Exhibit C

This page intentionally left blank.

2022

Regan Biological & Horticultural Consulting

Patrick Regan

[NASTA/AGARWAL RESIDENCE BIOLOGICAL ASSESSMENT]

Evaluation of Biological resources at 30950 Aurora Del Mar, Carmel highlands, California

Puneet Agarwal and Aarti Nasta propose to do a significant remodel and expansion of their existing 3,264 square foot home at 30950 Aurora Del Mar in the Carmel Highlands area of Carmel California.

Proposed Scope of Work: Remodel of the existing home to 5,016 square feet, working off the existing footprint/framing substantially with additions selectively to the ground floor and the addition of a new partial second floor. •Update the home to current standards of Energy/Green Building Compliance as well as Building Code Health and Safety

- Addition of a bedroom to create a 4-bedroom home
- Addition of support spaces such as an office, exercise, and kid (family) rooms
- Relocation of the primary bedroom suite to a new partial second floor to have ocean views

• Redesign the existing garage/location to de-emphasize the current visual prominence of the garage.

• Redesign for better indoor/outdoor relationship with courtyard/patio usability to enjoy the outdoor environment

The property is within the Soberanes Point Quadrangle of the USGS and under the Local Big Sur Coastal Land Use Plan of the California coastal Act. Applications for development permits require a biological assessment of the subject property to determine the biological resources of the site, evaluate the possibility of impacts to these potential resources because of the development and provide mitigation measures to reduce these potential impacts to a less than significant level.

On July 2, 2022, I visited the proposed project site. I surveyed the entire property for special status plant and animal species as well as plant communities. Before my visit I queried the California Natural Diversity Database (CNDDB) for special status species (Considered rare, threatened or endangered by one or more local, state or Federal agencies) and the California native plant society's Rare Plant Inventory database (CRPR) for rare plant species that have been documented within the Soberanes Point quadrangle of the USGS. The query returned a total list of 20 species of plants (12 mapped on attached appendix) from the CNDDB, and 19 from the CRPR and 12 species of animals including insects, and two unique plant communities. The plants on the list include: California screw moss (Tortula californica), Hooker's manzanita (Arctostaphylos hookeri ssp. hookeri), Little sur manzanita (Arctostaphylos edmundsii) Jolon clarkia (Clarkia jolonensis), Hutchinson's larkspur (Delphinium hutchinsoniae), Pinnacles buckwheat (Eriogonum nortonii), seaside bird's-beak (Cordylanthus rigidus ssp. littoralis), maple-leaved checkerbloom (Sidalcea malachroides), Monterey pine (Pinus radiata), Yadon's rein orchid (Piperia yadonii) and pine rose (Rosa pinetorum). Animal species include California red-legged frog (Rana draytonii), ashy storm-petrel (Oceanodroma homochroa), steelhead - south/central California coast DPS (Oncorhynchus mykiss irideus), Smith's blue butterfly (Euphilotes enoptes smithi) and monarch butterfly (Danaus plexippus). Inclusion on this list is no guarantee of presence on the project site, but it does help in preparation for site surveys to know what to expect. In the same way, species that are not found on the list but have potential to occur in this region or habitat type are not excluded from potential occurrence.

Due to the specific elevation, location on a bluff over the ocean and habitat type it is possible to eliminate a number of these species immediately. Aquatic animal species like the Steelhead, Black abalone, and red legged frog are entirely ruled out by lack of key habitat element requirements. Pinnacles buckwheat and Jolon clarkia, among others are limited to significantly higher and dryer sites further inland. A table of plant species from the California rare Plant rank inventory is attached this report showing flowering times and elevation distributions of each species.

Results

The survey date of July 2 is late in the year for many of the plants listed on both the CNDDB and CRPR lists. Flowering periods for at least half of the plants on those lists typically ends before July and in drought years even earlier. However, the level of disturbance to the entire site and lack of remaining suitable habitat for the 95% of the plants rules out most that may have already bloomed out if they had occurred on site.

