
September 10, 2024

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RE: Biological Constraints Letter for an Undeveloped Parcel on Arroyo Sorrento Road in the City of San Diego, California

Mr. Boregowda:

Busby Biological Services, Inc. (BBS) prepared this letter to summarize the biological resources and potential biological constraints for an undeveloped parcel on Arroyo Sorrento Road in the Carmel Valley neighborhood of the City of San Diego (City), California (Figures 1 and 2). This letter describes the common and sensitive vegetation communities/land cover types and plant and animal species observed within the parcel, potentially occurring sensitive biological resources within and adjacent to the parcel, recommendations for additional focused surveys for sensitive plants and wildlife, potential biological constraints on future development on the parcel, and recommendations for the preparation of a comprehensive biological resources report per the City's Land Development Code – Biology Guidelines (City 2018a), once all biological resource surveys are completed and the project impact limits are defined.

1.0 LOCATION

The parcel (Assessor's Parcel Number 307-061-06) is currently undeveloped and is located immediately northeast of the intersection of Arroyo Sorrento Road and Arroyo Sorrento Place, approximately 0.5 mile east of El Camino Real and 0.5 mile south of State Route 56 (Figures 1 through 3). It is bounded to the north and west by single-family residential development on partially undeveloped parcels, immediately to the east by an undeveloped parcel with a single-family residential development beyond that, and to the south by the Torrey Woods Estates single-family residential development. The parcel is not located within the Coastal Overlay Zone. The parcel lies within the Northern Area of the City's Multiple Species Conservation Program Subarea Plan (MSCP; City 1997; Figure 4), and a narrow strip along southeastern edge of the parcel is located within the Multi-Habitat Planning Area (MHPA), the City's habitat preserve. This segment of the MHPA extends off-site to the south and east, across Arroyo Sorrento Road, through the existing Torrey Woods Estates, and into the Carmel Mountain Preserve, which occurs on the far side of the Torrey Woods Estates, approximately 735 feet to the south and 1,500 feet to the east of the parcel. A narrow strip of MHPA also extends north from the Torrey Woods Estates, coming within approximately 200 feet to the northeast of the parcel.

2.0 METHODS

Prior to conducting field work, BBS conducted a database review for biological information and records of sensitive biological resources within two miles of the parcel, including California Department of Fish and Wildlife (CDFW) California Natural Diversity Database

(CDFW 2024); United States Fish and Wildlife Service (USFWS) All Species Occurrences Geographic Information System (GIS) Database (USFWS 2024); and the County of San Diego's (County's) SanBIOS GIS database (County 2024).

BBS conducted a biological reconnaissance survey within the approximately 3.10-acre survey area, which includes the 1.64-acre parcel plus a 1.46-acre, 50-foot survey buffer. The purpose of the survey was to document the existing site conditions and assess the survey area for the potential to support sensitive biological resources. The survey was conducted on foot with the aid of binoculars. Vegetation communities and land cover types were mapped by hand onto a 1:600-scale aerial photograph of the parcel vicinity and later digitized using GIS software. Plant and animal species observed or detected within the survey area were noted. Animal species were identified based on direct visual observation or indirect detection (e.g., calls, tracks, carcasses, burrows). The assessment of the potential for sensitive plant and wildlife species to occur within and adjacent to the survey area was based on existing database records, habitat requirements, and site conditions.

3.0 RESULTS

The biological reconnaissance survey was conducted by BBS biologists Brian Parker and Andrew Kort on August 14, 2024, between the hours of 1030 and 1240, with temperatures ranging from 79 to 80 degrees Fahrenheit, cloud cover of 0 percent, and wind ranging from 1 to 5 miles per hour. The results of the survey, including vegetation communities/land cover types and sensitive biological resources documented during the biological reconnaissance survey are briefly discussed below. Discussion regarding potential biological constraints for future development of the parcel are presented in Section 4.0.

3.1 Vegetation Communities/Land Cover Types

Three vegetation communities/land cover types occur within the survey area: Diegan coastal sage scrub (including disturbed), disturbed land, and urban/developed land. Table 1, below, lists acreages of the vegetation communities/land cover types within and adjacent to the parcel.

