Memorandum

Date: July 6, 2026

To: Derek Kegley, Lennar

From: Brianna Bernard

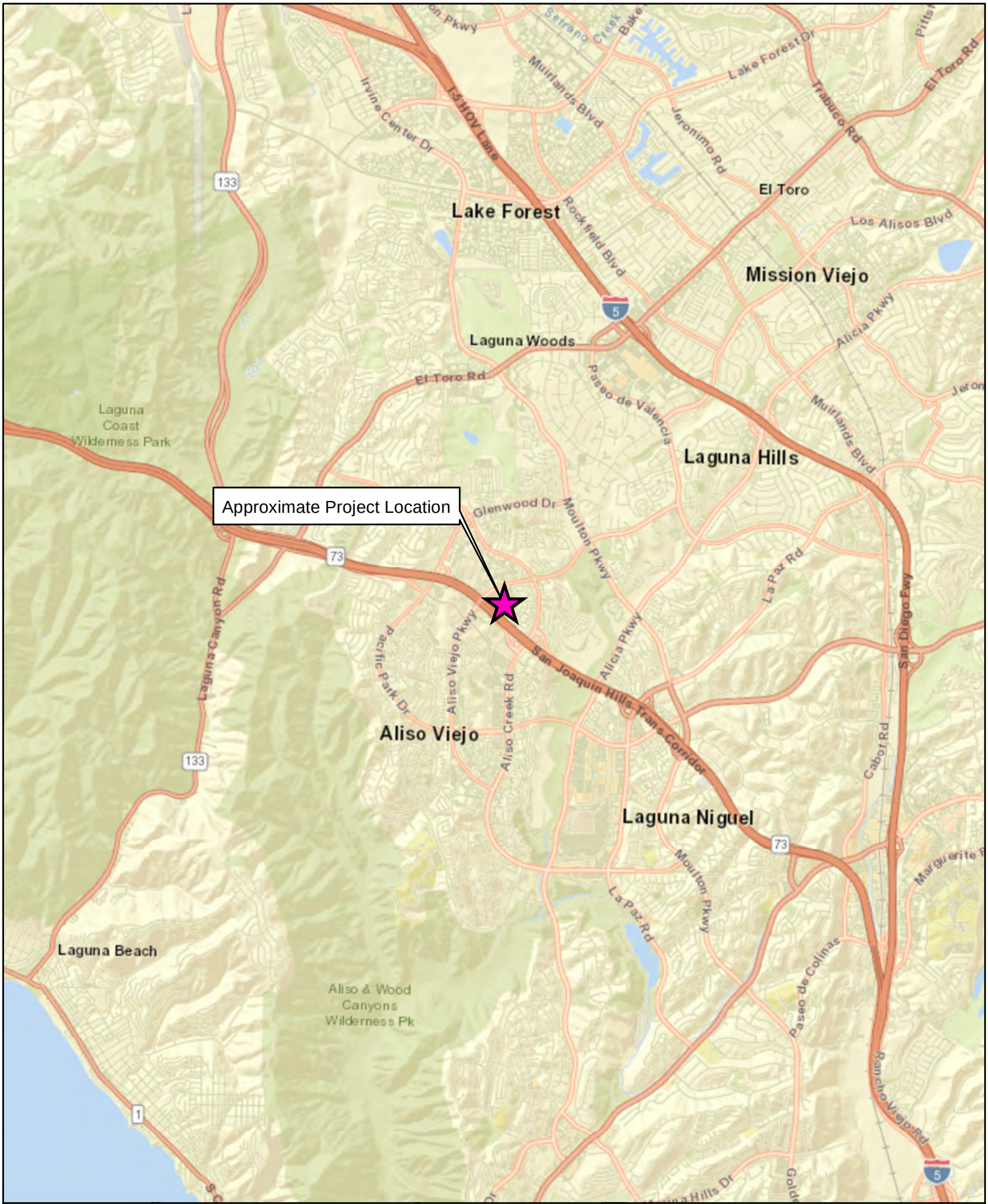
Subject: Polaris Place Residential Development Project Biological Resource Assessment in the City of Aliso Viejo

Lennar (Applicant) requested Carlson Strategic Land Solutions (CSLS) to prepare a Biological Resource Assessment memorandum and graphics documenting the finding of a field review for potential sensitive plants and wildlife for Polaris Place Residential Development Project (Project) located in the City of Aliso Viejo, California. In support of Project efforts CSLS biologist, Brianna Bernard, conducted an analysis of the biological resources onsite on July 6, 2026. This memorandum provides the results of the site visit.