The Nasta/Agarwal property is 1-acre acre of land that slopes down from East to West toward the Pacific Ocean and drops off steeply from a bluff above the water. The Lot is long and narrow running generally northeast to southwest. The topography gently slopes from about 75-foot elevation at the driveway entrance down to about 45 feet at the existing home. The lot is lined on both the North and South by planted Monterey Cypress trees of varying ages. Between these two screening hedges is the driveway running due west, the house and extensive garden and hardscape occupying most of the useable land on site.

The native vegetation typical in this area is Coastal or bluff top scrub dominated by native buckwheat (*Eriogonum parvifolium*), lizard tail (*Eriophyllum staechadifolium*), coast sagebrush (*Artemisia californica*), false heather (*Ericameria ericoides*), California coffeeberry (*Frangula californica*) and Carmel Ceanothus (*Ceanothus thyrsiflorus variety griseus*). But, aside from a few scattered plants remaining on the bluff over the ocean, no intact native plant community was found anywhere else on the property. I surveyed the property from

corner Figure 1: View looking west toward existing house from driveway entry. no naturally occurring native species within view.

driveway enters, and west to the house and around it to the Ocean bluff. The entire site has historically been altered

from native conditions to include significant exotic landscape plantings throughout, primarily succulents and other drought resistant selections from around the world. Native

the SE

where





Figure 2: View of Southern end of existing house. native Monterey paintbrush plant in landscape in shade of eve overhang at corner in middle of photo.

species are few and very far between aside from the planted Monterey Cypress, and a Couple Ceanothus garden cultivars in the landscape I saw only one small patch of native Douglas' Iris along the Southside of the driveway and a single plant of Monterey Paintbrush (this is local indigenous species on the CRPR list 4.2) in a garden area next to the SE corner of the house. Monterey Cypress is found in native occurrences on Point Lobos, about 2.5

miles north of the Nasta/Agarwal property but the trees planted here are not a natural occurrence.

The Ocean bluff in the Scenic easement west of the existing house contains mostly introduced nonnative succulent species including the highly invasive "ice Plant" - Carpobrotus edulis but does have a few remaining native species including Carmel Ceanothus – *Ceanothus thyrsiflorus* variety *griseus*, Bluff lettuce – *Dudleya caepitosa*, California sagebrush – *Artemisia californica*, and Seacliff buckwheat – *Eriogonum parvifolium*. The Seacliff buckwheat is a host plant for the endangered Smith's Blue butterfly – *Euphilotes enoptes smithii* which is endemic to the Monterey county coast and documented in several nearby locations within the Soberanes Point quadrangle. The few scattered plants do not have a great enough contiguous coverage on the bluff to create a suitable breeding habitat for the butterfly and the exposed slope offers no wind protection for the tiny butterflies to be able to utilize the plants. It is extremely unlikely that any Smith's blue butterfly adults utilize the plants on the property for nectaring

or egg laying. The location of the plants is west of the existing house and terrace. The individual Buckwheat plants are surrounded by the native Carmel Creeper (*Ceanothus thyrsiflorus var. griseus*) and several native succulents (*Dudleya caespitosa*) This area is not proposed for any new development and will be protected during construction activity.

Conclusions

The property at 30950 Aurora Del Mar was historically environmentally sensitive Bluff scrub and coastal sage scrub habitat. All that habitat was removed or significantly permanently altered by the construction of the existing house and landscape and



Figure 3: Close up of lone Monterey Paintbrush plant in flower in landscape at corner of house

subsequent remodel and revision to the degree that the background data research turned out to be more significant than the actual onsite biological assessment.

The remodel of the existing house will occur entirely within the previously developed footprint (house, hardscape, and landscape) on the narrow lot. On the inland side of the house, aside from a single plant of the Monterey paintbrush within the construction zone at the southern portion of the house, there will be no impacts to any naturally occurring native plants on the lot and no impacts to any special status native wildlife. The owners may choose to transplant the Monterey paintbrush, which would be best done in the months of October or November, but the removal of a single plant by the remodel project would not have a significant impact.