Table 1. Existing Vegetation Communities/Land Cover Types

Vegetation Community/ Land Cover Type	Tier	Survey Area*		
		Parcel	50-foot Off-site Survey Buffer	Total
Diegan Coastal Sage Scrub	II	1.50	0.38	1.89
Diegan Coastal Sage Scrub - Disturbed	II	0.12	0.28	0.40
Disturbed Land	IV	0.01	0.15	0.15
Urban/Developed Land	N/A	0.00	0.65	0.65
Total		1.64	1.46	3.10

*Areas are presented in acre(s) rounded to the nearest 0.01; sums differ slightly due to rounding

3.2 Sensitive Biological Resources

For purposes of this report, sensitive biological resources include the following:

- Vegetation communities identified as Tier 1 through IIIB in the City's Biology Guidelines (City 2018a);
- Plant and wildlife species that are:
 - covered species under the MSCP Subarea Plan (City 1997);
 - listed by state or federal agencies as threatened or endangered or are candidate or proposed for listing;
 - identified as California Rare Plant Rank (CRPR) 1B through 4 on the CNPS Inventory of Rare and Endangered Vascular Plants of California (CNPS 2024); or
 - designated by the City as a Narrow Endemic Species (City 2018a).
- Lands within or partially within the MHPA;
- Aquatic resources, coastal beaches, and coastal bluffs;
- Special Flood Hazard Areas;
- Wildlife movement corridors and nursery sites; and
- Steep hillsides.

Sensitive Vegetation Communities and Other Environmentally Sensitive Lands

Diegan coastal sage scrub (including disturbed) is considered a Tier II sensitive vegetation communities per the MSCP. As discussed in Section 4.0, Tier II sensitive vegetation communities would require mitigation if impacted. Disturbed land and urban/developed land are not considered sensitive and would not require mitigation if impacted.

The MHPA occurs along the southeastern edge of the parcel. The City's Environmentally Sensitive Lands (ESL) Regulations (City 2018b) require development restrictions within the MHPA. As noted above, this segment of the MHPA extends off-site to include existing developed areas, including Arroyo Sorrento Road and the Torrey Woods Estates. Based on a review of aerial imagery, it appears the Torrey Woods Estates development was constructed between 1998 and 2002 (Google Earth 2024). Such developed areas are generally not included in the MHPA and likely should have been either excluded from the MHPA prior to ratification of the MSCP or removed from the MHPA when the Torrey Woods Estates project was permitted. Thus, it may be possible to conduct an MSCP boundary correction to remove the MHPA from the vicinity of the parcel.

Steep hillsides are considered ESL per the City's ESL Regulations (City 2018b) and may require development restrictions. Based on the biological reconnaissance survey, it appears that the parcel does not contain steep hillsides, although a formal steep hillsides analysis was not performed. A qualified engineer would need to conduct a steep hillside analysis to concretely determine the presence or absence of steep hillsides on the parcel.

Sensitive Plant Species

Although a focused sensitive plant survey was not conducted, the following two sensitive plant species were detected during the biological reconnaissance survey: Del Mar Mesa sand aster (*Corethrogyne filaginifolia* var. *linifolia*), and wart-stemmed ceanothus (*Ceanothus verrucosus*) (Figure 4). Del Mar Mesa sand aster is a California Rare Plant Rank (CRPR) 1B.1 species (seriously threatened or endangered in California and elsewhere; CNPS 2024) and is an MSCP covered species. Wart-stemmed ceanothus (*Ceanothus verrucosus*) is a CRPR 2B.2 species (moderately rare, threatened, or endangered in California but more common elsewhere; CNPS 2024) and is an MSCP covered species (City 1997). In addition,

it should be noted that Torrey pines (*Pinus torreyana* ssp. *Torreyana*), a CRPR 1B.2 (moderately threatened in California and elsewhere) and MSCP covered species, were observed during the biological survey; however, these individuals were planted as roadside landscaping, and are, therefore, not considered protected.