1.0 Project Location and Description

The Project site is 22.5-acre in size (Assessor's Parcel Numbers (APN) 623-481-49, -50, -51, -52, and -53) and is located in the City of Aliso Viejo on the U.S. Geological Survey (USGS) Map San Juan Capistrano Quadrangle topographic map within Section 4, Township 7 south, and Range 8 west. The Project site is comprised of five separate parcels located at 1 through 5 Polaris Way, which is generally south of Aliso Viejo Parkway, between SR-73 and Aliso Creek Road in the City of Aliso Viejo (Figures 1 and 2). The Project site is bordered by attached residential uses (row townhomes) to the east and south; SR-73 to the west; and AVP and business park uses to the north. The surrounding General Plan land use designations are Medium Density Residential to the east and south, Business Park to the north, and San Joaquin Hills Transportation Corridor to the west.

The proposed Project scope will include the demolition of the existing office buildings, along with surface parking lots, and proposes to construct of 405 three-story, for-sale residential units. A tentative tract map is provided on Figure 3.



GIS Prepared By:
Carlson SLS

June 2026

0 1,250 2,500 5,000 7,500 Feet

1 inch = 5,000 feet

Data Source: Bing Maps

Polaris Place Project

Regional Location Map

FIGURE 1

GIS Prepared By:
Carlson SLS

June 2026

0 25 50 100 150 200 250 300 350 400 450 500 Feet

1 inch = 250 feet

Data Source: Bing Maps

Polaris Place Project

Project Location Map

FIGURE 2

Legend

1. Recreation Area *(Refer to Enlargement on Sheet L2)*
2. Open Space *(Refer to Enlargement on Sheet L3)*
3. Secondary Entry
4. Primary Entry *(Refer to Enlargement on Sheet L4)*
5. Pedestrian Entry Gate *(Refer to Fence, Wall and Gates Plan on Sheet L13)*
6. Emergency Vehicular Access *(Refer to Fence, Wall and Gates Plan on Sheet L13)*
7. Pedestrian Crossing
8. Private Patio with Low Wall and Gate **(Refer to Fence, Wall and Gates Plan on Sheet L13)**
9. Side Yard with Privacy Fence and Gates *(Refer to Fence, Wall and Gates Plan on Sheet L13)*
10. Low Perimeter Fence *(Refer to Fence, Wall and Gates Plan on Sheet L13)*
11. Tall Perimeter Fence *(Refer to Fence, Wall and Gates Plan on Sheet L13)*
12. Retaining Wall *(Refer to Fence, Wall and Gates Plan on Sheet L13)*
13. Perimeter Walk
14. Mailboxes

Gross Site Area: ±22.5 ac
Open Space Provided: ±6.0 ac (26.7%)

Building and Parking Count

- 4 STORY DUPLEX - 105 Units
- 3 STORY DUPLEX - 108 Units
- 3 STORY ROWTOWNS - 100 Units
- 3 STORY ROWTOWNS WITH TANDEM - 92 Units