To avoid potential impacts to the bluff west of the house, exclusionary fencing (orange snow fencing would suffice) should be placed on the inland side of the edge of the native plant zone and no work will be allowed to go beyond it. To offset historical impacts to the property (prior to current owners) after construction is complete, the bluff should be carefully restored to an entirely native plant mix, by removal of exotic planted succulents and weedy Carpobrotus and small leaved ice plant. A restoration plan to address this section of the property as well as past mitigation requirements for areas along the southern property line and the access into the Cove at the SW corner of the property will be prepared under separate cover.



Patrick Regan

Figure 4" View looking north along west facing wall of existing house.

Nasta/Agarwal residence Biological Assessment



Figure 5: Ocean bluff dropping off to high tide line. nonnative Carpobrotus on Left and native Carmel ceanothus on right. This is where remnant native species of the Coastal Bluff Scrub community are invaded by the Carpobrotus and planted nonnative succulents.

Figure 6: View looking west along north side of house and bluff.



Nasta/Agarwal residence Biological Assessment



Figure 7: View looking West along middle north side of house. Older Cypress trees here but not native to site. Figure 8: View looking east along north side of house and landscape. No native vegetation



Appendices

Combined Special status species table

CNDDB occurrence map

CRPR native plant inventory table

References

California Native Plant Society (CNPS). 2022. *Inventory of Rare and Endangered Plants* (online edition, v7-09d). California Native Plant Society. Sacramento, CA. Accessed on July 5, 2022 from <u>http://www.cnps.org/inventory</u>

California Natural Diversity Database March May 2022, Soberanes Point Quad

California Wildlife Habitat Relationships System, March 2000. California Department of Fish and Game California Interagency Wildlife Task Group.

Hayes, Grey F. and Dean W. Taylor, 2006: Rare, threatened and endangered species fact sheets. Elkhorn Slough Coastal Training Program

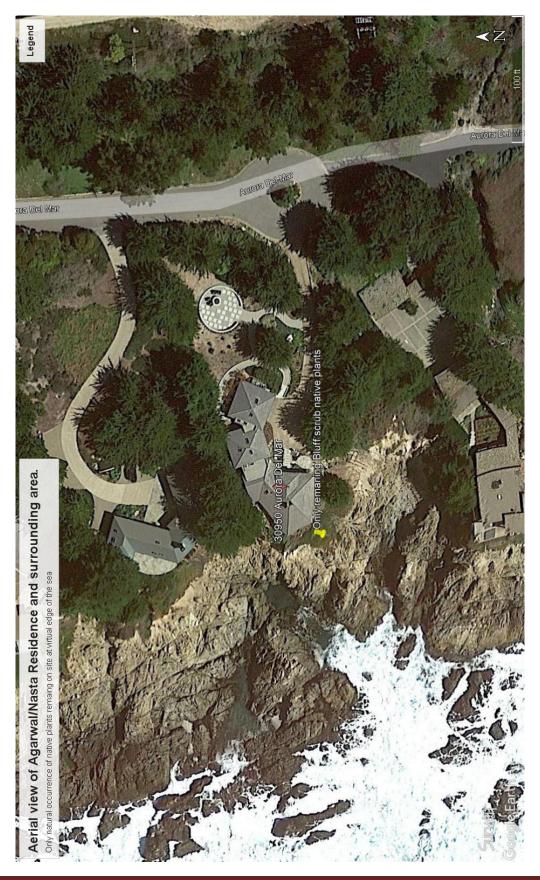
Johnson, Helen 2009. Monitoring Migrating Monarchs in Monterey County. Ventana Wildlife Society

Matthews, Mary Ann, 2006 (revised). *An Illustrated Field Key to the Flowering Plants of Monterey County and Ferns, Fern Allies, and Conifers*, Version 1.1, California Native Plant Society. Monterey CA

Monarch Watch. 2011. Status Report on the Monarch Butterfly (Danaus plexippus) in Canada- Species movement .Monarchwatch.org

Roberson, Don. 2002. Monterey Birds, second edition. Monterey Peninsula Audubon society.

Sawyer, John O., Todd Keeler-Wolf and Julie M. Evens. 2009. *A Manual of California Vegetation Second edition*. California Native Plant Society Press. (Sacramento CA)



This page intentionally left blank