The MSCP includes certain conditions for covered species, most of which are requirements for City programs within existing preserved lands, but some of which may require avoidance or additional measures for development projects.

Based on a review of database records within two miles of the parcel and the existing conditions of the vegetation communities on-site, the following two sensitive plant species that were not detected have a moderate to high potential to occur: San Diego sand aster (*Corethrogyne filaginifolia* var. *incana*) and sea dahlia (*Leptosyne maritima*). Several other sensitive plant species have recent database records within two miles of the site; however, these species are not expected to occur because they are (1) moderate-sized shrubs and would have been detected if present; (2) not known from the vicinity of the parcel; and/or are (3) strongly tied to vernal pools, which do not occur within the survey area.

Sensitive Wildlife Species

No sensitive wildlife species was detected during the biological survey. However, based on recent database records within two miles of the parcel and the existing conditions of the vegetation communities on-site, the following nine wildlife species that were not detected may have a moderate to high potential to occur: Crotch's bumble bee (*Bombus crotchii*), San Diegan legless lizard (*Anniella stebbinsi*), Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), red diamond rattlesnake (*Crotalus ruber*), Bell's sage sparrow (*Artemisiospiza belli belli*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), Coastal California gnatcatcher (*Polioptila californica californica*), southern mule deer (*Odocoileus hemionus*), and mountain lion (*Puma concolor*). Crotch's bumble bee is a candidate for listing by the CDFW (2019b) and coastal California gnatcatcher is federally threatened (CDFW 2024) and is an MSCP covered species (City 1997). The remaining seven species are not listed as threatened or endangered by CDFW or USFWS but are CDFW watch-list species, California species of special concern, and/or MSCP covered species.

Several other sensitive wildlife species have recent database records within two miles of the site; however, these species are not expected to occur because no suitable habitat is present in the vicinity of the parcel.

Wildlife Movement Corridors

The parcel provides value for local wildlife movement but is not within a defined wildlife corridor. It is immediately bounded by residential development to the east and south, with somewhat sparser development to the north and west. The connection to the Carmel Mountain Preserve to the east is highly constrained, consisting of a narrow strip of vegetation along a series of manufactured slopes associated with the adjacent developments. Furthermore, the parcel is within a terminal pocket of habitat with little regional value. Thus, it may provide stepping-stone connectivity to off-site habitat areas and would not be considered a meaningful wildlife corridor.

Potential Aquatic Resources

A formal aquatic resource delineation was not performed; however, the survey area was investigated for potential aquatic resources during the biological reconnaissance survey. No potentially jurisdictional drainages, wetlands, or wetland indicators (i.e., wetland vegetation, ordinary high-water mark, streambed, stream bank, channel) were observed within the survey area. A concrete brow ditch and culvert connected to the municipal storm drain system occur within and immediately adjacent to the southern and western boundaries of the parcel. These features do not contain wetland indicators, and therefore, would not be regulated by U.S. Army Corps of Engineers, CDFW, Regional Water Quality Control Board, or the City. A formal aquatic resources delineation is not recommended.

4.0 BIOLOGICAL CONSTRAINTS AND RECOMMENDATIONS

Based on the results of the biological reconnaissance survey, several sensitive biological resources occur or have a moderate to high potential to occur within the parcel. Therefore, a biological resources letter report would be required prior to development on the parcel in accordance with the City's Land Development Code – Biological Guidelines (City 2018a). The biological resources letter report would provide a detailed description of the biological resources that occur or have potential to occur on the parcel, analyze potentially significant impacts to those biological resources, and describe measures to avoid, minimize, or mitigate those impacts to below a level of significance.