TOTAL = 405 Units
GUEST PARKING - 203 SPACES

Aliso Viejo Parkway

73 Toll Road

MARCH 12, 2026

CONCEPT DESIGN ONLY AND SUBJECT TO CHANGE AS PART OF FINAL ENGINEERING

0 20 40 80

POLARIS PLACE - PROJECT ENTITLEMENT CONCEPTUAL SITE PLAN

LENNAR
March 09 , 2026

EPTDESIGN

Figure 3 L1

2.0 Methodology

2.1 Biological Survey

Prior to the field survey, available literature, historical aerials, and databases were reviewed regarding sensitive habitats, special status plants, and wildlife species within the vicinity. CSLS reviewed and consulted literature and databases focused on Orange County, California, including the California Natural Diversity Database (CNDDB) and the U.S. Fish and Wildlife Service (USFWS) Critical Habitat database. The CNDDB is a California Department of Fish and Wildlife (CDFW) species account database that inventories status and locations of rare plants and wildlife in California. The CNDDB was used to identify any sensitive plant communities and special status plants and wildlife that have potential to occur within the Project site.

The USFWS's online service for information regarding Final Critical Habitat designation within California was reviewed to determine if the Study Area is within any species' designated Critical Habitat. The USFWS regulatory mapping process for the designation of critical habitat is an imprecise, broad-based, mapping exercise of areas that may or may not include constituent elements of the critical habitat designation. Due to this approach in mapping, large areas are designated as critical habitat regardless of the existing habitat, and as a result may include developed areas, such as buildings, roads, hardscape, and other such facilities, as well as natural habitats.

2.1.1 Plant Community Mapping

Plant communities were mapped in the field directly onto a 200-scale (1" = 200') focusing on dominant plant species. Plant species were identified using plant field and taxonomical guides, such as The Jepson Manual: Vascular Plants of California, second edition (Baldwin et al. 2012). Vegetation communities were characterized utilizing vegetation alliances in accordance with The Manual of California Vegetation, Second Edition (MCVII) (Sawyer et al. 2009). Where necessary, deviations were made on best professional judgment when areas did not fit into a specific habitat description provided by MCVII. After completing the fieldwork, the plant community polygons were digitized using Geographic Information System (GIS) technology to calculate acreages.

2.2 Orange County Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP)

The Orange County Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP) was prepared in cooperation with CDFW and USFWS. The NCCP/HCP focus' on creating a multiple-species, multiple-habitat subregional Reserve

System and implementing a long-term adaptive management program that will protect coastal sage scrub and other habitats and species located within the CSS habitat mosaic, while providing for economic uses that will meet the social and economic needs of the people of the subregion.

The primary goal of the NCCP/HCP is to protect and manage habitat supporting a broad range of plant and animal populations. To accomplish this goal, the NCCP/HCP creates a subregional habitat Reserve System and implements a coordinated program to manage biological resources within the habitat reserve.

2.3 Jurisdictional Waters

The Project site was assessed for jurisdictional Waters of the United States (U.S.) and Waters of the State. To determine the presence of a wetland, three indicators are required: (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. The methodology published in the *U.S. Army Corps of Engineers 1987 Wetland Delineation Manual* and the *Arid West Supplement* sets the standards for meeting each of the three indicators, which normally require that 50 percent or more dominant plant species typical of a wetland, soils exhibiting characteristics of saturation, and hydrological indicators be present.

Additionally, jurisdiction over non-wetland Waters of the U.S. is typically determined through the observation of an Ordinary High Water Mark (OHWM), which is defined as the "line on the shore established by the fluctuation of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas." Projects with impacts to Waters of the U.S. are regulated under Sections 401 and 404 of the Clean Water Act.

Waters of the State are regulated by the California Department of Fish and Wildlife (CDFW) through Section 1600 et seq. of the California Fish and Game Code. The limits of Waters of the State are defined as the "body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." Therefore, the limits extend from the channel bed to the top of the bank, with the addition of the canopy of any riparian habitat associated with the watercourse.

3.0 Results

3.1 Biological Results

CSLS Biologist conducted a general biological survey within the Project site and surrounding 300-foot buffer, collectively referred to as the Study Area, on July 6, 2026. The survey was performed between 7:00 a.m. and 8:00 a.m. The temperature was 68° F during the field survey, with clear skies. Any inaccessible or restricted areas were surveyed using binoculars. The vegetation, trees, jurisdictional waters, and wildlife observed were documented. Representative photographs of the Study Area are included in Attachment A.

