

## **Heather Roberts**

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**From:** Damaris Abraham <dabraham@lake-elsinore.org>  
**Sent:** Thursday, October 2, 2025 5:17 PM  
**To:** Dane Palanjian; Heather Roberts; David Moskovitz; Glen Williams; Trygg Danforth  
**Cc:** Nancy Huynh; Angie Kung; Sarah Barrera  
**Subject:** FW: JPR 24-05-03-01 (LEAP 2023-04/Baker Street Industrial Project) Findings Complete 07.31.2025

**[NON-EPD]**

FYI

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**From:** Machuca, Breanna@Wildlife <Breanna.Machuca@Wildlife.ca.gov>  
**Sent:** Thursday, October 2, 2025 1:46 PM  
**To:** Damaris Abraham <dabraham@lake-elsinore.org>; Nancy Huynh <nhuynh@lake-elsinore.org>  
**Cc:** karin\_cleary-rose@fws.gov; Thiede, James H <james\_thiede@fws.gov>; Siless, Ryan M <ryan\_siless@fws.gov>; Beck, Carly@Wildlife <Carly.Beck@wildlife.ca.gov>; Wildlife R6 MSHCP <R6MSHCP@wildlife.ca.gov>; Carol Thompson <CThompson@RCTC.org>; Aaron Gabbe <AGabbe@RCTC.org>; Harry Sandoval <hsandoval@rctc.org>; Carol Thompson <cthompson@rctc.org>; LLevy@RCTC.org; David Moskovitz <dmoskovitz@wetlandpermitting.com>; Britney Schultz <bschultz@dudek.com>; Fulgencio, Enola@Wildlife <Enola.Fulgencio@Wildlife.ca.gov>  
**Subject:** RE: JPR 24-05-03-01 (LEAP 2023-04/Baker Street Industrial Project) Findings Complete 07.31.2025

Good afternoon,

The California Department of Fish and Wildlife and the United States Fish and Wildlife Service, hereafter referred to jointly as the Wildlife Agencies, received a Determination of Biologically Equivalent or Superior Preservation (DBESP) for the Baker Industrial Project (Project) JPR 24-05-03-01 on July 31, 2025, from the City of Lake Elsinore (City).

The Wildlife Agencies appreciate the comparison of functions and values presented in the DBESP. We have reviewed the DBESP and agree with the Project's assessment of the onsite impacts to 0.50 acres of permanent impacts to MSHCP riparian/riverine resources and 0.17 acres of permanent impacts to the vernal pools. The Wildlife Agencies agree that the associated mitigation strategy to 1) purchase a minimum of 0.50 acres of riparian re-establishment credits and 1.0 acres of rehabilitation credits from an approved mitigation bank within the MSHCP boundary, such as the Riverpark Mitigation Bank and 2) applicant sponsored mitigation through the expansion of the vernal pools onsite at an impact-to-mitigation ratio of 3:1, would be biologically equivalent or superior to a complete preservation alternative.

Please condition the Project to provide proof of the completed purchase of the mitigation credits to the City and the Wildlife Agencies before issuing the grading permit for the Project. Proof of purchase would consist of (1) a receipt from the Riverpark Mitigation Bank for the Applicant's purchase of at least 0.50 acres of riparian re-establishment credits and 1.0 acres of rehabilitation credits, plus (2) a copy of the purchase contract/purchase agreement between the Riverpark Mitigation Bank and the Applicant. The purchase agreement should name Baker Street Industrial Project as the development project for which the mitigation credits are being purchased. Also, please condition the Project to provide the Habitat Mitigation and Monitoring Plan (HMMP) to the City, Wildlife Agencies, and RCA for review and approval at least 90 days prior to the initiation of Project impacts on the riparian/riverine and vernal pool habitat. City, please confirm via this email chain that these conditions will be required, and that mitigation shall occur within the boundaries of the MSHCP.

