by the project.

Southern rubber boa could be present on the southern edge of the property and recovering forest areas. They are not totally dependent upon visible rock outcrops, large down logs, or

riparian areas. Although these are important habitat elements in various occupied areas, they are not required in all cases. Gopher burrows and other rodents burrows, as well as rotting roots of trees allow boas to seek below-ground moisture and temperatures needed to survive. Potentially occupied habitat on the southern and eastern edge needs to be quantified and mitigated for if it is impacted by the project.

Bald eagles could be using the southern end of the project as perching sites. This needs to be disclosed, protected and mitigated for.

I urge the County to conduct a better, more thoughtful analysis of the habitat for wildlife, that you protect as much forested habitat as possible, and that you will fully mitigate for habitat loss, construction disturbance, and on-going human disturbance from any development.

Please call if any questions.

Steve Loe, Certified Wildlife Biologist (TWS)  
33832 Nebraska St.  
Yucaipa, CA 92399  
909-809-9980