3.1.1 Vegetation Communities

The Project site is a developed lot and composed entirely of developed community (office/commercial buildings and parking lot) with scattered ornamental species in the parking lot and frontage of the building (Figure 4). A description of the vegetation community is found below.

Developed

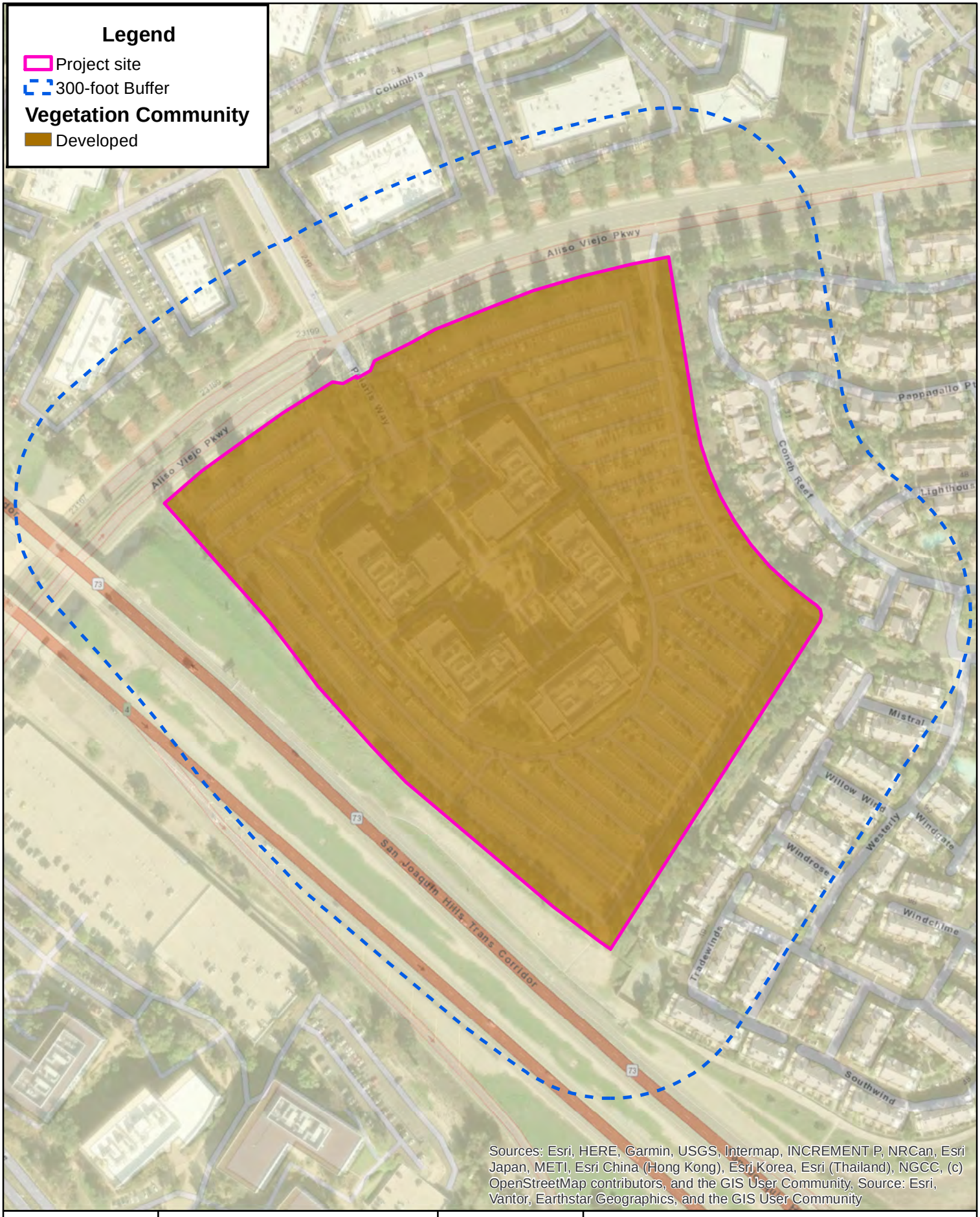
The entire Project site is developed with five existing office buildings and associated parking lots. Buildings 1, 3, and 5 are 3-story office buildings and Buildings 2 and 4 are 4-story office buildings. Vegetation within this community include glossy privet (*Ligustrum lucidum*), carrotwood tree (*Cupaniopsis anacardioides*), crimson fountain grass (*Pennisetum setaceum*), Peruvian peppertree (*Schinus molle*), pine tree (*Pinus spp.*), and Chinese elm (*Ulmus parvifolia*). This community includes the ornamental landscape slope and parking lot islands.

