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December 7, 2021

Ms. Stefanie Edmondson  
Senior Planner  
City of Carson  
Community Development-Planning Division  
701 East Carson Street  
Carson, CA 90745

**Subject:** Biological Literature and Database Review Results for the 21611 Perry Street Self Storage Project

Dear Ms. Edmondson:

This letter report documents the results of a California Natural Diversity Database (CNDDDB) and California Native Plant Society's (CNPS) Online Inventory of Rare and Endangered Plants records search reviewed for 21611 Perry Street Self Storage Project, located in the City of Carson, Los Angeles County, California.

## Project Site Location

The 21611 Perry Street Self Storage Project is located on a 2.80-acre lot at 21611 South Perry Street in the City of Carson (Project Site). The Project Site is within the Torrance U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map. The project proposes the development of a self-storage facility with three buildings totaling approximately 113,714 square feet. Additionally, the proposed project would provide approximately 23,000 square feet of landscaping around the perimeter of the project site. The property was previously developed with an industrial building and paved parking surfaces through 2011.

## Methods

A review of aerial maps and biological resource databases was undertaken to identify biological resources potentially occurring within the Project Site and broader vicinity of the immediately adjacent region. Recent and historical aerial imagery was reviewed, as well as the topographic electronic copies of the Torrance USGS 7.5-minute topographic quadrangle map. Aerial imagery (Google Earth 2021) was reviewed to confirm the current locations of developed and undeveloped land, and unique landforms within the Project Site vicinity. A list of special-status plant and wildlife species and their habitats previously recorded to occur near the Project Site was compiled primarily from the California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDDB) (2021) and California Native Plant Society (CNPS) (2021) Inventory of Rare and Endangered Plants. ESA conducted a query of the CNDDDB and CNPS records for the following USGS 7.5-minute topographic quadrangle maps that surround the Project Site included: Inglewood, Long Beach, Redondo Beach, San Pedro, South Gate, Torrance, and Venice. Based on Google Earth imagery, the Project Site consists of sparse ruderal vegetation with plantings of carrotwood (*Cupaniopsis anacardioides*) as street trees along Perry Street.

Other data sources reviewed included the United States Department of Agriculture Natural Resources Conservation Service (NRCS) soils mapping (USDA 2021), U.S. Fish and Wildlife Service (USFWS) critical habitat maps (USFWS 2021a), the USFWS Information for Planning and Consultation (IPaC) (USFWS 2021b), and the National Wetlands Inventory (NWI) (USFWS 2021c).

## Results

### ***Special-Status Species and Sensitive Communities/Habitats***

Special-status plants are defined as those plants that, because of their recognized rarity or vulnerability to various causes of habitat loss or population decline, are recognized by federal, state, or other agencies as under threat from human-associated developments. Some of these species receive specific protection that is defined by federal or state endangered species legislation. Others have been designated as special-status on the basis of adopted policies and expertise of state resource agencies or organizations with acknowledged expertise, or policies adopted by local governmental agencies such as counties, cities, and special districts to meet local conservation objectives. Special-status plants are defined as follows:

- Plants that are listed or proposed for listing as threatened or endangered, or are candidates for possible future listing as threatened or endangered, under the FESA or the CESA
- Plants that meet the definitions of rare or endangered under State CEQA Guidelines Section 15380
- Plants covered under an adopted Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan (HCP)
- Plants considered by the CNPS to be rare, threatened, or endangered (Rank 1A, 1B, 2A and 2B plants) in California
- Plants listed as rare under the California Native Plant Protection Act (Fish and Game Code 1900 et seq.)

The potential for special-status plant species to occur within the Project Site is based on on-site vegetation and habitat quality, topography, elevation, soils, surrounding land uses, habitat preferences and geographic ranges. A review of the CNDDDB (CDFW 2021) and the CNPS Inventory of Rare and Endangered Plants (CNPS 2021) revealed that many special-status plant species have been recorded within the USGS quadrangle search area.

A total of 15 special-status plant species were determined to have no to low potential to occur within the Project Site. No focused rare plant surveys were conducted at this time nor are they warranted. Additionally, no sensitive natural communities occur within the Project Site or adjacent vicinity. However, based on the criteria listed below, it has been determined that two of these special-status plant species have a low potential to occur because of the sites proximity to the Dominguez Channel to the west. These two species with low potential to occur are southern tarplant (*Centromadia parryi* ssp. *australis*) and Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*). All results and potential to occur determinations are listed in Attachment A.

The criteria for potential to occur include:

- **Present:** Species was observed or detected during the biological survey.
- **High Potential:** Species identified in the literature search and/or known to occur in the region and suitable habitat is present on the project site. These species are generally common and/or widespread in the project area and vicinity.

- **Moderate Potential:** Species identified in the literature search and/or known to occur in the region and suitable habitat is present within the project site. These species are generally less common and/or widespread than species considered to have “high” potential to occur.
- **Low Potential:** Species identified in the literature search or known to occur in the region, but the habitat on site is of low or marginal quality and/or the project site occurs outside the species known geographic or elevational range. Distance to nearest known occurrence and the age of last reported local occurrence are also considered.
- **Not Expected:** Species identified in the literature search or known to occur in the region, but suitable habitat on site is not present, nor is such habitat nearby. Distance to nearest known occurrence and the age of last reported local occurrence are also considered.

