

Memorandum

Date: May 12, 2026

To: Orange County Development Company LLC. VP of Development c/o
Danielle Prigmore, Shea Homes

From: Brianna Bernard

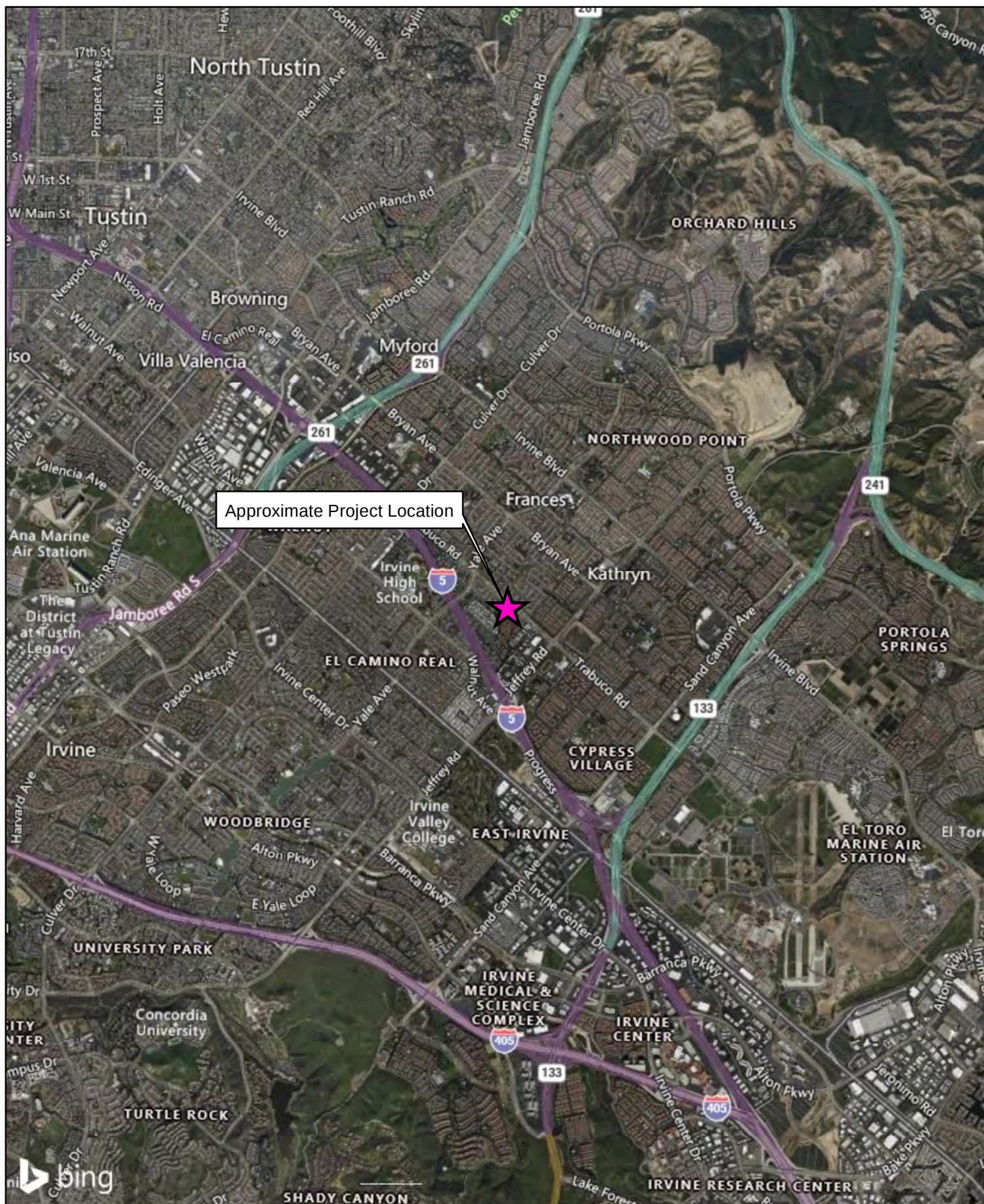
Subject: Biological Resource Assessment for Our Lady of Peace Korean Catholic
Church Project in the City of Irvine

Carlson Strategic Land Solutions (CSLS) prepared this Biological Resource Assessment memorandum and graphics documenting the finding of a field review for potential sensitive plants and wildlife for the Our Lady of Peace Korean Catholic Church Project (Project) located in the City of Irvine. In support of Project efforts CSLS biologist, Brianna Bernard, conducted an analysis of the biological resources onsite on April 11, 2024. This memorandum provides the results of the site visit.