3.1.2 Special Status Plant and Wildlife Species

The Project site contains no special-status vegetation type listed by the CNDDB and CDFW. Due to the developed environment of the Project site, it does not contain any suitable habitat for special status plants or wildlife. Several sensitive wildlife species were reported in the vicinity of the Project site based on the CNDDB and within the quadrangle search. No special status wildlife was identified or observed within the Project site during the field survey.

3.1.3 Critical Habitat

The Study Area is not located within any designated critical habitat. The closest mapped critical habitat occurs approximately 2.72 miles to the south for the thread-leaved brodiaea (*Brodiaea filifolia*) (Figure 5). The Project site does not contain any suitable habitat for these species.



GIS Prepared By:
Carlson SLS

July 2026

0 25 50 100 150 200 250 300 350 400 450 500 Feet

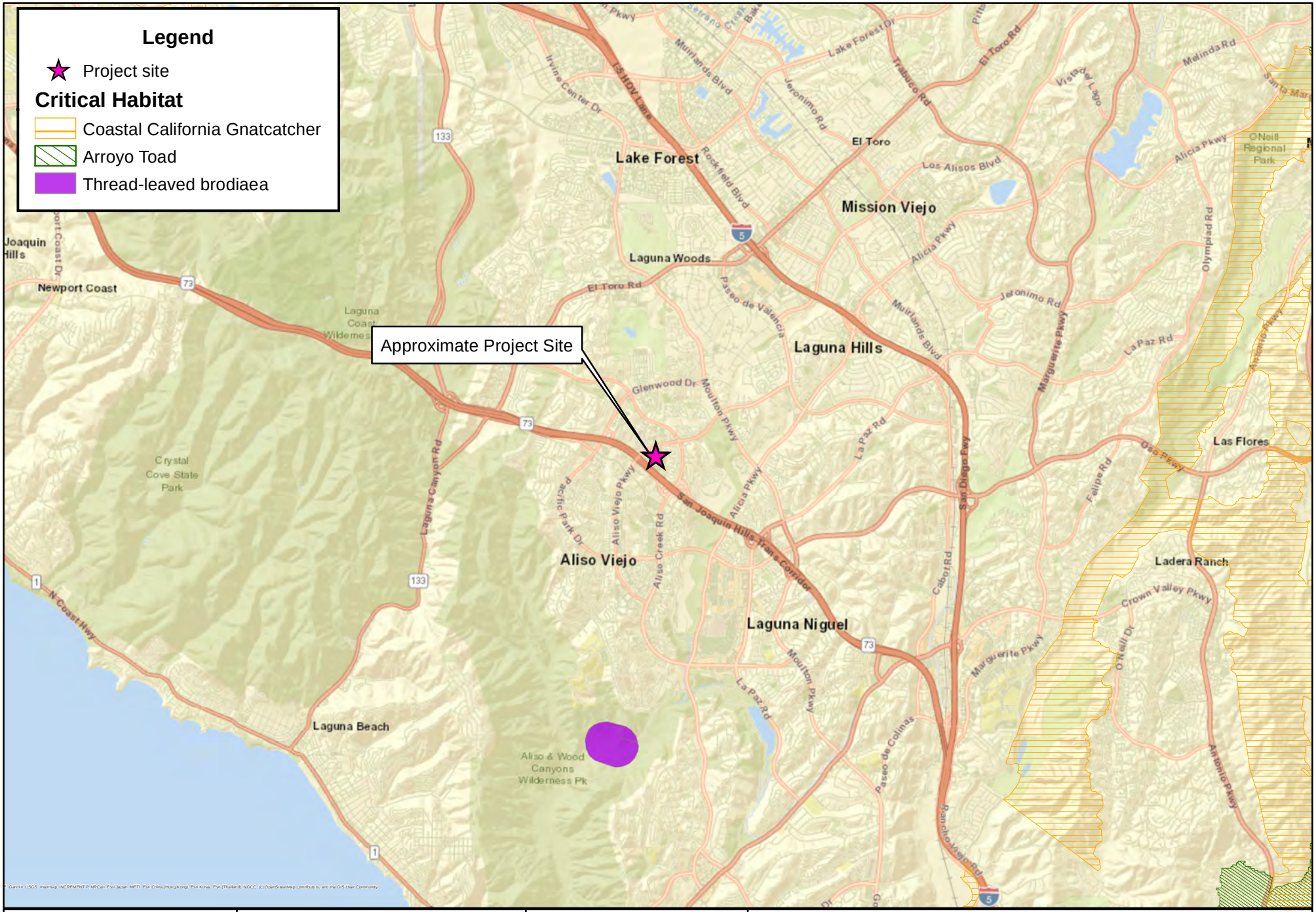
1 inch = 250 feet

Data Source: Bing Maps

Polaris Place Project

Vegetation Map

FIGURE 4



GIS Prepared By:
Carlson SLS

July 2026

0 1,625 3,250 6,500 9,750 13,000 Feet

1 inch = 6,500 feet

Data Source: CNDDB (07/2026)
CH (03/2015)

Polaris Place Project

Critical Habitat

FIGURE 5

3.1.4 Wildlife Species

The Project site is located along a busy corridor along Aliso Viejo Parkway and SR-73. Due to this wildlife species observed onsite was low during the survey and consisted primarily of species accustomed to urban settings. Observed species include American crow (*Corvus brachyrhynchos*), Anna's hummingbird *(Calypte anna),* song sparrow (*Melospiza melodia*), and mourning dove (*Zenaida macroura*).

3.2 NCCP/HCP