As discussed below, additional biological studies that are expected to be required include focused surveys for sensitive plants, Crotch's bumble bee, and coastal California gnatcatcher:

- Sensitive plant surveys would be required to determine the extent of the populations of Del Mar Mesa sand aster and wart-stemmed ceanothus, as well as the presence or absence of sea dahlia and San Diego sand aster, or other potentially occurring sensitive plant species. Sensitive plant surveys would likely require two visits during spring and summer 2025.
- The City is expected to require Crotch's bumble bee surveys in accordance with the CDFW *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). Crotch's bumble bee surveys consist of three site visits spaced two to four weeks apart between April 1 and August 31.
- The City is expected to require Coastal California gnatcatcher surveys in accordance with the USFWS *Coastal California Gnatcatcher Presence/Absence Survey Protocol* (USFWS 1997). Based on the survey protocol, three site visits spaced at least one week apart would be required. The surveys may be conducted any time of the year; however, the USFWS prefers surveys to be conducted between February 15 and August 30.

Mitigation for potentially significant impacts to sensitive biological resources would be required in compliance with the City Land Development Code – Biology Guidelines (City 2018a). It is anticipated that impacts to Diegan coastal sage scrub (including disturbed) would require mitigation with conservation of Tier II habitat at a 1:1 ratio. These ratios were determined based on the location of the parcel within the MHPA and the assumption that mitigation would occur within the MHPA. Mitigation may occur through one of three options:

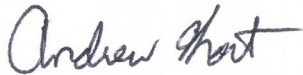
1. Acquisition and preservation of existing habitat;
2. Restoration and preservation of degraded habitat in the vicinity; or
3. Contribution to the City's Habitat Acquisition Fund.

The MSCP limits development within the MHPA, which may limit the portions of the parcel that can be developed. As noted in Section 3.0, the strip of MHPA portion of the site may have been created in error. It may be possible, therefore, to do a boundary line correction to remove the portion of the MHPA from the parcel.

Any MSCP covered plant and wildlife species that have been found, or have the potential, to occur within the parcel have conditions included in the MSCP Subarea Plan that must be met. None of the conditions are likely to be substantial constraints for development on the parcel. Avoidance, minimization, and mitigation measures for impacts to sensitive plant and wildlife species will be determined based on the results of the above focused biological surveys.

Please contact me at andrew@busbybiological.com or 619.922.7583 if you have any questions or concerns regarding this biological constraints letter.

Sincerely,



Andrew Kort
Biologist

REFERENCES

California Department of Fish and Wildlife (CDFW)

- 2019 Evaluation of the Petition from the Xerces Society, Defenders of Wildlife, and the Center for Food Safety to List Four Species of Bumble Bees as Endangered Under the California Endangered Species Act. April 4.
- 2023 Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. June 6.
- 2024 California Natural Diversity Database (CNDDB). 2024. Commercial Version. Accessed August.

California Native Plant Society (CNPS)

- 2024 Inventory of Rare and Endangered Vascular Plants of California from <http://www.rareplants.cnps.org/>. Accessed August.

City of San Diego (City)

- 1997 Multiple Species Conservation Subarea Plan. March.
- 2018a San Diego Municipal Code Land Development Code – Biology Guidelines. February 1.
- 2018b San Diego Municipal Code, Supplemental Development Regulations, Environmentally Sensitive Lands Regulations. March.

County of San Diego (County)

