



Pacific Edge Hotel Remodel Project

Draft Initial Study – Mitigated Negative Declaration

prepared by

City of Laguna Beach
Community Development Department
505 Forest Avenue
Laguna Beach, California 92651
Contact: Evan Jedynak, Associate Planner
Martina Caron, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012

October 2020

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RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

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Initial Study

1. Project Title

Pacific Edge Hotel Remodel Project

2. Lead Agency Name and Address

City of Laguna Beach
505 Forest Avenue
Laguna Beach, California 92651

3. Contact Person

Evan Jedynak, Associate Planner
505 Forest Avenue
Laguna Beach, California 92651
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4. Project Sponsor's Name and Address

HCI Laguna Owner L.P.
c/o Highgate Hotels
870 7th Avenue, 2nd Floor
New York, New York 10019

5. Project Location

The project site is located west of Coast Highway (State Route 1, or SR-1) between Sleepy Hollow Lane and Cleo Street in the City of Laguna Beach, County of Orange, California. The project site is comprised of 11 parcels and includes the following addresses:

- 610 Sleepy Hollow Lane (Assessor Parcel Number [APN]: 644-021-01)
- 619 Sleepy Hollow Lane (APN: 644-022-02)
- 620 Sleepy Hollow Lane (APN: 644-021-02)
- 627 Sleepy Hollow Lane (APN: 644-022-016)
- 633 Sleepy Hollow Lane (APN: 644-022-017)
- 636 Sleepy Hollow Lane (APN: 644-021-03)
- 635 Sleepy Hollow Lane (APN: 644-022-04)
- 647 South Coast Highway (SR-1) (APN: 644-021-04)
- 653 Sleepy Hollow Lane (APN: 644-022-06)
- 667 Sleepy Hollow Lane (APN: 644-022-07)
- 668 Sleepy Hollow Lane (APN: 644-021-05)

Figure 1 shows the location of the project site in the region and Figure 2 shows the location of the project site in its neighborhood context.

6. General Plan Designation

The project site has a General Plan land use designation of Commercial/Tourist Corridor (CTC), which provide for visitor-serving facilities such as hotels, restaurants, theaters, museums, and beach-related retail (Laguna Beach 2012). In addition, the project is within the City's Coastal Zone and Local Coastal Program.

7. Zoning

The project site is zoned Local Business District (C-1) on APNs 644-021-01 through -05 and Commercial Hotel-Motel (CH-M) on APNs 644-022-02, 644-022-04, 644-022-06, 644-022-07, 644-022-16, and 644-022-17.

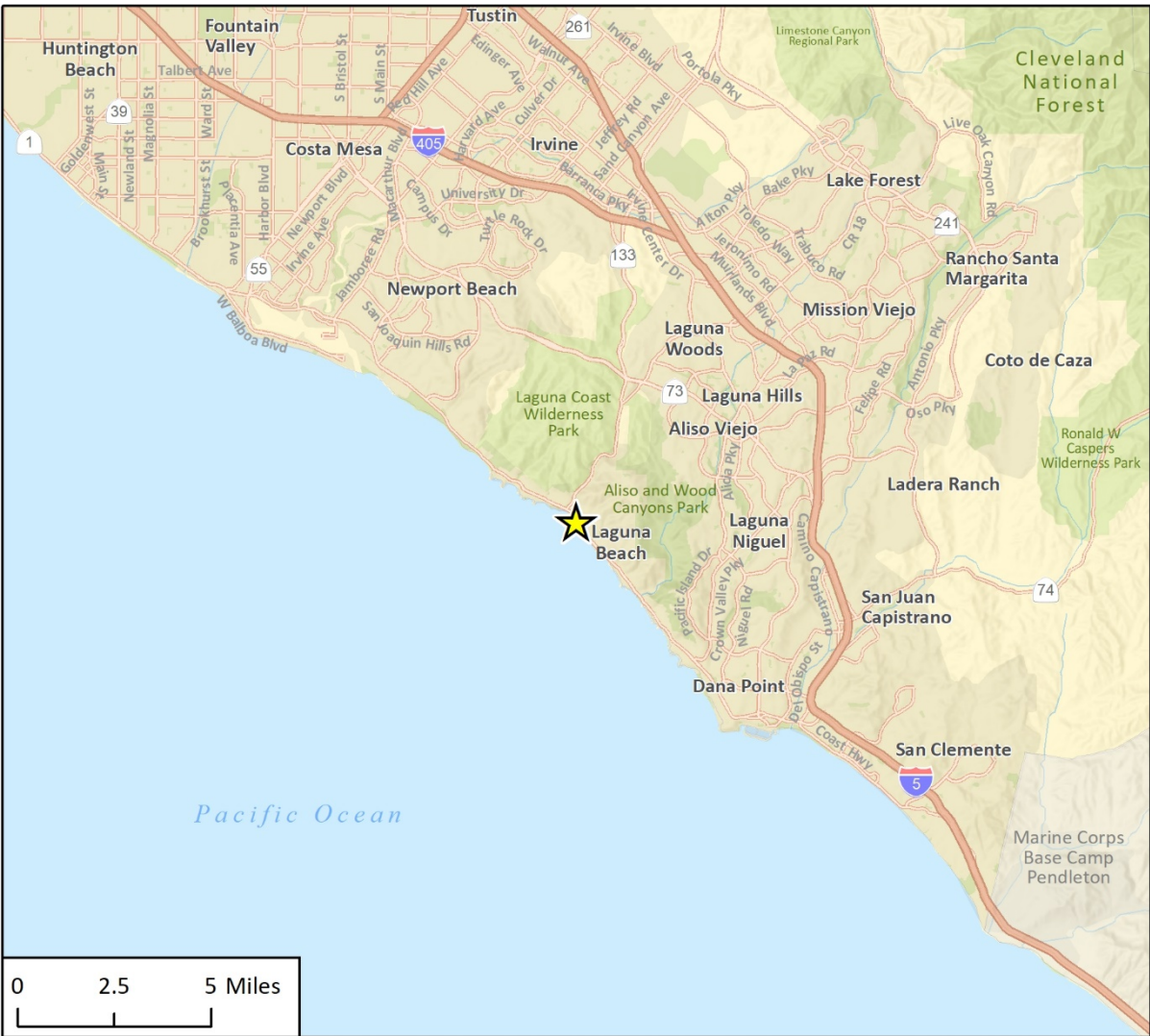
8. Regional Setting

The City of Laguna Beach is a coastal City in southern Orange County. It is located approximately 20 miles southwest of the City of Santa Ana, and 15 miles southwest of John Wayne International Airport. Laguna Beach is surrounded by Crystal Cove State Park and the City of Newport Beach to the north, the Cities of Laguna Woods, Aliso Viejo, and Laguna Niguel to the east, the City of Dana Point to the south, and the Pacific Ocean to the west. Regional access to the project site is available from SR-1 or Interstate 405 (I-405), Interstate 5 (I-5) or California State Route 73 (SR-73) via Laguna Canyon Road (CA-133).

9. Site Characteristics and History

The site is in an urban area, has been previously developed with the existing Pacific Edge Hotel, and is surrounded by roads and urban structures (residential and commercial buildings). The project site contains nine buildings with 131 guest rooms, two pool areas, and two restaurants, additionally, there are four surface parking areas along with ground-level below building parking spots that provide 220 spaces. A summary of existing conditions on each parcel is provided in Table 1 below.

Figure 1 Regional Location



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★ Project Location

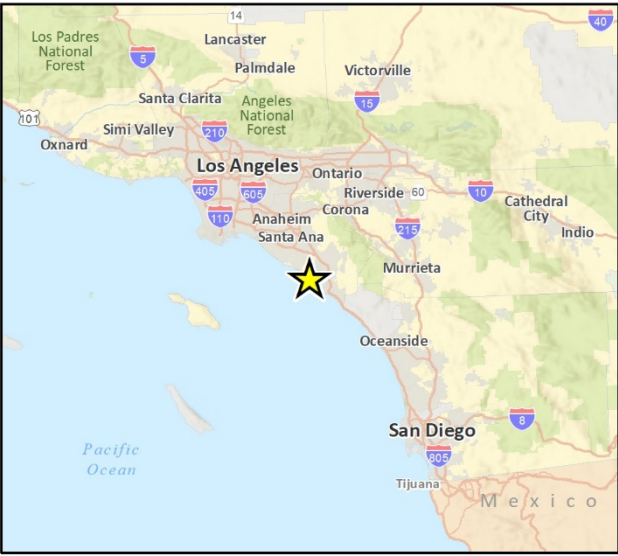


Fig 1 Regional Location

Figure 2 Project Location



Table 1 Existing Site Conditions Summary

Address	APN	Building Name	Lot Area (sf)	Building Living Area (sf) ¹	Guest Rooms and/or Restaurant Seats	Maximum Building Height from Grade (ft)
610 Sleepy Hollow Lane	644-021-01	Parking Lot	5,193	n/a	n/a	n/a
619 Sleepy Hollow Lane	644-022-02	Driftwood Kitchen Restaurant	9,513	5,229	100 seats	40.66
620 Sleepy Hollow Lane	644-021-02	Parking Lot	4,027	n/a	n/a	n/a
627 Sleepy Hollow Lane	644-022-16	Villa Hotel and Restaurant	9,624	4,919	2 rooms, 163 seats	39.38
633-635 Sleepy Hollow Lane	644-022-17, 644-022-04	Surf ²	15,917	12,310	35	44.74
636 Sleepy Hollow Lane	644-021-03	Bahia	12,030	10,099	15	35.23
647 Cost Highway	644-021-04	Coast	5,406	3,530	5	40.2
653 Sleepy Hollow Lane	644-022-06	Reef Tower and Cottage ³	8,250	Reef Tower 7,198, Cottage 893	15 (Reef Tower), 1 (Cottage)	63.7 (Reef Tower), 22.8 (Cottage)
667 Sleepy Hollow Lane	644-022-07	Reef Wing	19,031	9,005	24	46.99
668 Sleepy Hollow Lane	644-021-05	Seas	13,507	11,631	34	37.33

¹Source: Area calculations shown on drawing page T1.01.

²Surf building is a single building that spans two addresses/parcels

³Reef Tower and the Cottage are two separate buildings on the same parcel

APN: Assessor Parcel Number; sf: square feet; ft: feet; n/a: not applicable

Based on aerial photographs and historical topographic maps dating back to 1896, the project site was first developed by 1925 with several residential structures. In the site vicinity included SR-1, residential development, and vacant land (TA Group DD, LLC 2020). The current Driftwood Kitchen building was originally constructed in 1932 as a single-family residence and was converted to a restaurant in 1968. The Cottage building was developed in 1946, and also by 1946, Sleepy Hollow Lane had been constructed (TA Group DD, LLC 2020). Construction of the hotel buildings began as early as 1946 with the Bahia building and continued through the 1980's. Similarly, development surrounding the project site also increased and the area urbanized, consisting mostly of residential and commercial uses (TA Group DD, LLC 2020).

10. Description of Project

The proposed project involves interior remodeling of nine existing buildings on the project site, construction of a new building (“New Reef”) with 15 hotel rooms, a pool/lounge and a single level subsurface parking garage with car stacking parking equipment located at 667 Sleepy Hollow Lane, landscape and exterior lighting updates throughout the project site, the demolition of an existing swimming pools at the Surf and Seas buildings, the addition of a porte cochère with below grade storage and office space at the existing Surf building, repaving and restriping of existing parking lots, and roadway improvements to Sleepy Hollow Lane, and below grade kitchen expansion and conversion of storage to a conference room at the Villa Building. Figure 3 and Figure 4 shown the site plan and preliminary landscaping plan, respectively, while Figure 5 and Figure 6 show the proposed site sections for the new building at 667 Sleepy Hollow Lane. Table 2 depicts the proposed project building summary.