Portions of the City lie within the Coastal subregion of the Orange County Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP); however, the Project site is not located within or adjacent to designated Non-Reserve Open Space or NCCP Habitat Reserve within the NCCP/HCP. The Project site is currently developed and located within an urbanized area and is not located within the boundaries of the NCCP/HCP reserve system.

3.3 Jurisdictional Waters

Based on the literature review and USGS quadrangle topographic map, no blue line drainages were mapped on the Project site. During the field survey, the biologists paid special attention for any drainages meeting the regulatory definitions of waters.

The Project site is a developed condition with three, two story office/commercial buildings, associated parking lot, and scattered ornamental vegetation. Based on the field survey, there are no features identified on the Project site that meet the definition and are considered jurisdictional Waters of the United States or Waters of the State, pursuant to Section 1600-1603 of the California Fish and Game Code and Section 401 and 404 of the Clean Water Act, respectively.

4.0 Impacts

With the implementation of the Project would impact the entire Project site area (Figure 3).

4.1 Biological Results

4.1.1 Vegetation Communities

Development of the Project site would result in the direct removal of non-native species and hardscape, including buildings and parking lot. No special status or sensitive plant species were identified to occur onsite, nor were they observed onsite. The Project site is developed with some ornamental species. The Project would include the removal of

non-native ornamental species, which are abundant in the area; therefore, impacts would not be considered a significant impact and no mitigation is required.