2024 SanBIOS GIS Database. Created in 2009. <http://www.sangis.org/>. Accessed August.

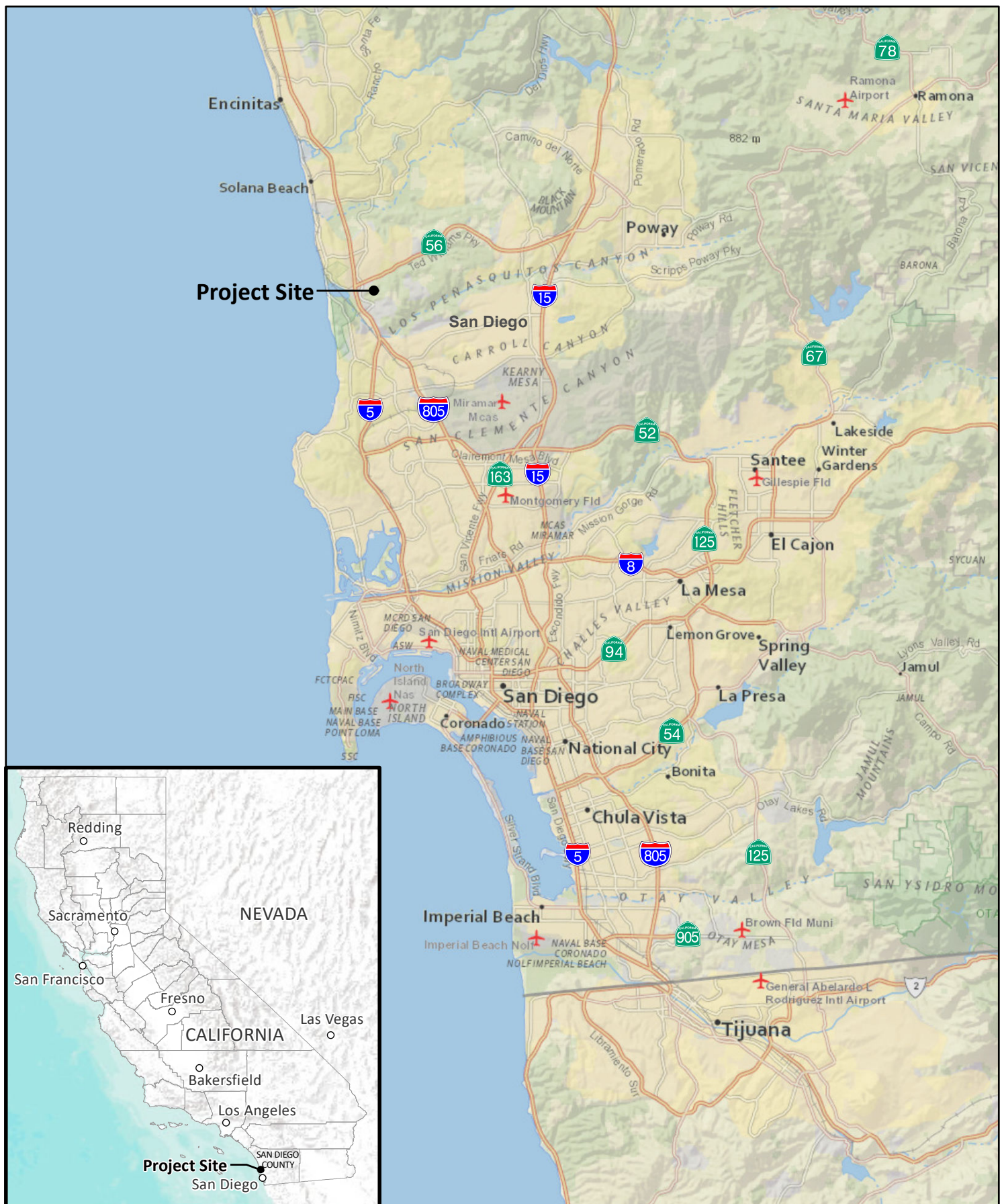
Google Earth

2024 Google Earth Version 7.3.6.9796. Accessed September.

United States Fish and Wildlife Service (USFWS)

1997 Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol. July 28.