Existing Buildings Interior and Exterior Remodel

All of the existing buildings would include some interior remodeling (to varying degrees). Additionally, the street front patio at the Driftwood Kitchen building would be remodeled and provided new landscaping. The Villa building interior would be remodeled to create a new hotel lobby that would replace the existing lobby at the Coast building. The Villa would undergo a 628 sf below grade expansion to improve the kitchen and back of house storage and conversion of the existing storage room on the entry level to a conference room. In addition, the Villa building’s restaurant and bar would be updated and the seating would be revised to remove 48 existing seats, reducing the seating capacity from 163 seats to 115 seats. The Coast building would undergo an interior remodel including the conversion of the existing lobby to an outdoor public café and private fitness center and the replacement of mechanical, electrical, and plumbing as needed. The exterior remodel of the Coast building would include the installation of a public patio over the existing Coast building parking lot.

The Surf building interior and exterior would be remodeled, including the replacement of mechanical, electrical, and plumbing systems as needed. The Surf building pool and adjacent game rooms would also be demolished in order to construct a new porte cochère with below grade storage and office space; however, the floor area of the existing building would not increase.

The Bahia building interior and exterior would be remodeled, including the replacement of mechanical, electrical, and plumbing systems as needed. The existing 15 guest rooms would be further divided in order to create an additional six rooms, for a new total of 21 guest rooms.

The Reef Wing building guest rooms would be remodeled and exterior repairs to the building façade, railings, and decks would be completed. This building would also include replacement of the mechanical, electrical and plumbing systems as needed.

The Seas building would undergo an interior and exterior remodel, with replacement of mechanical, electrical, and plumbing systems as required. In addition, the interior remodel would include a division of one room to create two rooms and conversion of 3 existing carports to three new guest rooms. There would be an increase of 975 sf in floor area.

The Reef Tower and Cottage building façades, stairs, railings, and decks would be repaired. In addition, the guest rooms and bathrooms would be remodeled.

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Figure 4 Preliminary Landscaping Plan

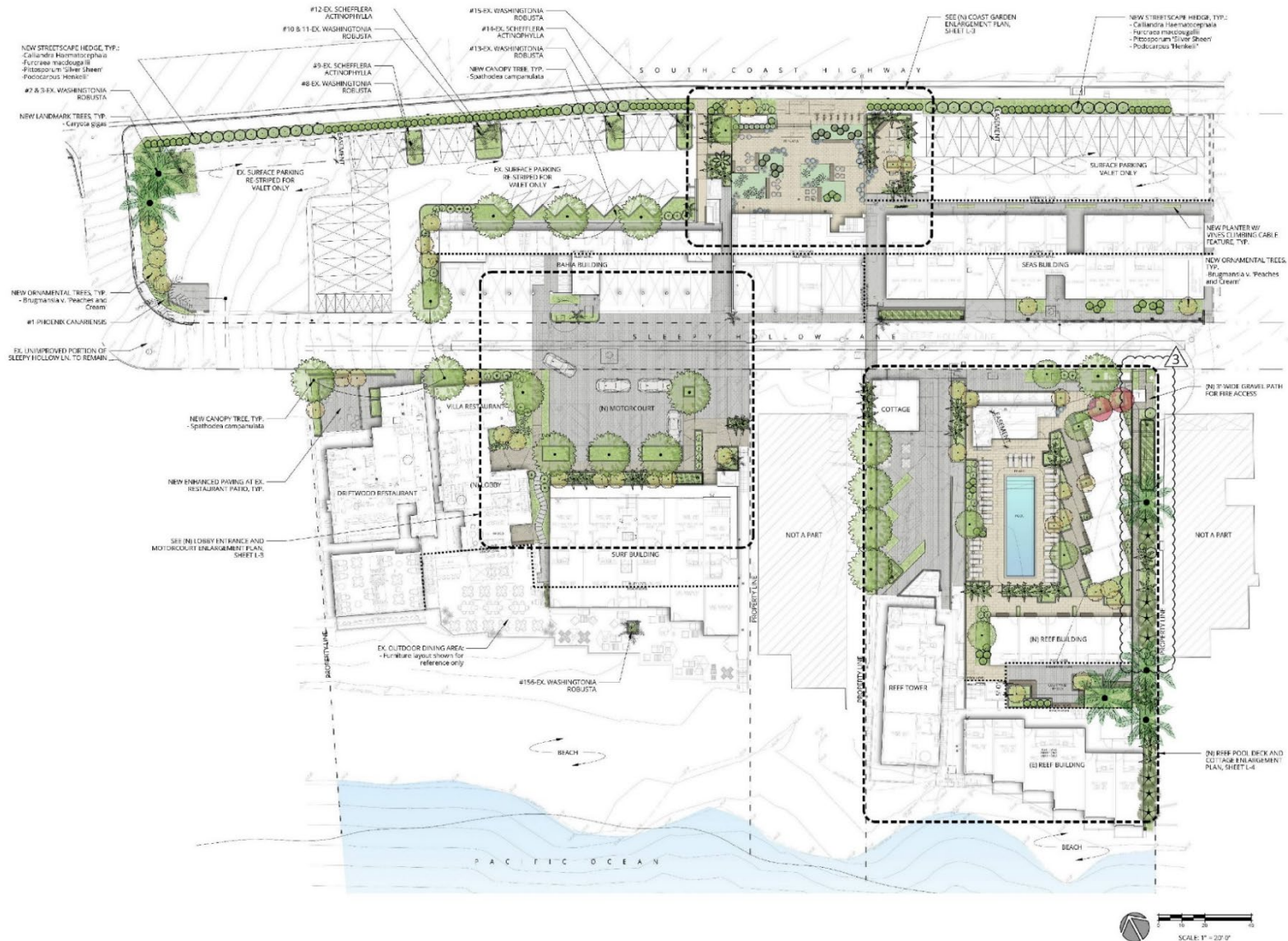


Figure 5 Site Section from North/South

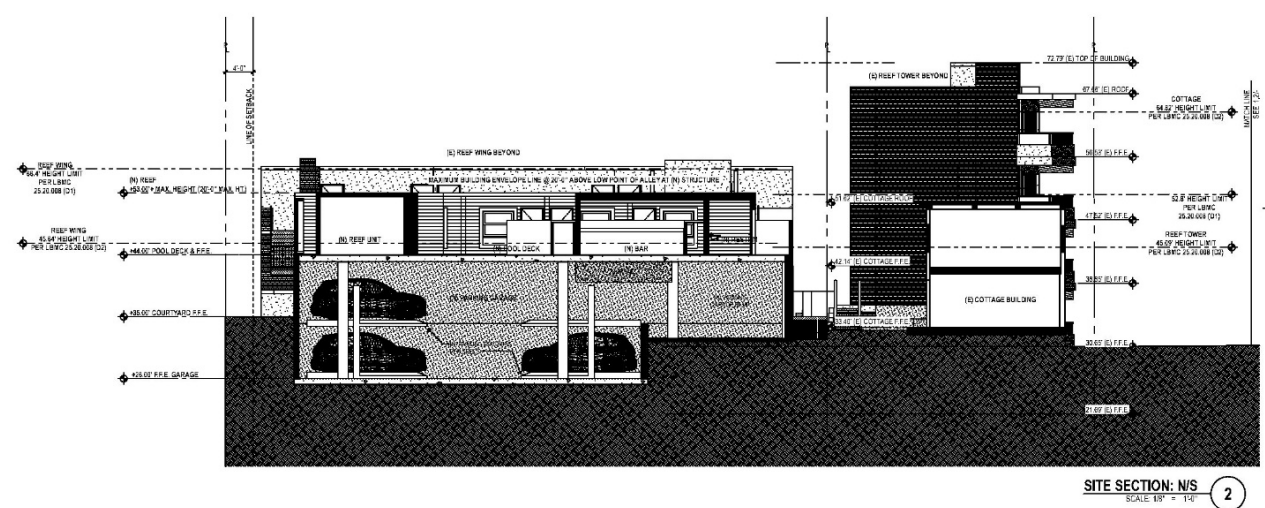
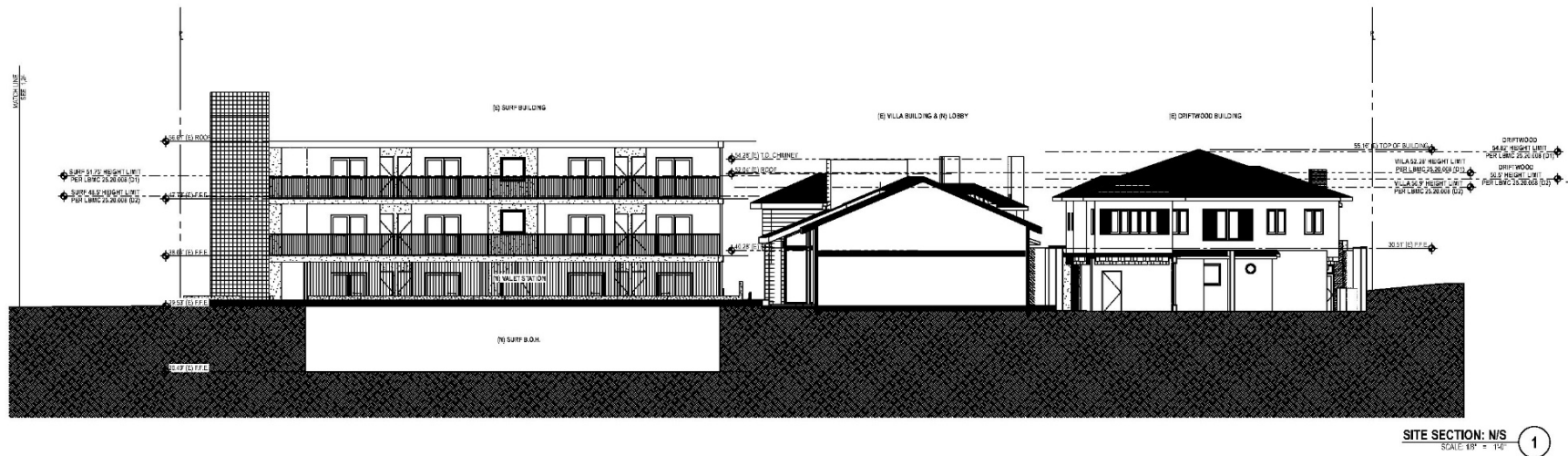
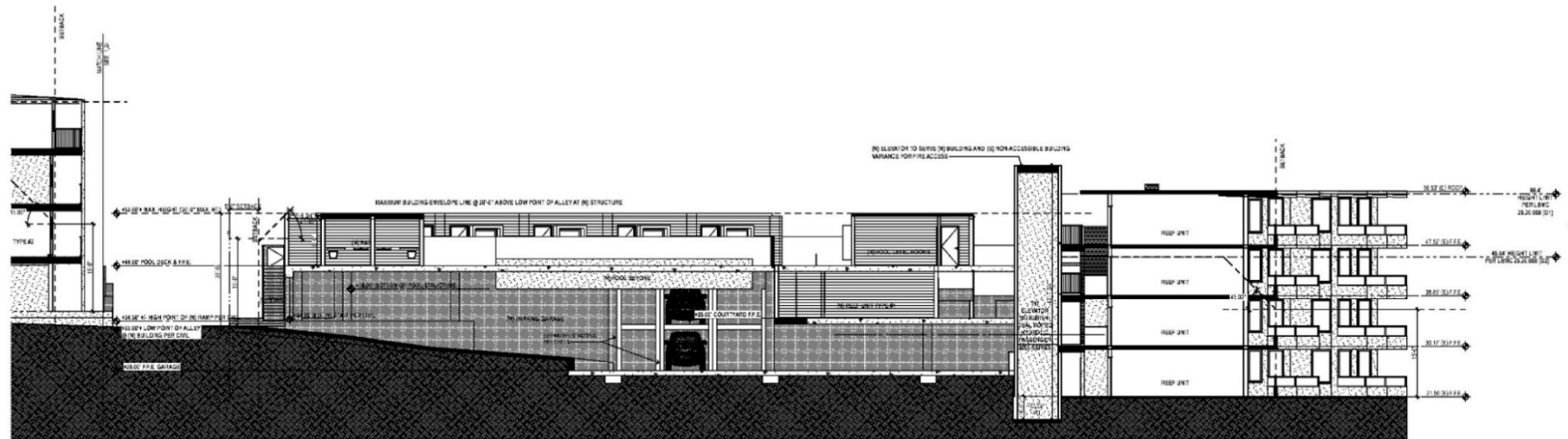
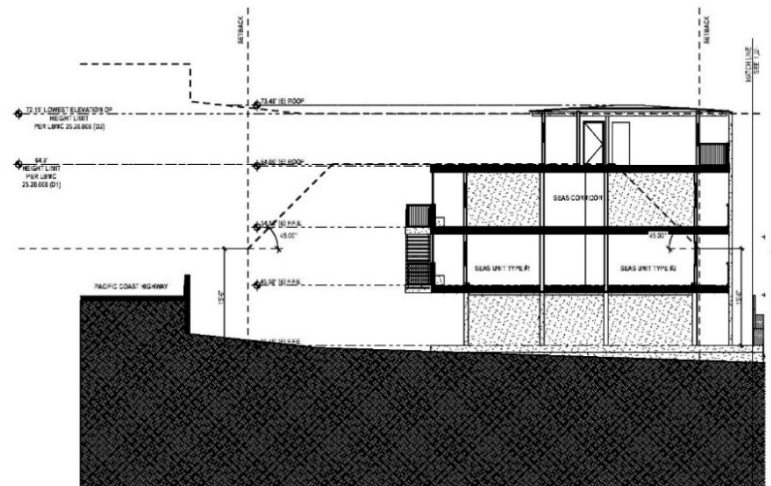