4.1.2 Sensitive Wildlife Species

Development of the Project site would result in the disruption and removal of potential nesting habitat in the form of buildings, ornamental trees, and shrubs. Due to the built nature of the site, the busy intersection, and development within the vicinity (e.g., nearby commercial buildings), these impacts would not be expected to reduce the general wildlife populations below self-sustaining levels within the region and impacts to non-sensitive wildlife species do not meet the significance thresholds. Therefore, impacts to common wildlife species would not be considered a significant impact and no mitigation is required.

The Project site consists of developed habitat and lacks suitable habitat for sensitive wildlife species. The Project site provides limited suitable habitat for some common avian species in the form of ornamental species and existing building eaves. While none of the common species carry a Federal or State listing as threatened or endangered, they are all protected under the Migratory Bird Treaty Act (MBTA). Therefore, a pre-construction survey is required in compliance with the MBTA. Implementation of Mitigation Measure (MM) BIO-1 would reduce potential impacts to the avian species to a less than significant level, if nesting individuals are present.

MM BIO-1 *Prior to the issuance of any grading permit that would impact potentially suitable nesting habitat for avian species, the project applicant shall adhere to the following:*

1. *Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to the extent feasible to avoid potential impacts to nesting birds and/or ground nesters.*

2. *Any construction activities that occur during typical nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) will require that all suitable habitat, on-site and within 300-feet surrounding the site (as feasible), be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement ground disturbances. If active nests are identified, the biologist would establish buffers around the vegetation (500 feet for raptors and sensitive species, 200 feet for non-raptors/non-sensitive*

species). All work within these buffers would be halted until the nesting effort is finished (i.e. the juveniles are surviving independent from the nest). The onsite biologist would review and verify compliance with these nesting boundaries and would verify the nesting effort has finished. Work can resume within these areas when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.

4.1.3 Wildlife Corridor

The Project site is surrounded by commercial buildings and does not function as a wildlife corridor. Furthermore, the Project site located on a busy intersection with consistent traffic and noise further deterring the use of the site as corridor. As such, no impacts would occur, and no mitigation is required.

4.2 Local Ordinances or Policies

The City does not have any local policies, such as a tree preservation ordinance, which protects biological resources. In addition, the Project site consists primarily of the disturbed/developed habitat community, with the western site boundary consisting of a landscaped slope with groundcover, shrubs, and trees. Therefore, no impacts would occur, and no mitigation is required.

4.3 Adopted Habitat Conservation Plan

Portions of the City lie within the Coastal subregion of the Orange County Natural Community Conservation Plan and Habitat Conservation Plan (NCCP/HCP); however, the Project site is not located within or adjacent to designated Non-Reserve Open Space or NCCP Habitat Reserve within the NCCP/HCP. The Project site is currently developed and located within an urbanized area and is not located within the boundaries of the NCCP/HCP reserve system. Therefore, no impacts would occur, and no mitigation is required.

4.4 Jurisdictional Features

No jurisdictional features occur on the Project site that meet the definition and are considered jurisdictional Waters of the United States or Waters of the State, pursuant to

Section 1600-1603 of the California Fish and Game Code and Section 401 and 404 of the Clean Water Act, respectively. Therefore, no impacts would occur, and no mitigation is required.

5.0 Summary

The Project site consists of five, four- and five- story office buildings on a developed lot with scattered ornamental trees and shrubs. The Project site does not contain sensitive habitat or suitable habitat for sensitive species.

While the site is developed, the building and scattered ornamental species could provide suitable nesting habitat for avian species. Due to the suitable habitat, direct impacts could occur to nesting birds should construction activities and ground disturbances begin during the typical nesting season. However, adherence and implementation of MM BIO - 1 will ensure impacts to avian species or their habitats are minimized thus reducing the Project's impact to less than significant.

The Project site does not fall within the Orange County NCCP/HCP boundary. While the City does have an ordinance for trees, the Project does not meet the purpose or intent of the ordinance. However, the Project does propose landscaping as part of the final design.

No jurisdictional features are present onsite.

Please contact me at bbernard@carlsonsls.com or 916.218.2644, should you have any questions or comments.