1.0 Project Location and Description

The Project site includes the Our Lady of Peace Korean Catholic Church, paved parking lot, and unpaved parking lot/disturbed area located at 14010 Remington in the City of Irvine (**Figures 1 and 2**). The approximately 6-acre Project site is surrounded by residential uses to the north, east, south and west.

The Project proposes to construct a new Church main building, a Parish Hall, and a Rectory building, with associated parking on the northern portion of the Project site. Furthermore, the Project proposes to construct residential units on the southern portion of the Project. The proposed Site Plan is provided on **Figure 3**.



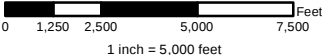
GIS Prepared By: Carlson SLS Created: April 16, 2024	 	Data Source: Bing Maps	<i>Our Lady of Peace Korean Catholic Church Project</i> Regional Location Map
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FIGURE 1

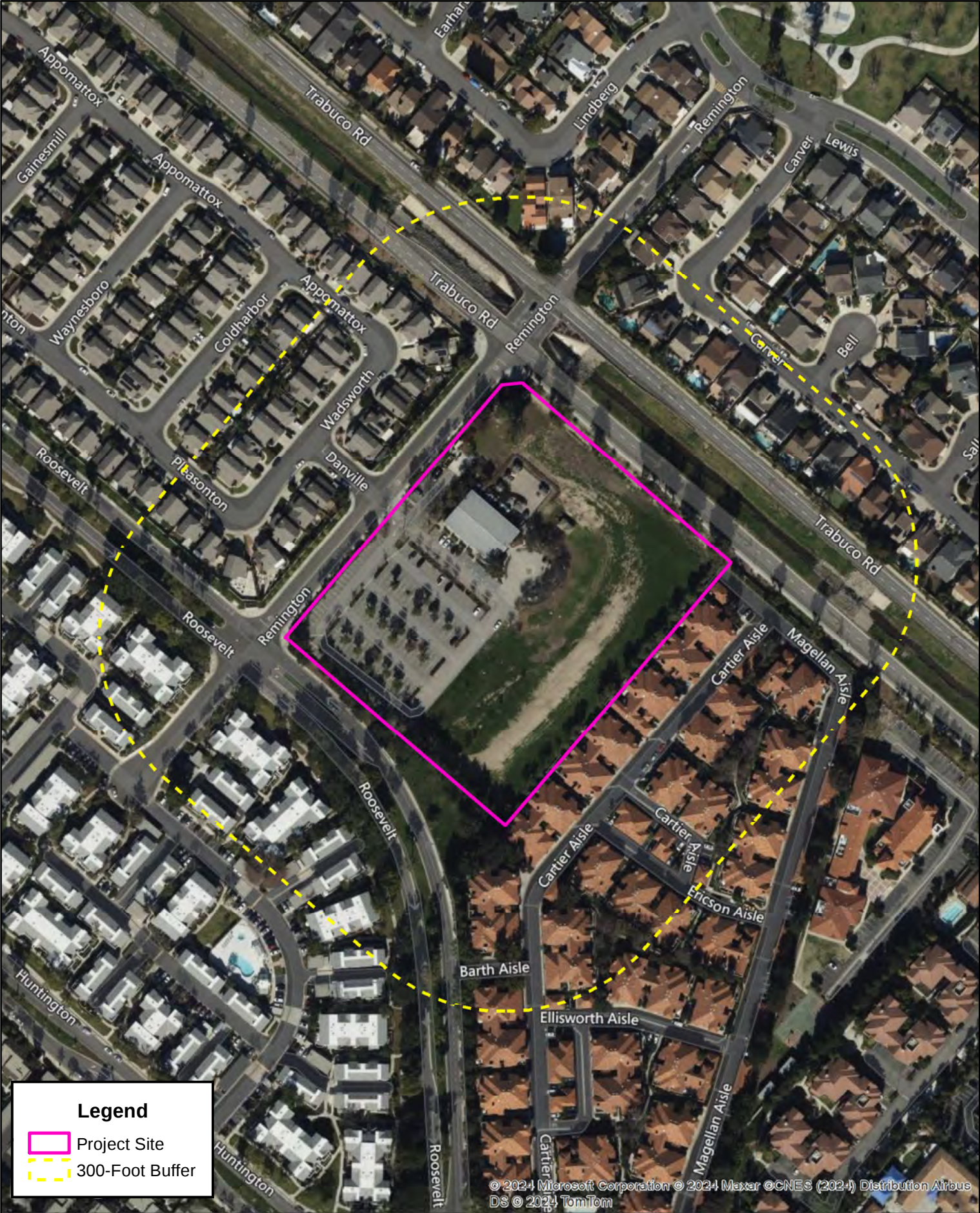


FIGURE 2

Site Summary :