Figure 6 Site Section East/West



SITE SECTION E/W
SCALE: 1/8" = 1'-0" 1



SITE SECTION E/W
SCALE: 1/8" = 1'-0" 2

Proposed New Building

The project includes the construction of the New Reef building at 667 Sleepy Hollow Lane over an existing surface parking lot. The building would be designed in a modern architectural style and would include 15 guest rooms, a single level subterranean parking garage with car stacking equipment, and pool with a bar/lounge area. The building would include 4,703 sf of living area, 10,059 sf of garage space, a 6,250 elevated deck/terrace area with a pool and lounge, and 321 sf of storage/mechanical space. The building would conform with the requirements of the CH-M zone and would be a maximum of 20 feet tall, as measured from Sleepy Hollow Lane. In addition, the building would be constructed pursuant to the recommendations of the Geotechnical Investigation prepared by Petra Geosciences, Inc. (Petra) and the California Building Code, including a solid bedrock foundation and soil compaction, to ensure seismic safety (Petra 2019; Appendix E).

Infrastructure and Landscaping Improvements

The project would include improvements to Sleepy Hollow Lane, including repaving the road and adding new landscaping and lighting. In addition, new street landscaping and lighting along the SR-1 frontage would be included, as well as the removal of the driveway and curb apron at 647 Coast Highway in accordance with California Department of Transportation (Caltrans) requirements. The project would also involve the construction of a new trash enclosure in one of the existing surface parking lots.

New landscaping would include drought tolerant plants, such as agave (*Agave attenuata*), Kentia palm (*Howea forsteriana*) and mousehole tree (*Myoporum laetum*) and would help provide shade and screening throughout the project site. New landscaping would be irrigated through a combination of low-volume spray heads, bubblers, and drip systems that would be controlled by an automatic timer with a seasonal adjustment capacity to apply less water during rainy periods. Landscaping and irrigation plans would be prepared in accordance with the California Model Water Efficient Landscape Ordinance.

Access, Circulation, and Parking

As discussed above, the project would provide street improvements to Sleepy Hollow Lane and SR 1, which are the main access points for the project site. The proposed project would remove the existing driveway at SR-1, resulting in hotel traffic being redirected entirely to Sleepy Hollow Lane either via the intersections of Sleepy Hollow Lane and SR-1 or Cleo Street and Sleepy Hollow Lane. Hotel and restaurant patrons arriving by vehicle would be directed to the new porte cochère located at the Surf building off Sleepy Hollow Lane, where the valet stand would be located. Parking at the project site would be by valet only.

By repaving and restriping and with the addition of a subterranean parking garage at 667 SHL, the project would continue to provide 220 valet parking spaces as currently available on site. As part of the 220 valet parking spaces, the project includes seven ADA parking spaces, two electric vehicle charging spaces, 18 motorcycle and 36 bicycle parking spaces.

Table 2 Project Summary

Building Name	Proposed Activities	Existing Building Living Area (sf) ¹	Proposed Building Living Area (sf)	Existing Guest Rooms and/or Restaurant Seats	Proposed Guest Rooms and/or Restaurant Seats	Area to be Remodeled (sf)
Driftwood Kitchen Restaurant		5,229	5,229	100 seats	162	70
Villa Hotel and Restaurant		4,199	4,826	2 rooms, 163 seats	2 rooms, 115 seats	3,400
Surf		12,310	16,233	35	35	2,644
Bahia		10,099	10,099	15	21	3,069
Coast		3,530	4,058	5	5	2,106
Reef Tower		7,198	7,198	15	15	2,057
Cottage		893	893	1	1	429
Reef Wing		9,005	9,005	24	24	1,359
Seas		11,631	12,596	34	38	1,896
New Reef ²		n/a	4,703	n/a	15	n/a

sf: square feet
¹Source: Area calculation shown on drawing page T1.01.
²Proposed new building

In total, the project would result in 25 new hotel rooms, 14 additional restaurant seats, new amenities for hotel guests (e.g., a new swimming pool, a fitness center, and a new lobby), new hotel operations facilities (e.g., a porte cochère and new offices), and a new café with public seating at the Coast building.

Construction

Project construction is estimated to begin in June 2021 and to be completed in June 2022, for a total construction period of approximately one year. Construction phases would include demolition, site preparation, grading, excavation for the subterranean parking garage, building construction, architectural coating (painting), and paving of approximately 0.30 acres. Construction details are provided in Table 3, below.

Table 3 Anticipated Construction Program

Phase	Proposed Activities	Start (Month/Day/Year)	Finish (Month/Day/Year)	Duration (Days)
Demolition	Demolish pool and select portions of structures	6/1/2021	6/30/2021	20
Site Preparation	Vegetation and debris removal	7/1/2021	7/30/2021	20
Grading	Grade New Reef Site, excavate new garage	8/2/2021	8/31/2021	23
Building Construction/ Remodel	Construct New Reef, remodel existing buildings	9/1/2021	5/31/2022	197
Paving	Repave surface lots and Sleepy Hollow Lane	2/1/2022	5/31/2022	88
Architectural Coating (painting)	Paint new building and remodeled surfaces	2/1/2022	5/31/2022	88

Sources: applicant provided information, California Emissions Estimator Model (CalEEMod) estimates (Appendix A)

Approximately 5,370 cubic yards (cy) of soil will be cut, of which 450 cy would be reused on the site and 4,920 cy would be exported. No soil would be imported. Exported soil would be taken to either the Camp Pendleton Landfill located approximately 40 miles, or Olinda Landfill, 30 miles from the project site, respectively.

To access the Camp Pendleton Landfill, haul trucks would take SR-1 south to I-5 South, exit at Vandegrift Boulevard and travel north on Vandegrift Boulevard to the landfill site. To access the Olinda Landfill, haul trucks would utilize the following route: SR-1 north to CA-133, CA 133 to I-5 north, to SR-57 north to East Lambert Road, to access the landfill. Haul trucks are anticipated to have a standard 16 cy capacity and hauling would take place over 615 trips.

Construction equipment would be staged on site and would generally include one of each of the following pieces of equipment: aerial lift, backhoe, bore/drill rig, compressor, crane, dumper/tender, excavator, rough terrain forklift, paving equipment, plate compactor, pump, roller, skid steer loader, and welder.

Pursuant to the Laguna Beach Municipal Code (LBMC) Section 7.25.080, construction activities would only occur Monday through Friday between the hours of 7:30 a.m. and 6:00 p.m.

Project Operation

The hotel lobby would continue to operate 24 hours per day, as it does under current conditions. In addition, the Driftwood Kitchen and Villa Restaurant operating hours would remain unchanged. The proposed new café at the Coast building would be open to the public from 6:30 a.m. to 11:00 p.m.. Hotel amenities, such as spas, pools, and the fitness center would be open 7:00 a.m. to 10:00 p.m. Operation of the hotel with the improvements provided by the proposed project would not require the addition of new employees. Hotel employees would remain around 30, with no more than 20 hotel employees per shift. The restaurants would have 65 total employees with no more than 30 restaurant employees per shift. The total hotel and restaurant employees would remain at 95 with no more than 50 being on site at any given time.

11. Required Approvals

City of Laguna Beach Planning Commission Design Review approval, Conditional Use Permit, Coastal Development Permit, and variance.

12. Other Public Agencies Whose Approval is Required

California Coastal Commission, if project were to be appealed.

13. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code (PRC) Section 21080.3.1?

As part of the process of identifying cultural resources issues in or near the project site, the City sent letters inviting tribes to consult with the City on November 14, 2019. The City requested a response within 30 days of receipt as specified by AB 52. The City received feedback from the Juaneño Band of Mission Indians on December 3, 2019.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Potentially Significant Unless Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☐ Energy |
| ☒ Geology/Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☐ Hydrology/Water Quality | ☐ Land Use/Planning | ☐ Mineral Resources |
| ☒ Noise | ☐ Population/Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☒ Tribal Cultural Resources |
| ☐ Utilities/Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

Determination

Based on this initial evaluation:

- ☐ I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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- ☐ I find that although the project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.



Signature

10/22/20

Date

Martina Caron

Printed Name

Senior Planner

Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in PRC Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

For purposes of determining significance under CEQA, scenic resources are the visible natural and cultural features of the landscape that contribute to the public's enjoyment of the environment. A scenic vista is defined as a public viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Public views are those that are experienced from a publicly accessible vantage point, such as a roadway or public park. Scenic vistas can be officially designated by public agencies, or informally designated by tourist guides. The California Department of Transportation (Caltrans) manages the California State Scenic Highway Program, which designates state scenic highways. Scenic highways are highways located in areas of natural beauty. A scenic highway becomes officially designated when the local governing body applies to and is approved by Caltrans for scenic highway designation and adopts a Corridor Protection Program that preserves the scenic quality of the land that is visible from the highway right of way (Caltrans 2020a). Public views are those that are experienced from a publicly accessible vantage point.

a. Would the project have a substantial adverse effect on a scenic vista?

According to the City's Landscape and Scenic Highways Element, aesthetic resources in the City predominantly consist of the San Joaquin Hills that surround the City, the Pacific Ocean to the west, and the Aliso and Laguna Canyons. Public views of these resources are primarily available from SR-1, Laguna Canyon Road, other local roads, and public areas such as parks, beaches, and trails (Laguna Beach 2018a). Aliso Canyon is located approximately 2.5 miles southeast of the project site and is not visible from the project site or its vicinity. The southern terminus of Laguna Canyon is located approximately 3,700 feet north of the project site, where Laguna Canyon Road becomes Broadway Street. Public views of Laguna Canyon are not visible from the project vicinity due to the distance between the canyon and the project site, as well as intervening commercial and residential structures located along SR-1.

The Laguna Beach Landscape and Scenic Highways Resources Document (LSHRD), which was adopted along with the Landscape and Scenic Highways General Plan Element, provides guidelines for the preservation and enhancement of the City's landscape and scenic streets (Laguna Beach 2018b). According to the LSHRD, the project site is within the Central Laguna, Gaviota neighborhood, which is primarily a commercial area with small to medium-sized store fronts, hotels, and restaurants, as well as scattered oceanfront apartments, townhomes, and condos (Laguna Beach 2018b). Public scenic vistas in the neighborhood include views of the surrounding hillsides to the north, east, and south from SR-1 and views of the Pacific Ocean to the west from the eight public access points, such as Thalia Street and Oak Street, which include view platforms. Due to existing commercial and residential development in the project vicinity, views of the Pacific Ocean are limited to glimpses between structures and views from public beach access points such as the view platforms at Thalia Street and Oak Street.

The proposed project involves a mix of small-scale internal and external remodeling, landscaping improvements, parking lot and roadway improvements to Sleepy Hollow Lane, the addition of a porte cochère at the Surf Building, and the construction of a new building with 15 rooms and a pool/lounge area to the parcel located at 667 Sleepy Hollow Lane. The purpose of these activities is to create a more cohesive aesthetic between the various buildings that comprise the Pacific Edge Hotel, improve the landscaping and exterior of the project site, and update the aging interiors of the hotel buildings.