Brianna Bernard
Project Manager

Enclosures:

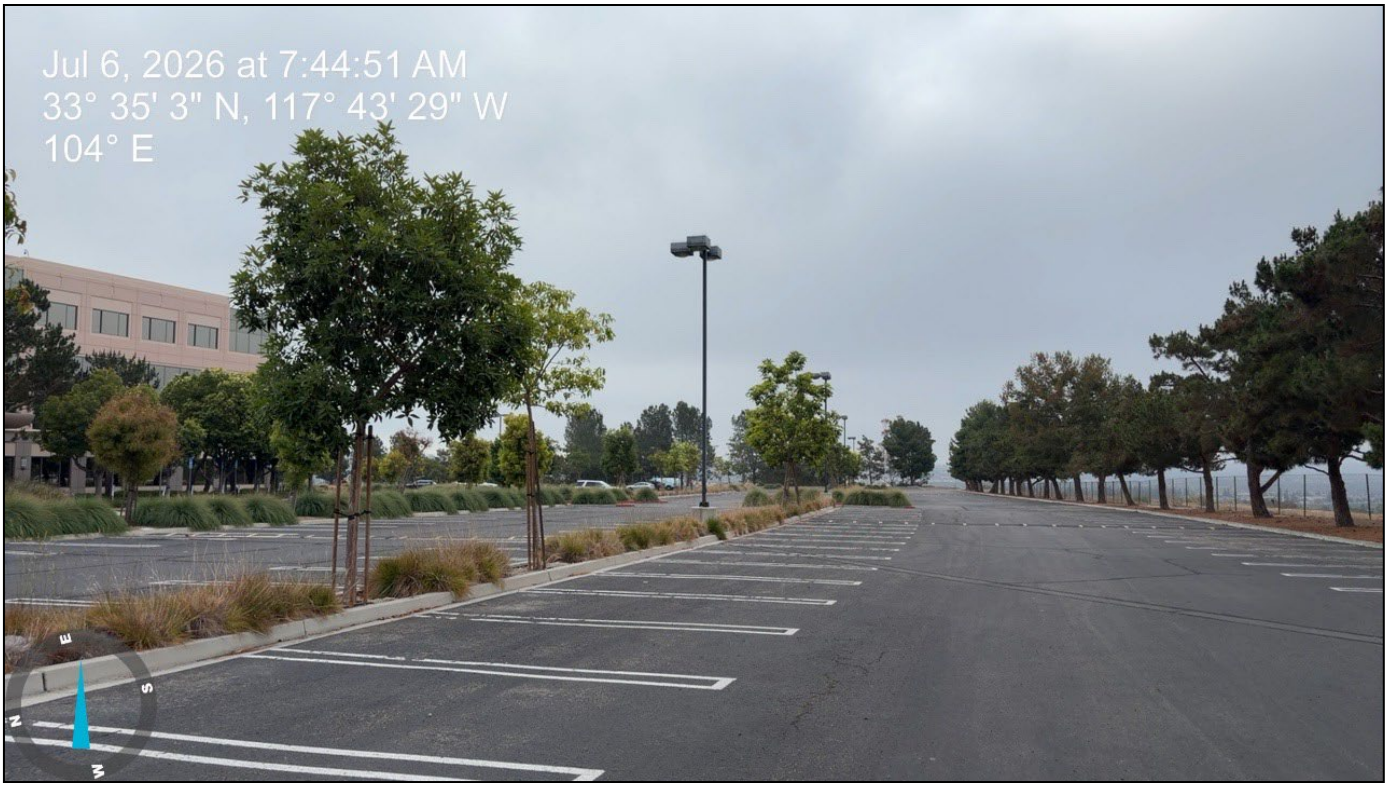
- Attachment A: Representative Photographs

Attachment A

Representative Photographs

The Project site consists of existing buildings and associated parking lot.

The parking lot is asphalt with ornamental species.



Vegetation onsite include common ornamental species.

The Project site includes existing buildings.

Ornamental species were observed in the parking lot islands.

Looking southeast across the Project site.