Total Homes : 68

Site Area (Church) : ± 3.06 Acres
Site Area (Residential) : ± 2.94 Acres

Density : ± 23.1 Homes per Acre

3-STORY TOWNHOMES
OCCUPANCY R-2/U
1-HOUR FIRE PARTITIONS BETWEEN UNITS IN ACCORDANCE
WITH SECTION 708 AND HORIZONTAL ASSEMBLIES IN
ACCORDANCE WITH SECTIONS 711 (C.B.C. SECTIONS 420.2, 420.3)

TYPE V-B CONSTRUCTION WITH NFPA 13 SPRINKLER SYSTEM PER
C.B.C 903.3.1.1.

Plan 1 - 1,344 SF
Plan 2 - 1,466 SF
Plan 3 - 1,910 SF
Plan 3X - 1,878 SF

Parking Required:	
1.6 Spaces / 2BR x 26	: 41.6
2.0 Spaces / 3BR x 42	: 84
0.25 Spaces / Unit x 68	: 17
Total Required	: 142.6
	: 143 (2.1:1)

Parking Provided:	
Garage Spaces	: 136
Uncovered Spaces	: 9
Total Provided	: 145 (2.13:1)

Church Spaces	: 206
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Landscape Coverage:

Residential Required: 30% of site area	: ±38,400 SF
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Provided*	: ±21,868 SF (17.1%)
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Church Required: 15% of site area	: ±20,002 SF
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Provided:	: ±36,587 SF (27.4%)
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Total Required	: ±58,402 SF
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Total Provided	: ±58,455 SF
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Figure 3

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 (CNDDDB) and the U.S. Fish and Wildlife Service (USFWS) Critical Habitat database. The CNDDDB 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 CNDDDB 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. Additionally, the Information for Planning and Consultation (IPaC) database from the USFWS was reviewed, which generates a list of federally sensitive species and other resources, such as critical habitat, that are known or expected to be on or near the Project site. The search was utilized to determine the likelihood a Project may have impacts on federally sensitive species onsite with Project implementation.

2.1.1 *Vegetation Community and Land Cover Mapping*

Vegetation communities and land cover 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 City of Irvine Tree Ordinance

The City establishes regulations and standards for parking lot trees and boundary trees as outlined in the City of Irvine's Municipal Code (Chapter 3-15-4 and Chapter 3-15-5). Per the City's Municipal Code the intent is to preserve the trees that provide shading

throughout parking areas and reduce the amount of heat absorbed, while providing aesthetics. Per the City's Municipal Code removal of parking lot trees and boundary trees are required to obtain a tree removal permit. Furthermore, tree distribution within parking areas is to provide one 15-gallon canopy tree for every uncovered parking space. Boundary trees which shade the parking area may count towards the fulfillment of parking lot trees. Two boundary trees shall equal one parking lot tree. Those trees observed in the public right-of-way are not included in the calculation.

2.3 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 focuses 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.

The Project site is not mapped within the boundary of the Orange County NCCP/HCP. Therefore, no impacts would occur, and no mitigation is required.

2.4 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 April 11, 2024. The survey was conducted between 9:15 a.m. and 10:15 a.m. The temperature was 67° 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.

The Project site is currently occupied and operated by the Our Lady of Peace Korean Catholic Church. The Our Lady of Peace Korean Catholic Church congregants meet regularly on the campus and is staffed full time. The building perimeter was surveyed to evaluate bat presence, identify potential bat day-roosting habitat, and signs of other cavity nesting wildlife. The building was visually examined for evidence of cavity nesting wildlife and bat use (e.g., presence of guano, evidence of day roost use, culled insect parts, urine staining, odors associated with bats, bird droppings, etc.). No indicative signs were observed and it was determined additional surveys for bats were not warranted.

Representative photographs of the Study Area are included in **Attachment A**.

3.1.1 Vegetation Communities and Land Cover

The Project site is a developed lot with a church building and associated parking lot. The site is of developed community with scattered ornamental species in the parking lot and frontage of the building, ornamental habitat, and disturbed habitat (**Figure 4**). The Project site contains no special-status vegetation type listed by the CNDDB and CDFW. A description of the vegetation communities are found below.