As discussed above, public views of the Pacific Ocean in the vicinity of the project site are limited to glimpses between structure and public access points. Building heights would remain as existing and the proposed new building would conform with all applicable zoning height (maximum building height 20 feet) and setback standards. In addition, the new building would be located on an existing interior parking lot that lies between two existing buildings of equal or higher height than the proposed new structure and would not affect public views from SR-1.

Story Poles were erected to illustrate the height and footprint of the proposed new building. To document the potential impacts, photographs were taken from various points within the project site and from publicly available views from nearby roadway, as shown in Figure 7.

Figure 7 Construction Story Poles Photographs



Figure 7a: View of New Reef Building story poles from Sleepy Hollow Lane.



Figure 7b: View of existing Pacific Edge Hotel frontage along SR-1.



Figure 7c: View of existing Pacific Edge Hotel from the intersection of SR-1 and Cleo Street.



Figure 7d: View of existing Pacific Edge Hotel from the sidewalk at the intersection of SR-1 and Sleepy Hollow Lane.



Figure 7e: View towards Pacific Edge Hotel from the sidewalk at the intersection of Cleo Street and Sleepy Hollow Lane.

Figure 7a depicts images of the story poles internally from the site. Figure 7b through Figure 7d, show that the story poles are not visible from SR-1. Figure 7e illustrates that the story poles are not visible from Cleo Street. Therefore, the proposed new building would not affect public views of scenic resources from these roadways. As illustrated in Figure 7a, the proposed new building would not block views of the ocean from Sleepy Hollow Lane, as ocean views are already obstructed by existing structures. Therefore, the changes proposed to the project site would not substantially block public views of the Pacific Ocean. In addition, as the project site is located west of SR-1, the proposed changes to the project site would not block public views of the San Joaquin Hills surrounding the City to the north, east, and south. Therefore, impacts to scenic vistas would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The California Scenic Highway System indicates that no existing or proposed State scenic highways are located in the vicinity of the project site (Caltrans 2020b). The nearest designated scenic highway is State Route 38, located approximately 69 miles northeast of the project site in San Bernardino County. However, the stretch of SR-1 that runs through Laguna Beach is eligible for designation as a state scenic highway (Laguna Beach 2018a). According to the City's Landscape and Scenic Highways Element, the City intends to eventually implement a Corridor Protection Plan for SR-1 (Laguna Beach 2018a). The LSHRD classifies the SR-1 into zones and provides landscaping and streetscape improvement recommendations for each zone (Laguna Beach 2018b). The project site is within LSHRD Zone E of the SR-1 (Laguna Beach 2018b).

There are no designated historic buildings located on the project site's SR-1 frontage and the site does not contain natural vegetation or landscape features that would contribute to the scenic quality of the SR-1 corridor. In addition, as discussed under Impact a. above, the project would not substantially

block views of scenic vistas in the vicinity. The project would update the landscaping and lighting along the SR-1 frontage, which would require the removal or relocation of some trees and ornamental landscaping on the site, but would not otherwise affect any rock outcroppings, historic buildings, or other identified scenic resources within a state scenic highway.

The proposed project would incorporate the landscaping recommendations of the LSHRD for projects in Zone E of SR-1 to the extent practicable, such as the planting of shrubs to shield views of surface parking lots and the use of LSHRD-recommended trees on the project property, including Mexican Fan Palm and *Podocarpus Henkelii* (Laguna Beach 2018b). Therefore, because the project is not located adjacent to a designated state scenic highway and would incorporate the recommendations of the LSHRD to the extent practicable, the project would not result in substantial damage to scenic resources in a state scenic highway. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The project is in an urban area of the City that is primarily developed with one- to three-story commercial and residential buildings. The project site is currently occupied by nine existing buildings which include hotel and restaurant uses, as well as associated surface parking lots, ancillary structures, and two pools. Vegetation on the project site includes palm trees, ornamental landscaping, hedges, and vines along the SR-1 frontage, as well as minimal ornamental landscaping throughout the project site. The project involves the internal and external remodel of the project site, the addition of a subterranean parking structure, a 15-guest room and pool/lounge addition to an existing building on the site, roadway improvements to Sleepy Hollow Lane, and landscaping and lighting improvements throughout.

Implementation of the proposed project would update the site's existing hotel buildings but would not substantially change the character or existing uses of the project site. While development of the project would somewhat modify the appearance site relative to existing conditions, it is not anticipated to degrade the existing visual character or quality of the site and, rather, it would improve its surroundings since it would update certain building characteristics, upgrade the existing landscaping and, enhance visual quality of the site and, therefore, contribute to an aesthetically-enhanced project area.

As discussed under *Impact b.*, above, and shown in Figure 4, the project would incorporate the design and landscaping recommendations of the LSHRD for the Central Laguna, Gaviota neighborhood and Zone E of SR-1 to the extent feasible. Project entitlements include a Design Review, Conditional Use Permit, Coastal Development Permit, and variance, which require discretionary review and approval of the project by the Planning Commission. City review would ensure that the project would align with regulations governing scenic quality. Upon approval of the project, the proposed remodeling activities and building addition would not degrade the existing visual character or quality of the site and its immediate surroundings and would be consistent with the City's envisioned visual character and quality of the project site. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

The project is in an urban area of the City that is primarily developed with commercial/retail, hotel/motel, and multi-family residential buildings. Existing lighting and glare sources in the project area consists of streetlights and exterior lighting/glare associated with the on-site hotel structures, surrounding residential and commercial/retail structures, and associated vehicles. Development of the proposed project would include upgrading existing exterior lighting with improved outdoor on-site lighting for the hotel buildings, internal walking paths, parking lot lights, landscaping/street frontage lights, and safety-related lighting. New lighting that is proposed as part of the project would replace existing lighting on the project site and would not represent a substantial increase in daytime and nighttime lighting. For these reasons, the proposed project would not result in a substantial new source of light such that day or nighttime views in the area would be adversely affected. Rather, the proposed exterior lighting and building materials would be consistent with those of surrounding uses and would be an important aide to public safety.

In addition, the project design does not propose any new highly reflective materials that could potentially cause significant glare during the day, such as stainless-steel panels or expansive glass windows. The design of this project, including its finish, colors, and materials, would be reviewed for approval through the City's review process. This regulatory procedure provides the City with an additional layer of review for aesthetics including light and glare, and an opportunity to incorporate additional conditions to improve the project's building materials and lighting plans. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)); timberland (as defined by PRC Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

The project site is developed with a hotel and ancillary uses and is located in an urbanized area of the City of Laguna Beach. There are no existing agricultural operations on the project site or in its vicinity. The project site is designated by the City of Laguna Beach's General Plan as Commercial/Tourist Corridor (CTC) and zoned Local Business District (C-1) and Commercial Hotel-Motel (CH-M) (Laguna Beach 2012). The project site is not zoned for agricultural use and is not under a Williamson Act contract. The California Department of Conservation's (DOC) Important Farmland Finder map shows that the project site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2020a). Therefore, the project would have no impact with respect to agricultural zoning or other conversion of farmland to non-agricultural use.

NO IMPACT

- c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*
- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

As discussed under Impact a. of this section, the project site is developed with a hotel and restaurant and is located within a commercial area of the City. The project site does not contain forest land or timberland. In addition, neither the project site nor the surrounding area is zoned for forest land or timberland. Accordingly, the proposed project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

NO IMPACT

- e. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

The proposed project would involve the remodel of existing hotel facilities and the construction of a new hotel building in a fully urbanized area. The proposed project does not include the conversion of farmland to non-agricultural uses, forest land to non-forest uses, nor any other change in the existing environment that could result in such effects. No impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The following section is based on the results of the Air Quality and Greenhouse Gas Emissions Study that was prepared for the proposed project (Rincon 2020a). The full Air Quality and Greenhouse Gas Emissions Study is provided in Appendix A of this document.

Air Quality Standards and Attainment

The project site is in the South Coast Air Basin (Basin), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether the standards are met or exceeded, the Basin is classified as being in “attainment” or “nonattainment.” Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The SCAQMD is in non-attainment for the federal standards for ozone and PM_{2.5} (particulate matter up to 2.5 microns in size) and the state standards for ozone, PM₁₀ (particulate matter up to 10 microns in size), and PM_{2.5}. The Los Angeles County portion of the Basin is also designated non-attainment for lead (SCAQMD 2016). The Basin is designated unclassifiable or in attainment for all other federal and state standards. The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 4.

Table 4 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). ^a
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma. ^a
Lead	(1) Short-term overexposures: lead poisoning can cause (a) anemia, (b) weakness, (c) kidney damage, and (d) brain damage; (2) long-term exposures: long-term exposure to lead increases risk for (a) high blood pressure, (b) heart disease, (c) kidney failure, and (d) reduced fertility.

^a More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: United States Environmental Protection Agency (U.S. EPA), Air Quality Criteria for Particulate Matter, October 2004.
Sources: U.S. Environmental Protection Agency (USEPA) 2018a; Centers for Disease Control and Prevention (CDC) 2019

Air Quality Management

Under State law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the District is in non-compliance. The SCAQMD administers the Air Quality Management Plan (AQMP) for the Basin, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recently adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board on March 3, 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017). The 2016 AQMP incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal 8-hour ozone standard of 0.070 ppm that was finalized in 2015.

The Final 2016 AQMP addresses several state and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The Southern California Association of Governments' (SCAG) projections for socio-economic data (e.g., population, housing, employment by industry) and transportation activities from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS) are integrated into the 2016 AQMP. This Plan builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency

planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The Plan also demonstrates strategies for attainment of the new federal eight-hour ozone standard and vehicle miles travelled (VMT) emissions offsets, pursuant to recent U.S. EPA requirements (SCAQMD 2017).

Air Emission Thresholds

The CEQA Guidelines (Section 15064.7) provide that, when available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make determinations of significance. These thresholds are designed such that a project that would not exceed the adopted thresholds would not have an individually or cumulatively significant impact on the Basin's air quality. Therefore, a project that does not exceed these SCAQMD thresholds would have a less than significant impact. This Initial Study conforms to the methodologies recommended in the SCAQMD's CEQA Air Quality Handbook (1993) and supplemental guidance provided by the SCAQMD, including recommended thresholds for emissions associated with both construction and operation of the project (SCAQMD 2019).

Table 5 presents the significance thresholds for construction and operational-related criteria air pollutant and precursor emissions being used for the purposes of this analysis. These represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the Basin's existing air quality conditions. For the purposes of this analysis, the proposed project would result in a significant impact if construction or operational emissions would exceed any of the thresholds shown in Table 5.

Table 5 SCAQMD Regional Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of ROG ¹	55 pounds per day of ROG
100 pounds per day of NO _x	55 pounds per day of NO _x
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO _x	150 pounds per day of SO _x
150 pounds per day of PM ₁₀	150 pounds per day of PM ₁₀
55 pounds per day of PM _{2.5}	55 pounds per day of PM _{2.5}

¹ Organic compound precursors of ozone are routinely described by a number of variations of three terms: hydrocarbons (HC), organic gases (OG), and organic compounds (OC). These terms are often modified by adjectives such as total, reactive, or volatile, and result in a rather confusing array of acronyms: HC, THC (total hydrocarbons), RHC (reactive hydrocarbons), TOG (total organic gases), ROG (reactive organic gases), TOC (total organic compounds), ROC (reactive organic compounds), and VOC (volatile organic compounds). While most of these differ in some significant way from a chemical perspective, two groups are important from an air quality perspective: non-photochemically reactive in the lower atmosphere, or photochemically reactive in the lower atmosphere (HC, RHC, ROG, ROC, and VOC). SCAQMD uses the term VOC to denote organic precursors.

Source: SCAQMD 2019

Localized Significance Thresholds

In addition to the above regional thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the CEQA Air Quality Handbook (1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and

have been developed for NO_x, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size. LSTs have been developed for emissions generated in construction areas up to five acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008a). As such, LSTs are typically applied only to construction emissions because most operational emissions are associated with project-generated vehicle trips.