We have no further comments regarding the DBESP for the Baker Street Industrial Project. This concludes the Wildlife Agencies' review of the DBESP.

Sincerely,

**Breanna Machuca**

Senior Environmental Scientist (Specialist)  
Inland Deserts Region (6)  
3602 Inland Empire, Suite C-220  
Ontario, CA 91714

and

**James Thiede**

Senior Biologist  
United States Fish & Wildlife Service  
777 East Tahquitz Canyon Way, Suite 208  
Palm Springs, CA 92262

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**From:** Britney Schultz <[bschultz@dudek.com](mailto:bschultz@dudek.com)>

**Sent:** Thursday, July 31, 2025 1:27 PM

**To:** Damaris Abraham <[dabraham@lake-elsinore.org](mailto:dabraham@lake-elsinore.org)>

**Cc:** [karin\\_cleary-rose@fws.gov](mailto:karin_cleary-rose@fws.gov); Thiede, James H <[james\\_thiede@fws.gov](mailto:james_thiede@fws.gov)>; Siless, Ryan M <[ryan\\_siless@fws.gov](mailto:ryan_siless@fws.gov)>; Taylor, John <[john\\_m\\_taylor@fws.gov](mailto:john_m_taylor@fws.gov)>; Beck, Carly@Wildlife <[Carly.Beck@wildlife.ca.gov](mailto:Carly.Beck@wildlife.ca.gov)>; Vasquez, Alta@Wildlife <[Alta.Vasquez@Wildlife.ca.gov](mailto:Alta.Vasquez@Wildlife.ca.gov)>; Machuca, Breanna@Wildlife <[Breanna.Machuca@Wildlife.ca.gov](mailto:Breanna.Machuca@Wildlife.ca.gov)>; Wildlife R6 MSHCP <[R6MSHCP@wildlife.ca.gov](mailto:R6MSHCP@wildlife.ca.gov)>; Carol Thompson <[CThompson@RCTC.org](mailto:CThompson@RCTC.org)>; Aaron Gabbe <[AGabbe@RCTC.org](mailto:AGabbe@RCTC.org)>; Philip Kang <[PKang@RCTC.org](mailto:PKang@RCTC.org)>; Dara Burlo <[dburlo@rctc.org](mailto:dburlo@rctc.org)>; Hector Casillas <[HCasillas@RCTC.org](mailto:HCasillas@RCTC.org)>; Monica Tlaxcala <[MTlaxcala@RCTC.org](mailto:MTlaxcala@RCTC.org)>; Carol Thompson <[cthompson@rctc.org](mailto:cthompson@rctc.org)>; LLevy@RCTC.org; Zack West <[zwest@rctc.org](mailto:zwest@rctc.org)>; Nancy Huynh <[nhuynh@lake-elsinore.org](mailto:nhuynh@lake-elsinore.org)>; David Moskovitz <[dmoskovitz@wetlandpermitting.com](mailto:dmoskovitz@wetlandpermitting.com)>; Tricia Campbell <[TCampbell@RCTC.org](mailto:TCampbell@RCTC.org)> <[TCampbell@RCTC.org](mailto:TCampbell@RCTC.org)>

**Subject:** JPR 24-05-03-01 (LEAP 2023-04/Baker Street Industrial Project) Findings Complete 07.31.2025

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Hi Damaris,

Please see attached findings for the completed JPR 24-05-03-01 (LEAP 2023-04/Baker Street Industrial Project). Electronic copies of the JPR Findings and supporting documentation have been sent to the Wildlife Agencies, anticipated for delivery Friday (August 1, 2025). The Wildlife Agencies have 10 working days (excluding holidays) upon receipt of the documents to provide comments or concurrence back to you on the MSHCP Consistency Analysis, and a 60-day review period to provide comments or concurrence on the DBESP.

Please feel free to contact me if you have any questions.

Thank you!  
Britney

**Britney Schultz**  
Biologist



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