2024 All Species Occurrences GIS Database. Carlsbad Fish and Wildlife Office. Accessed August.

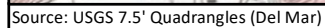


Source: National Geographic, Esri

Regional Location

ARROYO SORRENTO

Figure 1



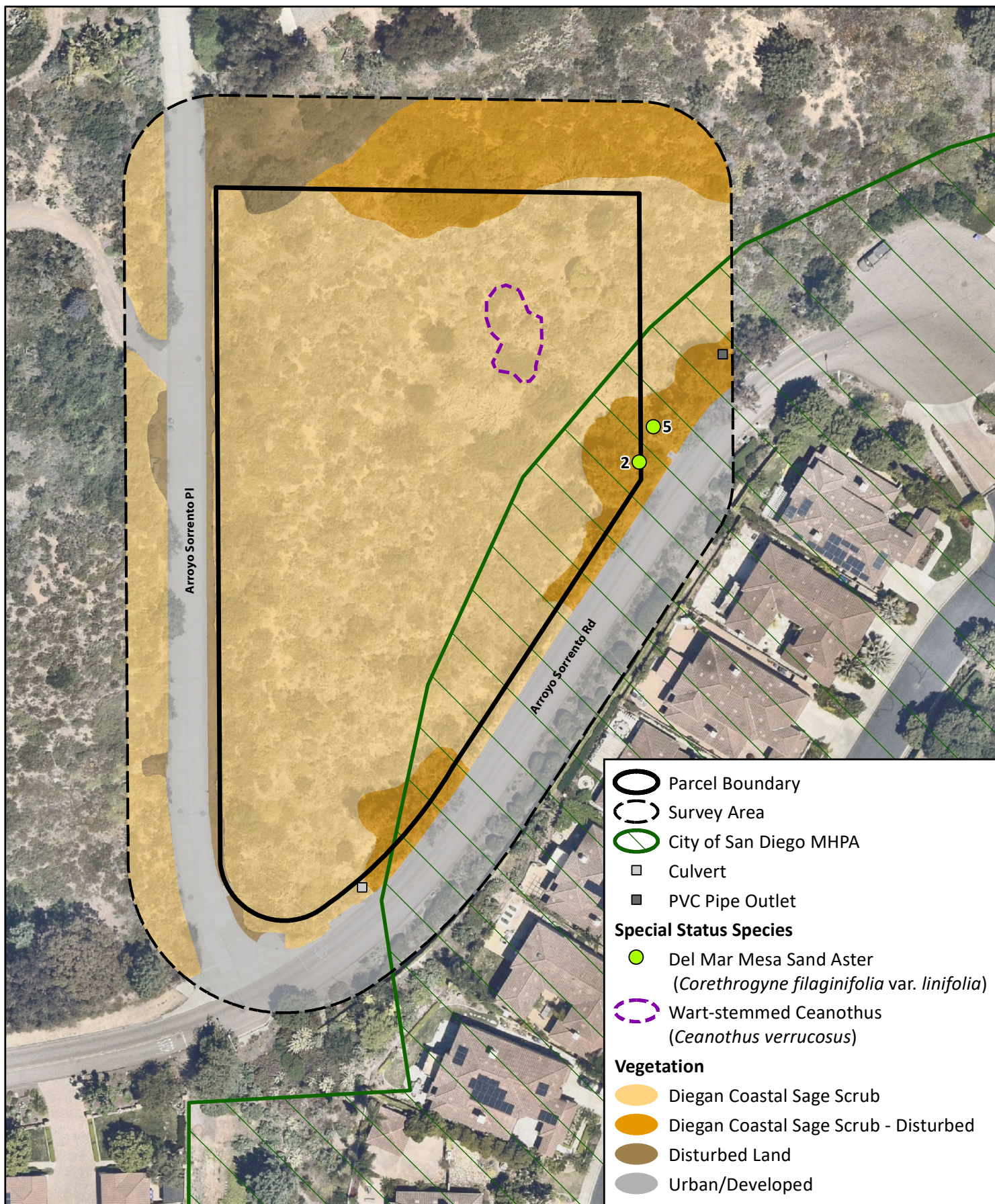
ARROYO SORRENTO



Aerial Photo: Nearmap 2024



Aerial Photo
ARROYO SORRENTO
Figure 3



- Parcel Boundary
- Survey Area
- City of San Diego MHPA
- Culvert
- PVC Pipe Outlet
- Special Status Species**
 - Del Mar Mesa Sand Aster (*Corethrogyne filaginifolia* var. *linifolia*)
 - Wart-stemmed Ceanothus (*Ceanothus verrucosus*)
- Vegetation**
 - Diegan Coastal Sage Scrub
 - Diegan Coastal Sage Scrub - Disturbed
 - Disturbed Land
 - Urban/Developed

Aerial Photo: Nearmap 2024