Project construction would disturb no more than one acre during any given day. Therefore, this analysis conservatively utilizes the one-acre LSTs. LSTs are provided for receptors at distances of 82 to 1,640 feet from the project disturbance boundary. Construction activity would occur within approximately 20 feet south of the closest sensitive receptors, which include the multifamily residential building adjacent to the northwest of the project site, the multifamily residential building located between two parcels of the project site, and the single-family residential property located immediately south of the project site. According to the SCAQMD's Final LST Methodology, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet (SCAQMD 2008a). Therefore, the analysis below uses the LST values for 82 feet. The project is in SRA-20 (Central Orange County Coastal). LSTs for construction in SRA-20 on a one-acre site with a receptor 82 feet away are shown in Table 6.

Table 6 SCAQMD LSTs for Construction Emissions

Pollutant	Allowable Emissions from a 0.28-acre Site in SRA-20 for a Receptor 82 Feet Away
Gradual conversion of NO _x to NO ₂	92
CO	647
PM ₁₀	4
PM _{2.5}	3

SRA: source receptor area; NO_x: nitrogen oxides; NO₂: nitrogen dioxide; CO: carbon monoxide; PM₁₀: coarse particulate matter; PM_{2.5}: fine particulate matter
Source: SCAQMD 2008b

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The 2016 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local city general plans and the SCAG's 2016 RTP/SCS socioeconomic forecast projections of regional population, housing, and employment growth (SCAQMD 2017).

According to the California Department of Finance (DOF), the City of Laguna Beach has an estimated population of 23,343 (DOF 2020). The proposed project would involve the remodeling of an existing hotel complex, which would result in the addition of 25 rooms to the hotel complex. The proposed project would not directly increase the city's population as the purpose of this facility is to temporarily house visitors and, therefore, it would not generate permanent residents. In addition, the hotel would not add new employees as a result of the remodel. Therefore, the proposed project would not contribute to indirect population growth in the City through new employment.

The AQMP provides strategies and measures to reach attainment with the thresholds for 8-hour and 1-hour ozone and PM_{2.5}. As shown in Table 7 and Table 8 below, the proposed project would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (ROG and NO_x) and PM_{2.5}. Since the proposed project would not directly or indirectly increase the population within the City, the proposed project would be consistent with the AQMP and no impact would occur.

NO IMPACT

- b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

In accordance with CEQA Guidelines Section 15064(h)(3), the SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. If the project's mass regional emissions do not exceed the applicable SCAQMD, then the project's criteria pollutant emissions would not be cumulatively considerable.

As discussed under Air Quality Standards and Attainment, the Basin has been designated as a federal nonattainment area for O₃ and PM_{2.5} and a state nonattainment area for O₃, PM₁₀, and PM_{2.5}. The Los Angeles County portion of the Basin is designated in nonattainment for lead, as well. The Basin is designated unclassifiable or in attainment for all other federal and state standards. The proposed project does not include any stationary sources of lead emissions. Therefore, implementation of the project would not result in substantial emissions of lead and this pollutant is not discussed further in this analysis.

The following analysis evaluates air pollutant emissions generated by project construction and operation compared to the regional significance thresholds established by the SCAQMD in the CEQA Air Quality Handbook (1993), as well as the SCAQMD LSTs. Construction and operational air pollutant emissions were modeled using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2.

Construction Emissions

Project construction would generate temporary air pollutant emissions. These emissions are associated with fugitive dust and exhaust emissions from heavy construction vehicles, as well as ROGs released during the application of architectural coatings. Grading, excavation, hauling, and site preparation would involve the greatest use of heavy equipment and generation of fugitive dust.

Table 7 summarizes the estimated maximum daily emissions of pollutants associated with construction of the proposed project.¹ Emissions modelling accounts for compliance with the SCAQMD Rule 403, which regulates fugitive dust emissions during the project's demolition/relocation, grading, and construction activities to minimize emissions of PM₁₀ and PM_{2.5} and the SCAQMD Rule 1113, which regulates the volatile organic compound (VOC) content of architectural coatings to minimize emissions of ROGs during construction activities. As shown in Table 7, ROG, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} emissions would not exceed the SCAQMD regional thresholds or LSTs. Therefore,

¹ During preparation of the environmental documentation, after the Air Quality and Greenhouse Gas Emissions Study had been completed, the construction schedule was shifted back by five months. The length of the construction period and the number of days of demolition, site preparation, grading, building construction, paving, and architectural coating did not change. The shift in the construction schedule would not affect the results of the modeling.

emissions from project construction would be adequately controlled by existing regulations, and the project would not result in substantial air pollutant emissions. Because air pollutant emissions generated by project construction would not exceed the SCAQMD's regional significance thresholds or LSTs, project construction would not contribute substantially to an existing or projected air quality violation for which the region is in nonattainment. Impacts from construction emissions would be less than significant.

Table 7 Construction Emissions

	Maximum Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction Year 2021	4.4	23.1	17.7	<0.1	1.8	0.9
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Maximum On-site Emissions	4.1	14.5	15.9	<0.1	0.8	0.6
SCAQMD Localized Significance Thresholds (LSTs)	N/A	92	647	N/A	4	3
Threshold Exceeded?	N/A	No	No	N/A	No	No

Notes: See Appendix A for modeling results. Some numbers may not add up precisely due to rounding considerations. Maximum on-site emissions are the highest emissions that would occur on the project site from on-site sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.

Operational Emissions

Development of the project would result in long-term air pollutant emissions over the course of operations. Emissions include area sources, energy sources, and mobile emissions. Area sources include use of consumer products, use of gas-powered landscaping equipment, and re-application of architectural coating (re-painting). Energy sources include natural gas for uses such as heating/air conditioning, appliances, lighting, and water heating. Mobile emissions include vehicle trips (including employees, deliveries, and visitors).

Table 8 summarizes the estimated maximum daily emissions of pollutants associated with existing conditions and operation of the proposed project. Most project-related operational emissions would result from vehicle trips to and from the site. As shown in Table 8, operational emissions would not exceed the SCAQMD regional thresholds for criteria pollutants; therefore, the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. In addition, because criteria pollutant emissions and regional thresholds are cumulative in nature, the project would not result in cumulatively considerable operational emissions.

Table 8 Operational Emissions

Emission Source	Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	0.7	<0.1	<0.1	0	<0.1	<0.1
Energy	<0.1	0.3	0.2	<0.1	<0.1	<0.1
Mobile ¹	0.4	1.7	4.2	<0.1	1.3	0.3
Project Emissions	1.1	2.0	4.5	<0.1	1.3	0.4
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

¹ To account for the effects of the Part One Rule, CARB released off-model adjustment factors on November 20, 2019 to adjust criteria air pollutant emissions outputs from the EMFAC model. These off-model adjustment factors are applied by multiplying the emissions calculated for light- and medium-duty vehicles by the adjustment factor. With the incorporation of these adjustment factors, operational emissions generated by light-duty automobiles, light-duty trucks, and medium-duty trucks associated with project-related vehicle trips at the year 2025 would be approximately 0.2 percent greater for ROG, 0.7 percent greater for particulate matter, 0.2 percent greater for NO_x, and 0.7 percent greater for CO. These increases would have a negligible impact on overall operational emissions generated by the project and would not alter the significance of the project's operational emissions.

Notes: See Appendix A for modeling results. Some numbers may not add up precisely due to rounding considerations.

LESS THAN SIGNIFICANT IMPACT

c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015). Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools, hospitals, religious facilities, and daycare centers. The closest sensitive receptors include single-family residences located immediately east and west of the project site.

Local Carbon Monoxide (CO) Hotspots

A carbon monoxide (CO) hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 ppm or the federal and State eight-hour standard of 9.0 ppm (CARB 2016).

A detailed CO analysis was conducted during the preparation of SCAQMD's 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the SCAB, those which would be expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near the I-405 Freeway. The concentration of CO at this intersection was 4.6 ppm, which is well below the state and federal standards. The Wilshire

Boulevard/Veteran Avenue intersection has an annual average daily traffic (AADT) of approximately 100,000 vehicles per day.

According to California Department of Transportation (Caltrans) traffic counts on SR-1, the primary roadway by which the site is accessed, the AADT in the project vicinity is approximately 40,000 vehicles (Caltrans 2018). The Trip Generation and Access Analysis for the proposed project determined that the hotel remodel would add 245 daily trips to area roadways (LSA 2020a). With the proposed project, AADT on this segment would be 40,245 vehicles, which is much less than the 100,000-vehicle count on the Wilshire Boulevard/Veteran Avenue intersection that experiences CO concentrations well within federal and state standards. Furthermore, due to stricter vehicle emissions standards in newer cars and new technology that increases fuel economy, CO emission factors under future land use conditions would be lower than those under existing conditions. Thus, even though there would be more vehicle trips under the proposed project than under existing conditions, project-generated local mobile-source CO emissions would not result in or substantially contribute to concentrations that exceed the one-hour or eight-hour CO standard. Therefore, impacts would be less than significant.

Toxic Air Contaminants

Construction-related activities would result in short-term, project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a toxic air contaminant (TAC) by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2017a).

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately one year. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends in a household). OEHHA recommends this risk be bracketed with nine-year and 70-year exposure periods. Health risk assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015).

The maximum on-site PM_{2.5} emissions, which is used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. Maximum daily PM_{2.5} emissions during grading would be 0.6 pounds per day, which is well below the SCAQMD LST of three pounds per day that is designed to be protective of human health. While grading emissions represent the worst-case condition, such activities would only occur for about one month, approximately 8.5 percent of the overall construction period and less than one percent of the typical health risk calculation periods of nine years, 30 years, and 70 years. PM_{2.5} emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, given the aforementioned, DPM generated by project construction is not expected to create conditions where the probability that the Maximally Exposed Individual would contract cancer is greater than ten in one million or to generate ground-level

concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of the receiving location, each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, and architectural coatings. Such odors would disperse rapidly from the project site, generally occur at magnitudes that would not affect substantial numbers of people and would be limited to the construction period. Furthermore, construction would be required to comply with SCAQMD Rule 402, which regulates nuisance odors. Impacts associated with odors during construction would be temporary and less than significant.

With respect to operation, the SCAQMD's CEQA Air Quality Handbook (1993) identifies land uses associated with odor complaints as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Commercial uses are not identified on this list and no odor-producing uses are in the project vicinity. In addition, solid waste generated by the proposed on-site uses would be collected by a contracted waste hauler, ensuring that odors resulting from on-site waste would be managed and collected in a manner to prevent the proliferation of odors. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

The following analysis is based on the Biological Resources Assessment (BRA) memorandum, including a field reconnaissance survey, that was prepared for the proposed project (Rincon 2020b). The full memorandum is available in Appendix B of this document.

Existing Conditions

Land Cover

The entire survey area is developed and/or disturbed. Developed land includes areas that have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. It is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that often require irrigation (Oberbauer et al. 2008). Disturbed habitats have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or naturalized vegetation association but continue to retain a soil substrate. Typically, vegetation of disturbed areas, if present, is nearly exclusively composed of non-native plant species such as landscape ornamentals or ruderal exotic species that take advantage of disturbance and which removes any capability of providing viable natural habitat for uses other than dispersal (Oberbauer et al. 2008).

Within the survey area, the majority of the land is developed with the existing hotel, apartment buildings, residential dwellings, commercial businesses, parking lots and paved roadways. These areas contain ornamental landscaping (primarily palms and ficus) but do not support native vegetation. The western edge of the survey area includes disturbed areas between the existing developments and the Pacific Ocean which is comprised of a bare sand beach that is devoid of vegetation and frequently travelled by hotel guests and residences. No vegetation was observed on the disturbed beach areas. Refer to Attachment A for representative site photographs.

Soils

The project site contains two soil types: Myford sandy loam and Beaches. Myford sandy loam underlies the developed portions of the project site. Myford soils are deep, moderately well drained soils typically formed on terraces. However, much, if not all, of this soil type has likely been removed from development of the project site. Additionally, the majority of this area is covered by paved and other developed surfaces. Beach soils are found between the existing developed areas and the Pacific Ocean and are comprised of disturbed areas of bare sand that are devoid of vegetation and frequently subject to human activity. Beach soils are very shallow and shallow, well drained, moderately permeable soils that formed in residuum from hard, very fine grained, metamorphic sandstone (NRCS 2020).