Two special-status plant species are determined to have a low potential to occur within the Project Site. The 13 species with no potential to occur within the project site are further detailed in **Attachment A**.

### ***Special-Status Wildlife***

Special-status wildlife consists of those animals that, because of their recognized rarity or vulnerability to various forms of habitat loss or population decline, are considered by federal, state, or other agencies to be under threat from human-associated developments. Some of these species receive specific protection that is defined by federal or state endangered species legislation and others have been designated as special-status on the basis of adopted local policies (i.e., city and county) or the educated opinion of respected resource interest groups (e.g., Western Bat Working Group). Special-status wildlife is defined as follows:

- Wildlife listed or proposed for listing as threatened or endangered, or are candidates for possible future listing as threatened or endangered, under the FESA or the CESA.
- Wildlife that meet the definitions of rare or endangered under California Environmental Quality Act (CEQA) Guidelines Section 15380.
- Wildlife covered under an adopted NCCP/HCP.
- Wildlife designated by CDFW as species of special concern, included on the Watch List or are considered Special Animals.
- Wildlife “fully protected” in California (California Fish and Game [CFG] Code Sections 3511, 4700, and 5050).
- Bird species protected by the Migratory Bird Treaty Act (MBTA).
- Bat species considered priority by the Western Bat Working Group (WBWG).

The potential for special-status wildlife species to occur within the Project Site is based on on-site vegetation and habitat quality, topography, elevation, soils, surrounding land uses, habitat preferences and geographic ranges. A review of the CNDDDB (CDFW 2021) revealed that many special-status wildlife species have been recorded within the seven USGS quadrangle search area. This analysis included 18 special-status wildlife species. However, based on the criteria listed below, it has been determined that none of these wildlife species have the potential to occur because they lacked the necessary habitat requirements or do not have a range that overlaps within the Project Site. These are further detailed in **Attachment B** and have been omitted from further discussion.

- **Present:** The species was observed within the Project Site during the site assessment or has been documented within or immediately adjacent to the Project Site during recent surveys (with 2 years).
- **High Potential:** Species identified in the literature search and/or known to occur in the region and suitable habitat is present on the Project Site. These species are generally common and/or widespread in the Project Site area and vicinity.
- **Moderate Potential:** Species identified in the literature search and/or known to occur in the region and suitable habitat is present within the Project Site. These species are generally less common and/or widespread than species considered to have “high” potential to occur.
- **Low Potential:** Species identified in the literature search or known to occur in the region, but the habitat on site is of low or marginal quality and/or the Project Site occurs outside the species known geographic or elevational range. Distance to nearest known occurrence and the age of last reported local occurrence are also considered.
- **Not Expected:** Species identified in the literature search or known to occur in the region, but suitable habitat on site is not present, nor is such habitat nearby. Distance to nearest known occurrence and the age of last reported local occurrence are also considered.

A total of 18 special-status wildlife species were determined as not expected to occur within the Project Site. No focused surveys were conducted at this time and none are warranted. All results and potential to occur determinations are listed in Attachment B. All species identified through the database search are not expected to occur in the Project Site due to the history of the developed nature of the site and near complete lack of suitable habitat.

## Conclusion

No site visits were conducted during this biological literature and database review. In summary, only two special-status plant species were determined to have a low potential to occur within the Project Site. No other special-status plant or wildlife species are not expected to occur within the Project Site. Additionally, no sensitive natural communities occur within the Project Site or adjacent vicinity. It should be stated the Project Site was previously completely developed and built up with a large building and associated infrastructure therefore has limited vegetation and wildlife species.

Should you have any questions regarding the findings in this letter report, please do not hesitate to contact Ryan Gilmore ([rgilmore@esassoc.com](mailto:rgilmore@esassoc.com)) at 909-727-7634.

A handwritten signature in black ink, appearing to be 'R Gilmore', with a long horizontal line extending to the right.

Ryan Gilmore  
Principal Biologist/Urban Forester  
ISA WE-9009BM

Attachments:  
Attachment A: Special-Status Plant Species

Attachment B: Special-Status Wildlife Species

## References Cited

- California Department of Fish and Wildlife (CDFW). 2021. *California Natural Diversity Database (CNDDDB) RareFind 5*. CDFW's Electronic database, Sacramento, California. Accessed on November 9, 2021, at <https://www.dfg.ca.gov/biogeodata/cnddb>.
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- U.S. Fish and Wildlife Service (USFWS 2021b). 2021. IPaC Information for Planning and Consultation (IPaC). Accessed on November 9, 2021, at <https://ecos.fws.gov/ipac/location/index>.
- U.S. Fish and Wildlife Services (USFWS 2021c). 2021. National Wetland Inventory (NWI) Data Mapper. Accessed on November 9, 2021, at <https://www.fws.gov/wetlands/Data/Mapper.html>.

# Attachment A: Special-Status Plant Species

# Attachment B: Special-Status Wildlife Species