Table 1. Onsite Vegetation

Vegetation Community and Land Cover	Acreage
Disturbed	3.32
Ornamental	0.15
Developed	2.53
TOTAL	6.00

Disturbed

The portion located to the northeast of the building is a large disturbed area that is currently being used as overflow parking. Vegetation within this community includes mouse barley (*Hordeum murinum*), bristly ox-tongue (*Helminthotheca echioides*), cheeseweed (*Malva parviflora*), summer mustard (*Hirschfeldia incana*), lemon scented eucalyptus (*Corymbia citriodora*), carrotwood (*Cupaniopsis anacardioides*), castor bean (*Ricinus communis*), date palm (*Phoenix dactylifera*), bougainvillea (*Bougainvillea spp.*), and vinegar trees (*Lophostemon confertus*). This area is mowed regularly and utilized as overflow parking for the church.

Ornamental

The southwest portion of the Project site contains ornamental species. The trees within this community include typical non-native ornamental species such as Monterey pines (*Pinus radiata*).

Developed

The Project site is developed with a church building with accessory buildings. Several portables occur to the north east of the main church building. To the southwest of the main building is an asphalt-paved parking lot and associated parking lot landscaping. Vegetation within this community include typical landscaped trees and shrubs such as Indian hawthorne (*Rhaphiolepis indica*), African iris (*Dietes bicolor*), Japanese pittosporum (*Pittosporum tobira*), vinegar tree, Brazilian peppertree (*Schinus*

terebinthifolia), London plane (*Platanus × acerifolia*), bougainvillea, glossy privet (*Ligustrum lucidum*), and creeping juniper (*Juniperus horizontalis*).

3.1.2 Special Status Plant and Wildlife Species

Due to the developed environment of the Project site, it does not contain any suitable habitat for special status plants or wildlife. No sensitive wildlife species was reported as occurring on the Project site based on the CNDDDB. No special status wildlife were identified or observed within the Project site during the field survey.

3.1.3 Observed Wildlife Species

The Project site is located along a busy corridor along Trabuco Road. Due to this, few wildlife species were observed onsite during the survey. Species detected consisted primarily of those accustomed to urban settings, including Allen's hummingbird (*Selasphorus sasin*), barn swallow (*Hirundo rustica*), European starling (*Sturnus vulgaris*), rough-necked swallow (*Stelgidopteryx serripennis*), American crow (*Corvus brachyrhynchos*), black phoebe (*Sayornis nigricans*), Anna's hummingbird (*Calypte anna*), house finch (*Haemorhous mexicanus*), song sparrow (*Melospiza melodia*), and mourning dove (*Zenaida macroura*).

3.1.4 Observed Special Status Plant Species and Vegetation Communities

The Project site does not include habitat for any special status plants. Additionally, no special status plants were observed onsite during the survey.

Furthermore, a CNDDDB search within the Tustin USGS topographic quadrangle found a single sensitive special status vegetation community designated by CDFW. This community is the Southern Coastal Salt Marsh. The Project site does not include the southern coastal salt marsh. No vegetation species associated with the southern coastal salt marsh occur on the Project site.

3.1.5 Wildlife Corridor

The Project site is characterized by exposed areas that lack suitable cover (disturbed/developed land covers) and resources that are typically associated with wildlife movement areas (i.e. water). Furthermore, the Project site is surrounded by residential development to the west, east, and south, is actively used by church attenders regularly, and is adjacent to Trabuco Road, located to the north, which is a busy street with consistent traffic and noise, further restricting any wildlife movement.



FIGURE 4

3.2 Jurisdictional Waters

Based on the literature review and USGS quadrangle topographic map, no drainages, mapped as a blue line on the topographic map and represents a natural drainage path, were mapped on the Project site. During the field survey, biologists paid special attention for any drainages meeting the regulatory definitions of waters of the US and waters of the State. While a formal wetland delineation was not conducted and no wetland pit test were performed, no indicators of waters of the US or State were observed.

The Project site is a developed condition with a church building, associated paved parking lot and a large, disturbed area used as overflow parking. 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 as outlined within **Figure 3**, the entire Project site will be directly impacted with the construction of the Project. Additionally, indirect impacts to areas surrounding the Project site, within 300-feet, were analyzed below.

4.1 Biological Impacts

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 as identified in **Table 2** below. No direct or indirect impacts would occur to vegetation communities or land cover within the surrounding 300-feet. The direct impacts to the Project site vegetation communities and land cover are due to the demolition, grading, and construction of the Project as outlined within **Figure 3**.