Wildlife

The project site provides little habitat for wildlife species due to the developed and disturbed nature of the site, lack of native vegetation and high levels of human activity. Established ornamental trees and buildings in the survey area could provide nesting areas for common nesting birds protected under the California Fish and Game Code (CFGF) Section 3503 and the MBTA. Species observed on-site during the survey included rock pigeon (*Columba livia*), American crow (*Corvus brachyrhynchos*), house finch (*Haemorhous mexicanus*), California gull (*Larus californicus*), song sparrow (*Melospiza melodia*), and European starling (*Sturnus vulgaris*).

- a. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The project site is in an urban area and is currently developed with the Pacific Edge Hotel complex. In order to obtain comprehensive information regarding state and federally listed species, sensitive communities and federally designated Critical Habitat known to or considered to have potential to occur within the vicinity of the project site, queries of the U.S. Fish and Wildlife Service (USFWS) Critical Habitat Portal (USFWS 2020a), USFWS Environmental Conservation Online System (ECOS): Information, Planning and Conservation System (IPaC) (USFWS 2020b), USFWS National Wetland Inventory (NWI) (USFWS 2020c), California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (CDFW 2020), Natural Resources Conservation Service (NRCS) Web Soil Survey (NRCS 2020) and California Native Plant Society (CNPS) Online Inventory of Rare, Threatened and Endangered Plants of California (CNPS 2020) were conducted. In addition, the project site was surveyed in May 2020 to further assess the potential for special status species and plants and/or their habitats to occur on the project site.

The CNDDDB/CNPS query results include 28 special-status plant species within five miles (9-quadrant for CNPS) of the project site. Special-status plant species typically have specialized habitat requirements, including plant community types, soils and elevational ranges. No suitable habitat exists within the survey area for any of these plant species and all are classified as having no potential to occur on-site. No special-status plant species were observed during the site reconnaissance survey.

The CNDDDB query results include 21 special-status wildlife species within five miles of the project site. The potential for special-status wildlife species to occur on the site was assessed based on known distribution, habitat requirements, and existing site conditions; no special-status wildlife species were determined to have potential to occur on-site and similarly none were detected within or immediately surrounding the survey area during the site reconnaissance survey. The lack of potential for special-status wildlife species occurrence is based on low habitat quality in disturbed and developed areas of the site, lack of native vegetation, isolation from other suitable habitat due to developed land uses surrounding the site, and the presence of significant highway noise from adjacent SR-1. Therefore, the project is not expected to have a substantial adverse effect on any candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Nonetheless, ornamental trees and buildings on the project site have the potential to provide suitable nesting habitat for birds and raptors protected under Sections 3503, 3503.5, and 3513 of the CFGC and under the Migratory Bird Treaty Act (MBTA). Construction activities have the potential to harm protected birds either through direct contact with birds or their eggs, or through elevated noise levels in the surrounding area. Construction activities may negatively affect breeding or reproduction of birds on or adjacent to the project site. Therefore, Mitigation Measure BIO-1 would be required to reduce potential impacts to nesting birds from project construction to a less than significant level.

Mitigation Measure

BIO-1 Nesting Bird Avoidance

Prior to issuance of grading permits, the following measures shall be implemented:

- To avoid disturbance of nesting and special-status birds, including raptorial species protected by the MBTA and CFGC, activities related to the project, including, but not limited to, vegetation

removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of construction activities. The nesting bird pre-construction survey shall be conducted on foot inside the project site, including a 100-foot buffer, and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California.

- If nests are found, an avoidance buffer, as determined by the biologist, shall be demarcated by a qualified biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No parking, storage of materials, or construction activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.

Implementation of Mitigation Measure BIO-1 would avoid permanent impacts to nesting birds. Furthermore, during operation of the project, the site would implement trees as part of the project's landscaping and continue to provide nesting sites in an urban residential neighborhood, consistent with existing conditions.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?*

The entire project site is developed and/or disturbed and consists of an existing hotel with associated paved parking lots and ornamental landscaping, and the adjacent disturbed beach which is comprised of bare sand frequently subject to human activity. No vegetation was observed on the disturbed beach areas and no natural habitat areas are present on the project site. Further, the project would involve improvements to existing developed areas and would not involve any construction activities or development on the beach. Therefore, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

LESS THAN SIGNIFICANT IMPACT

- c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The entire project site is developed with the exception of the disturbed beach area between the existing development and the Pacific Ocean. The beach consists of bare sand devoid of vegetation and frequently subject to human activity. The beach areas within the western portion of the project site are mapped as Marine Intertidal Unconsolidated Shore by the NWI (USFWS 2020c). Based on a review of historic aerial imagery, the beach areas are semi-regularly flooded with changing ocean tides. These areas are likely under the jurisdiction of various regulatory agencies, including the CDFW, U.S. Army Corps of Engineers, and the Regional Water Quality Control Board, as a federal and state water and coastal resource. However, the project would involve improvements to existing developed areas and would not involve any construction activities or development on the beach. Two

geotechnical studies of bluff conditions and coastal landforms were completed for the project site (Geofirm 2019 and GeoSoils, Inc. 2019a; available in Appendix C). The reports indicate that the project site and surrounding vicinity have been significantly altered by development from as early as the year 1900. Furthermore, the reports conclude that the project site is within the terminus of a coastal canyon or valley and that there is not, nor has historically been, coastal bluff at the project site (Geofirm 2019 and Geosoils, Inc. 2019a). As such, a formal delineation was not conducted as no impacts to potentially jurisdictional beach areas are proposed. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Wildlife corridors are generally defined as connections between habitat areas that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover.

The project site is located in a developed urban area and surrounded by urbanized uses on three sides including commercial and residential development and heavily travelled paved roadways including SR-1. The western portion of the site consists of disturbed beach which connects to the north and south with adjacent beaches along the coastline of the Pacific Ocean. The open beach area may provide for localized movement of native wildlife species but is not expected to serve as a migratory wildlife corridor due to the high levels of human activity on the beach and in the surrounding areas. Further, the project would involve improvements to existing developed areas and would not involve any construction activities or development on the beach. Therefore, the project would not interfere with the movement of any native wildlife species. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

While the project site is located in the Coastal Zone, it is not located in or adjacent to any area designated by the Open Space/Conservation Element of the City's General Plan as potentially having high or very high value habitat (Laguna Beach 1984). Further, the project would involve improvements to existing developed areas and would not result in impacts to natural habitat areas. Construction of the proposed project would result in the removal of existing ornamental landscaping (including trees and shrubs), some of which may be located within the public right-of-way. Section 14.28 of the LBMC regulates tree trimming and removal of any City-owned street trees. While ornamental trees on the project site would not be protected under Section 14.28 of the LBMC, removal of trees within the public right-of way would be subject to the LBMC. Trimming or removal of trees within the public right-of-way would be completed in accordance with LBMC Section 14.28. Therefore, no conflict with local policies or ordinances protecting biological resources would occur. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The project is located within the plan area boundary for the County of Orange Central/Coastal Subregional Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) and the Orange County Transportation Authority NCCP/HCP. However, the project would involve improvements to existing developed areas and would not result in impacts to natural habitat areas. Therefore, the project would not conflict with the provisions these plans. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1) and tribal cultural resources (PRC Section 21074 [a][1][A]-[B]). Tribal cultural resources are discussed in Section 18, *Tribal Cultural Resources*, of this IS-MND.

A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CEQA Guidelines, Section 15064.5[a][1-3]).

A resource shall be considered historically significant if it:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
2. Is associated with the lives of persons important in our past
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC, Section 21083.2[a], [b]).

PRC, Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

The assessment provided below is based on the results of the Cultural Resources Assessment prepared for the proposed project (Treffers and Strother 2020). The assessment included historical maps and aerial imagery review, California Historical Resource Information System (CHRIS) records search at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, Native American consultation including a Sacred Lands File (SLF) search conducted by the Native American Heritage Commission (NAHC), a pedestrian field survey of the project site conducted in April 2020, archival research, and preparation of this report. The full Cultural Resources Assessment is available in Appendix D of this document.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

One building within the project site, the Driftwood Restaurant located at 619 Sleep Hollow Lane, was found eligible for listing in the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), and local designation. As such, it is considered a historical resource under Section 15064.5 of the CEQA Guidelines. The proposed project would remodel the interior of buildings, construct a new building adjacent to the Reef buildings, improve Sleepy Hollow Lane through infrastructure, landscaping, and other circulation improvements. None of these proposed actions would directly alter the exterior of the Driftwood Restaurant building. Although the proposed project would result in some modification to the building's setting, its surroundings have continually changed since the building was initially constructed in 1932; most notably these changes occurred prior to the building's original historical resources identification in 1981 when much of Sleepy Hollow Lane had already changed due to development in the post-World War II era. Therefore, the building would retain those physical characteristics which justify its historical resources eligibility. Therefore, the proposed project would have less than significant impacts to historical resources.

LESS THAN SIGNIFICANT IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Rincon requested a CHRIS records search at the SCCIC at California State University, Fullerton completed on April 27, 2020. The purpose of the records search was to identify previously recorded cultural resources, as well as previously conducted cultural resources studies within the project site and a 0.5-mile radius surrounding it. Results from the SCCIC were received on June 15, 2020. Rincon also reviewed the NRHP, CRHR, the California Historical Landmarks list, the California Points of Historical Interest list, Built Environment Resources Directory (or BERD) and the Archaeological Determination of Eligibility (ADOE) list.

The SCCIC records search identified a total of 16 previously conducted cultural resources studies, one of which is located within the project area and one of which is located adjacent to the project area, and 29 previously recorded cultural resources, none of which are located within the project site,

within a 0.5-mile radius of the project site. The cultural resources study previously conducted on the project site identified the Driftwood Kitchen Building as eligible for listing as a historic resource.

The CHRIS search did not identify any recorded archaeological resources on the project site. However, the SLF search returned positive results and, as further discussed in Section 18, Tribal Cultural Resources, the Juaneño Band of Mission Indians, Acjachemen Nation requested archaeological and Native American monitoring due to the project site's location within an area traditionally and culturally affiliated with the Tribe. Given the positive SLF search, Native American outreach, proximity to the Pacific Ocean and ethnographic settlement patterns of the Gabrieliño-Tongva and Juaneño, the area is considered sensitive for archaeological resources. Despite the developed nature of the project site, it is possible that subsurface archaeological deposits exist. Therefore, in order to avoid potential impacts to archaeological resources in the unlikely event that such resources are discovered during construction, Mitigation Measures CR-1 and CR-2 would be required.

Mitigation Measure

CR-1 Archaeological and Native American Monitoring

During initial ground disturbance for the project, a qualified archaeologist and locally affiliated Native American monitor shall monitor construction activities within the project site. Initial ground disturbance is defined as disturbance within previously undisturbed native soils. If, during initial ground disturbance, the qualified archaeologist determines that the construction activities have little or no potential to impact cultural resources (e.g., excavations are within previously disturbed, non-native soils, or within soil formation not expected to yield cultural resources deposits), the qualified archaeologist may recommend that monitoring be reduced or eliminated. If cultural resources are identified during initial monitoring, work in the immediate vicinity shall halt until the resource has been evaluated for significance. Should cultural resources be discovered during excavation, additional studies including data recovery efforts may be needed to reduce project impacts and/or consultation with local tribes and the City of Laguna Beach, acting as lead agency, may be necessary to mitigate any significant impacts.

CR-2 Unanticipated Discovery of Archaeological Resources

If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately by the construction manager to evaluate the find in consultation with the City's Planning Manager. The Planning Manager shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are determined to be prehistoric or Native American in origin. Work shall not resume until authorized by the City and the qualified archaeologist.

Implementation of Mitigation Measures CR-1 and CR-2 would reduce impacts to important archaeological resources, if any are discovered during project construction, to less than significant levels.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

The project site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains. There are no known human remains on the site. Therefore, human remains are not expected to be encountered during construction of the proposed project. In the unlikely event that human remains are encountered during project construction, State Health and Safety Code Section 7050.5 requires the project to halt until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to PRC Section 5097.98. Compliance with these regulations would ensure the proposed project would not result in significant impacts due to disturbing human remains, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The proposed project would use nonrenewable resources for construction and operation of the project. Natural resources that would be utilized by the project include petroleum-based fuels for vehicles and equipment, operational building energy usage, and operational water consumption. The anticipated use of these resources is detailed in the following subsections. As supported by the discussion below, the proposed project would not create energy demand that would result in a significant environmental impact.

Construction Energy Demand

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. The project would require demolition, site preparation and grading, pavement and asphalt installation, building construction, architectural coating, and new landscaping.

The total consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod Version 2016.3.2 (Appendix A). As shown in Table 9, construction equipment, hauling and vendor trips, and worker trips would consume approximately 84,992 gallons of fuel over the project construction period. Of this total, construction equipment would consume an estimated 80,013 gallons of fuel; vendor and hauling trips would consume approximately 575 gallons of fuel; and worker trips would consume approximately 4,404 gallons of fuel. These construction energy estimates are conservative, as they assume that the construction equipment used in each phase of construction is operating every day of construction.

Construction equipment would be maintained to applicable standards, and construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy

during construction, and the construction-phase impact related to energy consumption would be less than significant.

Table 9 Estimated Fuel Consumption during Construction

Fuel Type	Gallons of Fuel	MMBtu ⁴
Diesel Fuel (Construction Equipment) ¹	80,013	10,199
Diesel Fuel (Hauling and Vendor Trips) ²	575	73
Other Petroleum Fuel (Worker Trips) ³	4,404	483
Total	84,992	10,756

¹ Fuel demand rate for construction equipment is derived from the total hours of operation, the equipment's horsepower, the equipment's load factor, and the equipment's fuel usage per horsepower per hour of operation, which are all taken from CalEEMod outputs (Appendix A), and from compression-ignition engine brake-specific fuel consumptions factors for engines between 0 to 100 horsepower and greater than 100 horsepower (U.S. EPA 2018b). Fuel consumed for all construction equipment is assumed to be diesel fuel.

² Fuel demand rate for hauling and vendor trips is derived from hauling and vendor trip number, hauling and vendor trip length, and hauling and vendor vehicle class from "Trips and VMT" Table contained in Section 3.0, *Construction Detail*, of the CalEEMod results (Appendix A). The fuel economy for hauling and vendor trip vehicles is derived from the U.S. Department of Transportation (U.S. DOT) National Transportation Statistics (7.5 miles per gallon [mpg]) (U.S. DOT 2018). Fuel consumed for all hauling trucks is assumed to be diesel fuel.

³ The fuel economy for worker trip vehicles is derived from the U.S. DOT National Transportation Statistics (24.4 mpg) (U.S. DOT 2018). Fuel consumed for all worker trips is assumed to be gasoline fuel.

⁴ CaRFG CA-GREET 2.0 fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for worker trips specified above (CARB 2015). Low-sulfur Diesel CA-GREET 2.0 fuel specification of 127,464 Btu/gallon used to identify conversion rate for fuel energy consumption for construction equipment specified above (CARB 2015). Totals may not add up due to rounding.

Source: Air Quality/Greenhouse Gas Modeling Results (Appendix A)

Operational Energy Demand

Operation of the project would contribute to area energy demand by consuming electricity, natural gas, and gasoline consumption. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, water use, and the overall operation of the project. Gasoline consumption would be attributed to the trips generated from people visiting the hotel and restaurants and employees of the establishments. The estimated number of average daily trips associated with the project is used to determine the energy consumption associated with fuel use from operation of the project. The majority of the fuel consumption would be from motor vehicles traveling to and from the project site. According to CalEEMod calculations (Appendix A), the project would result in approximately 489,796 annual VMT. This is based on the most conservative estimate of daily trip generation determined in the Trip Generation and Access Analysis (TIA) prepared by LSA Associates, Inc. (LSA) in 2020 (Appendix I). Table 10 shows the project's estimated total annual fuel consumption using the estimated trip generation and VMT with the assumed vehicle fleet mix.

Table 10 Estimated Project Annual Transportation Energy Consumption

Vehicle Type ¹	Percent of Vehicle Trips ²	Annual Vehicle Miles Traveled ³	Average Fuel Economy (miles/gallon) ⁴	Total Annual Fuel Consumption (gallons)	Total Fuel Consumption (MMBtu) ⁵
Passenger Cars	55.21	270,422	24.4	11,083	1,217
Light/Medium Trucks	36.35	178,026	17.9	9,946	1,268
Heavy Trucks/Other	7.96	38,996	7.5	5,199	663
Motorcycles	0.48	2,352	44.0	53	6
Total	100	489,796	–	26,281	3,153

¹ Vehicle classes provided in CalEEMod do not correspond exactly to vehicle classes in DOT fuel consumption data, except for motorcycles. Therefore, it was assumed that passenger cars correspond to the light-duty, short-base vehicle class, light/medium trucks correspond to the light-duty long-base vehicle class, and heavy trucks/other correspond to the single unit, two-axle six-tire or more class.

² Percent of vehicle trips from Table 4.4 “Fleet Mix” in Air Quality and Greenhouse gas Emissions Study, CalEEMod output (Appendix A).

³ Mitigated annual VMT found in Table 4.2 “Trip Summary Information” in CalEEMod output (Appendix A).

⁴ U.S. DOT 2018

⁵ CaRFG fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for vehicle classes specified above (CARB 2015). Low-sulfur Diesel CA-GREET 2.0 fuel specification of 127,464 Btu/gallon used to identify conversion rate for fuel energy consumption for vehicle classes specified above (CARB 2015).

Notes: Totals may not add up due to rounding.

MMBtu: million British thermal units

Source: Air Quality/Greenhouse Gas Modeling Results (Appendix A)

As shown in Table 10, the project would consume approximately 26,281 gallons of fuel, or 3,153 MMBtu, each year for transportation uses from project operation under the most conservative estimate.

Project operation would consume approximately 0.30 gigawatt hours (GWh) of electricity per year (Appendix A). The project’s electricity demand would be served by Southern California Edison (SCE), which provided 85,276 GWh of electricity in 2018 (California Energy Commission [CEC] 2018a). The project’s electricity demand would represent less than 0.001 percent of electricity provided by SCE. Therefore, SCE would have sufficient supplies for the project. Estimated natural gas consumption for the project would be 1,053 MMBtu, or 0.01 MMthm, per year (Appendix A). The project’s natural gas demand would be serviced by Southern California Gas Company (SoCal Gas), which provided 5,156 MMthm per year in 2018 (CEC 2018b). The project’s natural gas consumption would represent less than 0.01 percent of natural gas provided by SoCal Gas; which would therefore have adequate supply to serve the project.

The proposed project would be required to comply with all standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California’s Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and

each iteration is more energy efficient than the previous standards. Furthermore, the project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with state requirements through Senate Bill (SB) 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

In conclusion, construction of the proposed project would be temporary and typical of similar projects, and would not result in the wasteful, inefficient, or unnecessary consumption of energy. Operation of the project would consume fuel, natural gas, and electricity; however, the proposed project would conform to the latest version of California's Green Building Standards Code and Building Energy Efficiency Standards, and would therefore not lead to wasteful, inefficient, or unnecessary consumption of energy resources. In addition, SCE and SoCal Gas have sufficient energy supplies to serve the project. Therefore, the proposed project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

As discussed above, SB 100 mandates 100 percent clean electricity for California by 2045. Because the project would be powered by the existing electricity grid, the project would eventually be powered by renewable energy mandated by SB 100 and would not conflict with this statewide plan. Additionally, as discussed above, the project would be subject to more stringent energy efficiency standards pursuant to updated CALGreen requirements.

The City of Laguna Beach adopted the Laguna Beach Climate Protection Action Plan (CPAP) in 2009 (Laguna Beach 2009). The goal of the plan was to reduce GHG emissions seven percent below 1990 levels by 2012. The CPAP is geared towards City government action, such as City outreach to local businesses and residents to encourage sustainable practices, the adoption of local guidance and policies to reduce energy and water use, and the adoption of practices to reduce GHG emissions in government operations. Therefore, the CPAP is limited in its application to the proposed project.

However, the CPAP does contain a chapter on increasing the sustainability of commercial operations within the City. Measures in the CPAP from this chapter that apply to the proposed project include incorporating green building features and long-term energy efficiency improvements for hot and cold weather conditions. The project would include sustainability features such as low-flow water fixtures, room occupancy sensors, EnergyStar appliances, LED lighting, and water efficient landscaping and would comply with the latest CALGreen standards. The proposed new building would be constructed in accordance with all Title 24 requirements, while renovated buildings would have older appliances, lighting, water fixtures, and mechanical, electrical, and plumbing systems upgraded as needed to reduce electricity and water consumption. The project's sustainability features and compliance with CALGreen would increase energy efficiency within the buildings, which would align with the CPAP goals and recommendations for commercial businesses. Therefore, the proposed project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☒	☐
2. Strong seismic ground shaking?	☐	☐	☒	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
4. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

- a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

The project site is located in a seismically active region of Southern California; however, there are no known faults on the project site and the nearest known active fault is approximately 14 miles north of the project site in Huntington Beach (DOC 2020b). The project site is not located within an Alquist-Priolo earthquake fault zone as delineated by the State Geologist (DOC 2020b). Furthermore, ground breakage has not been observed along the faults of the Newport-Inglewood Zone in historic times (Southern California Earthquake Data Center 2020). The project would comply with State of California standards for building design through the California Building Standards Code (California Code of Regulations, Title 24) which requires various measures of all construction in California to account for hazards from seismic shaking. The impact to people, buildings, or structures on the project site from fault rupture would be reduced by the required conformance with applicable building codes, and accepted engineering practices. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

As described above, the project is located 14 miles south of the Newport-Inglewood fault zone, which has the potential to create substantial ground shaking if a seismic event occurred along that fault. Similarly, a strong seismic event on any other fault system in Southern California has the potential to create considerable levels of ground shaking throughout the City. However, the project site is not subject to unusual levels of ground shaking and the project does not involve uses, such as mining or fracking, that are known to cause or exacerbate ground shaking.

To reduce geologic and seismic impacts, the City regulates development through the requirements of the California Building Code (CBC). The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. The earthquake design requirements of the CBC consider the occupancy category of the structure, site class, soil classifications, and various seismic coefficients. The CBC provides standards for various aspects of construction, including but not limited to excavation, grading, earthwork, construction, preparation of the site prior to fill placement, specification of fill materials, fill compaction and field testing, retaining wall design and construction, foundation design and construction, and seismic requirements. It includes provisions to address issues such as (but not limited to) construction on expansive soils and soil strength loss. In accordance with California law, project design and construction would be required to comply with provisions of the CBC. Because the project would comply with the CBC and because the project would not exacerbate existing ground shaking hazards, impacts related to seismically induced ground shaking would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction is a phenomenon in which saturated silty-to-cohesionless soil above the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic stresses induced by an earthquake. These soils may acquire a high degree of mobility and lead to structurally damaging deformations. Liquefaction begins below the water table, but after liquefaction has developed, the groundwater table will rise and cause the overlying soil to mobilize. Liquefaction typically occurs in areas where groundwater is less than 30 feet from the surface and where the soils are composed of poorly consolidated fine- to medium-grained sand. In addition to the necessary soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to initiate liquefaction.