Table 2. Onsite Vegetation Impacts

Vegetation Community and Land Cover	Acreage
Disturbed	3.32
Ornamental	0.15
Developed	2.53
TOTAL	6.00

No special status or sensitive plant species were observed onsite. Therefore, no impacts to sensitive vegetation would occur.

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 street, and development within the vicinity (e.g., nearby neighborhood), 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) and Fish and Game Code (FGC) 3503. Under Fish and Game Code 3503, it is unlawful to take, possess, or destroy nest or eggs of any bird. Therefore, a pre-construction survey is required in compliance with the MBTA and FGC. Implementation of **Standard Condition SC BIO-1** which is proposed to ensure that activities affecting potential nesting habitat are restricted to periods outside of the avian breeding season or, where activities must occur, pre-activity surveys and avoidance measures are implemented. **SC BIO- 1** would ensure avoidance of direct impacts associated with vegetation removal or indirect impacts associated with construction related noise impacts for avian species covered under the MBTA and FGC during the typical nesting bird season. The Project would be required to adhere to federal and state regulations. Impacts would be less than significant.

SC 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 15 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 on the Project site, 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 has the discretion to determine the size of an appropriate no-work buffer based on species/active nest observed. The reduced buffer determined by nesting species, would be monitored and a monitoring plan would be submitted 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 residential development, is characterized by exposed areas that lack suitable cover (disturbed/developed land covers) and lacks resources that are typically associated with wildlife movement areas (i.e. water). Furthermore, the Project site is adjacent to Trabuco Road, a busy street with consistent traffic and noise. Therefore, the Project site does not function as a wildlife corridor. As such, no impacts would occur, and no mitigation is required.

4.2 Local Ordinances or Policies

While the City has a tree ordinance, the purpose of the ordinance is to regulate the removal and destruction of trees from Public right-of-way and provide shade for parking areas. Landscaping plans for the proposed construction of the parking lot shall adhere to the City's tree ordinance. All tree removal from any right-of-way or trees that were provided for the parking lot that are anticipated to be removed shall comply with the City ordinance and obtain a tree removal permit. Furthermore, the Project shall comply with the installation of shade trees for the parking lot as outlined within the City's Municipal Code Chapter 3-15-4 and Chapter 3-15-5. Additionally, ornamental trees or

native trees, can provide suitable nesting habitat and roosting areas for avian species. Should tree removal occur during the typically nesting season there is potential for disruption of nesting activity, if nests occur in the proposed removed tree. With the compliance of the City Ordinance and **SC BIO-1**, impacts are less than significant and no mitigation is required.

4.3 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 a church building, accessory buildings, and a developed parking lot with ornamental trees and shrubs. The southeastern portion of the Project site consists of a disturbed area that is utilized for overflow parking and was generally void of vegetation. 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. None of the common species with potential to occur in these habitat are listed as federally or state threatened or endangered species (or candidates for listing), they are all protected under the MBTA and FGC 3503. Therefore, in compliance with the MBTA and applicable FGC regulations, **Standard Condition SC BIO-1** shall be implemented, which ensures that construction activities with potential to impact nesting avian species are restricted to periods outside of the breeding season of these species or, where such activities must occur, pre-activity surveys and avoidance measures are implemented.

The City does have current ordinances that govern removal of trees (Section 5-7-401 [Urban Forest Ordinance], and Section 5-7-401 [Tree Removal Ordinance]) and the Project would comply with these ordinances in regard to removal of any right-of-way tree and parking lot tree removal and provide appropriate replacement trees as outlined within the City's Municipal Code Chapter 3-15-4 and Chapter 3-15-5. Additionally, since the trees may provide suitable nesting habitat and roosting areas, **SC BIO-1** is to be implemented. With the compliance of the City Ordinance and **SC BIO-1**, impacts are less than significant and no mitigation is required.

The Project site does not fall within the Orange County NCCP/HCP boundary, therefore there is no impact and no mitigation required.

No jurisdictional features are present onsite, therefore there is no impact and no mitigation required.

Please contact me at bbernard@carlsonsls.com or 949.542.7042, should you have any questions or comments.

Brianna Bernard
Project Manager

Enclosures:

- Attachment A: Representative Photographs

Attachment A

Representative Photographs



Looking north from the parking lot towards the main church building.



The parking lot consists of asphalt with ornamental species.



Looking south over the disturbed area where overflow parking occurs.



Looking northwest over the disturbed area along the north side of the main church building.



Looks west at the main building and accessory buildings.



Looking east at the main church building.



Looking south over the parking lot.



Looking north east towards the main church building from the parking lot.