According to the California Geologic Survey (CGS) Earthquake Zones of Required Investigation map, portions of the site to the west of Sleepy Hollow Lane are at risk for liquefaction (CGS 2020). Therefore, there is the potential for liquefaction or seismic settlement on portions of the project site, including the portion of the site where the New Reef building would be constructed. A Geotechnical Investigation was prepared for the proposed project by Petra, which includes recommendations for the proposed new building include construction with a bedrock foundation system in order to mitigate risks of liquefaction (Petra 2019; Appendix E). The New Reef Building would be constructed according to the recommendations of the Geotechnical Investigation and the requirements of the CBC, including Chapter 18, which specifies foundation requirements for sites with liquefiable or unstable soils. Therefore, the project would not create or exacerbate liquefaction potential and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

According to the CGS, the project site is not located in an area subject to landslides caused by earthquakes, nor is it downslope from an area subject to seismically induced landslides (CGS 2020). The project site is relatively flat, with elevations ranging from 10 to 20 meters above mean sea level. Therefore, the risk of earthquake-induced landslides at the project site is low and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Ground-disturbing activities associated with project implementation may result in the removal of some topsoil during construction. Standard construction best management practices (BMPs) would be implemented in order to avoid or minimize soil erosion associated with ground-disturbing activities. As discussed further in Section 10, Hydrology and Water Quality, implementation of erosion control measures stated in LBMC Section 22.17.010, Construction Project Erosion and Sediment Control Maintenance Requirements, as well as adherence to requirements provided in the National Pollutant Discharge Elimination System (NPDES) permit for construction activities would avoid or minimize potential impacts. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?*
- d. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

As discussed under *Impact a.3.* of this Section, portions of the project site are underlain by unstable soils that are subject to liquefaction. In addition, the Geotechnical Investigation determined that soils underlying the project site are considered expansive and are subject to lateral spreading. However, the Geotechnical Investigation concluded that the underlying soil and geologic conditions of the subject property are considered suitable for the proposed construction provided that the conclusions and recommendations of the Geotechnical Investigation are incorporated into the design criteria and project specifications. As discussed under Description of Project, recommendations include the compaction of the upper 12 inches of soil to at least 95 percent, premoistening of soils prior to laying concrete, and the use of bedrock foundation (Petra 2019; Appendix E). Therefore, with adherence to the recommendations of the Geotechnical Investigation during project constructions, impacts related to unstable and expansive soils would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

The project would not include the installation of new septic tanks or alternative wastewater disposal systems. No impact would be associated with wastewater conveyance.

NO IMPACT

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The paleontological sensitivities of the geologic units underlying the project site were evaluated in order to determine if activity conducted under the proposed project could result in significant impacts to paleontological resources. The analysis was based on the results of an online paleontological locality search and review of existing information in the scientific literature concerning known fossils within geologic units mapped within the project site. Fossil collections records from the Paleobiology Database and University of California Museum of Paleontology (UCMP) online database were reviewed for known fossil localities in Orange County (Paleobiology Database 2020; UCMP 2020). Based on the available information contained within existing scientific literature and the UCMP database, paleontological sensitivities were assigned to the geologic units underlying the project site. The potential for impacts to scientifically important paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units. The Society of Vertebrate Paleontology (SVP) has developed a system for assessing paleontological sensitivity and describes sedimentary rock units as having high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources (SVP 2010). This system is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present.

The project site is situated within the Coastal Fringe subarea of the northern Peninsular Ranges geomorphic province, one of 11 major provinces in the state (CGS 2002). These provinces are

“naturally defined geologic regions that display a distinct landscape or landform” (CGS 2002). The Peninsular Ranges trend northwest-southeast and extend 900 miles from the Los Angeles Basin to the tip of Baja California in Mexico. The province varies from 30 to 100 miles wide and is bounded on the east by the Colorado Desert and on the west by the coastal plain and the Gulf of California (Norris and Webb 1990). The Coastal Fringe geomorphic subarea encompasses a broad coastal shelf traversed by Pacific Coast Highway, which consists of headlands, cliffs and associated sea arches, beaches, and rock prominences. The coastal shelf is generally smooth and is composed of young, poorly consolidated sands and clays (Laguna Beach 1995).

As depicted in Figure 8, the surface geology of the project site is mapped as Quaternary young (late Holocene) marine deposits (Qm), Quaternary old (late to middle Pleistocene) paralic deposits, units 2-6 (Qop2-6), and Miocene Topanga Group, undifferentiated (Tt) (Morton and Miller 2006).

Quaternary young (late Holocene) marine deposits (Qm): Late Holocene marine sediments, mapped within the southern and western portions of the project site, consist of unconsolidated, active or recently active fine to medium-grained sandy beach deposits. Locally, late Holocene marine deposits are interbedded with Quaternary old (late to middle Pleistocene) paralic deposits (Qop2-6) (Morton and Miller 2006).

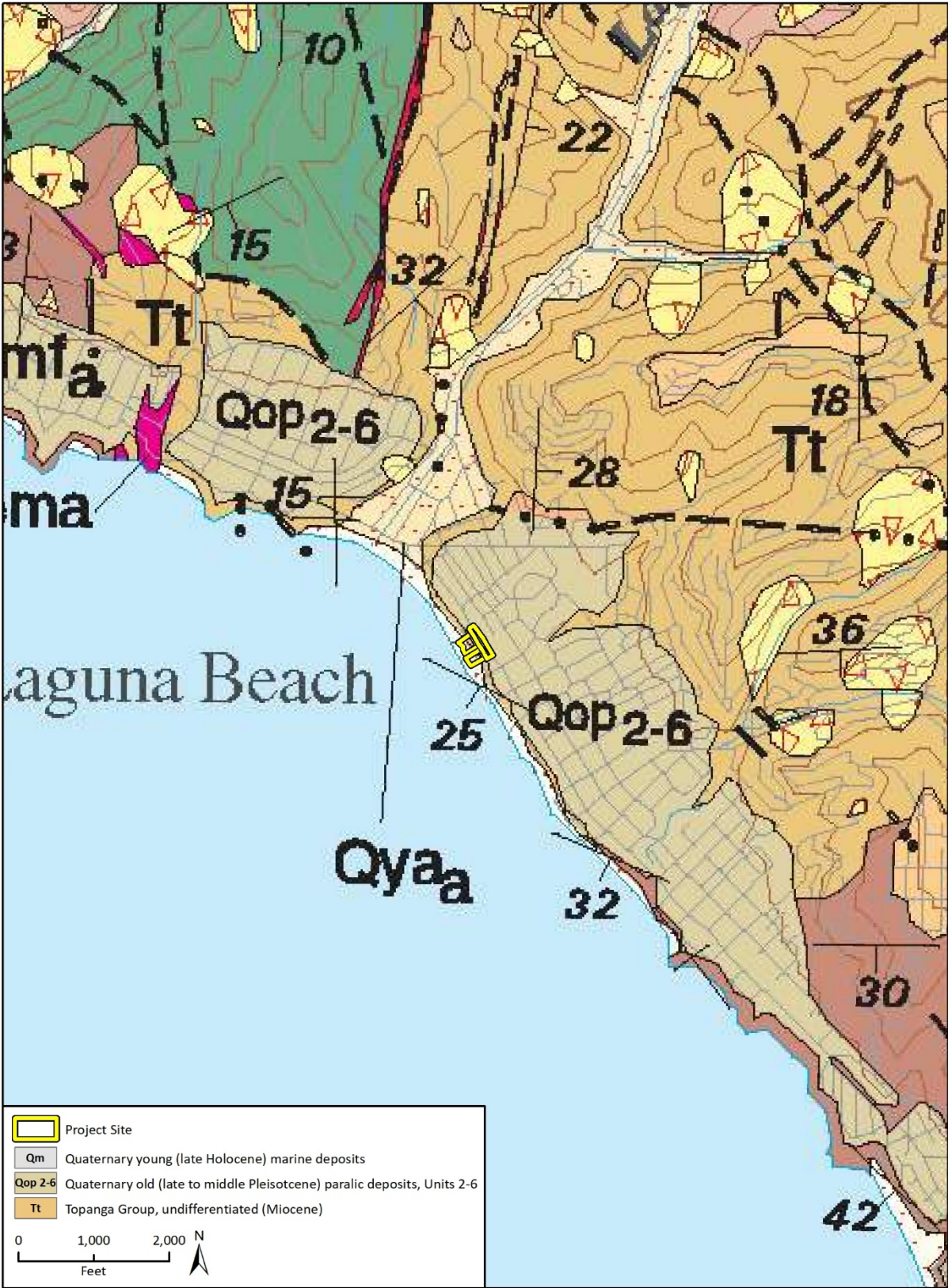
Quaternary old (late to middle Pleistocene) paralic deposits, Units 2-6 (Qop2-6): Late to middle Pleistocene paralic deposits, mapped within the northern and eastern portions of the project site, consist of interfingering strandline, beach, estuarine and colluvial deposits composed of dark reddish brown to brown, dense to very dense, fine- to medium-grained, silty to clayey sandstone with interbedded siltstone, sandstone and conglomerate. Locally, paralic deposits may also be interbedded with old alluvial deposits of Pleistocene-age (Morton and Miller 2006).

Miocene Topanga Group, undifferentiated (Tt): The Topanga Group, mapped in the central portion of the project site, is up to 20,000 feet (6,100 meters) thick and consists of reddish brown to orange marine sedimentary deposits. Locally, subunits of the Topanga Group include fine-grained beach sandstone, shelf sandstone, and siltstone of the Topanga Formation and basal conglomerate (Morton and Miller 2006).

A review of the museum records maintained in the UCMP online collections database identified a vertebrate fossil locality (V7005) from early Holocene to late Pleistocene alluvial deposits in an unspecified location in Orange County, which yielded a horse (*Equus*) tooth (UCMP 2020). In addition, the UCMP online collections database reports two vertebrate fossil localities (V72060 and V1056) from the Topanga Group; which produced fossil specimens of dugong (*Dioplotherium allisoni*), a hippopotamus-like mammal (*Desmostylus Hesperus*), mackerel shark (*Isurus tumulus*), and white shark (*Carcharodon tembloris*) in unspecified locations within Orange County (UCMP 2020).

Late Holocene sedimentary deposits within the project site (e.g., Qm) are typically too young (i.e., less than 5,000 years old) to preserve paleontological resources and are determined to have a low paleontological sensitivity, increasing with depth (SVP 2010). However, exposures of older deposits/formations near the project site, and the stratigraphic setting in the vicinity are indicative that Pleistocene and Miocene (i.e., Qop2-6- and Tt) units underlie the late Holocene units mapped at the surface, at unknown, but potentially shallow depths (Morton and Miller 2006). Accurately assessing the boundaries between late Holocene units (i.e., Qm) and Pleistocene (i.e., Qop2-6) or Miocene (Tt) units is generally not possible without site-specific stratigraphic data, some form of radiometric dating, or fossil analysis.

Figure 8 Surface Geology of the Project Site



The depths at which these units become old enough to yield fossils is highly variable, but generally does not occur at depths of less than five (5) feet based on the proximity of geologic units with high paleontological sensitivity (i.e., Qop2-6 and Tt) mapped near project areas underlain by late Holocene marine deposits (Qm) (Morton and Miller 2006). Refer to Figure 9 for the paleontological sensitivity of the project site.

Quaternary old (early Holocene to Pleistocene) alluvial sediments have a well-documented record of abundant and diverse vertebrate fauna throughout California. Localities have produced fossil specimens of mammoth (*Mammuthus columbi*), horse (*Equus*), camel (*Camelops*), and bison (*Bison*), as well as various birds, rodents, and reptiles (Agenbroad 2003; Jefferson 1985, 2010; Merriam 1911; Paleobiology Database 2020; Savage 1954; UCMP 2020). Therefore, Quaternary old (late to middle Pleistocene) paralic deposits, Units 2-6 (Qop2-6) are assigned a high paleontological sensitivity.

As described above, sedimentary deposits within the Topanga Group have yielded numerous fossilized vertebrate faunas within Orange County (UCMP 2020). Vertebrate fossils have also been reported from the Topanga Formation including specimens of horse (*Parapliohippus carrizoensis*), whale, sea lion, and shark (Koch et al. 2004; Morton and Miller 2006; Paleobiology Database 2020). Consequently, the Miocene Topanga Group is also assigned a high paleontological sensitivity.

The project site is in an urban area and has been previously developed. However, project ground disturbance associated with the subterranean garage is proposed to reach depths of up to 26 feet below ground surface, which would likely extend below the boundary between artificial fill and native (i.e., previously undisturbed) sediments within the project site. The location of the proposed subterranean garage is mapped as late Holocene marine deposits (low paleontological sensitivity) and Miocene Topanga Group (high paleontological sensitivity). If native/intact sediments or geologic units with a high paleontological sensitivity (i.e., Qop2-6 and Tt units shown in Figure 8 and Figure 9) at the surface and shallow subsurface are disturbed, impacts to paleontological resources could occur. Construction activities may result in the destruction, damage, or loss of undiscovered paleontological resources. Therefore, impacts to paleontological resources would be potentially significant. Implementation of Mitigation Measure GEO-1 during project construction would reduce potential impacts related to paleontological resources to a less than significant level by providing for the recovery, identification, and curation of previously unrecovered fossils. Impacts would be less than significant with mitigation.

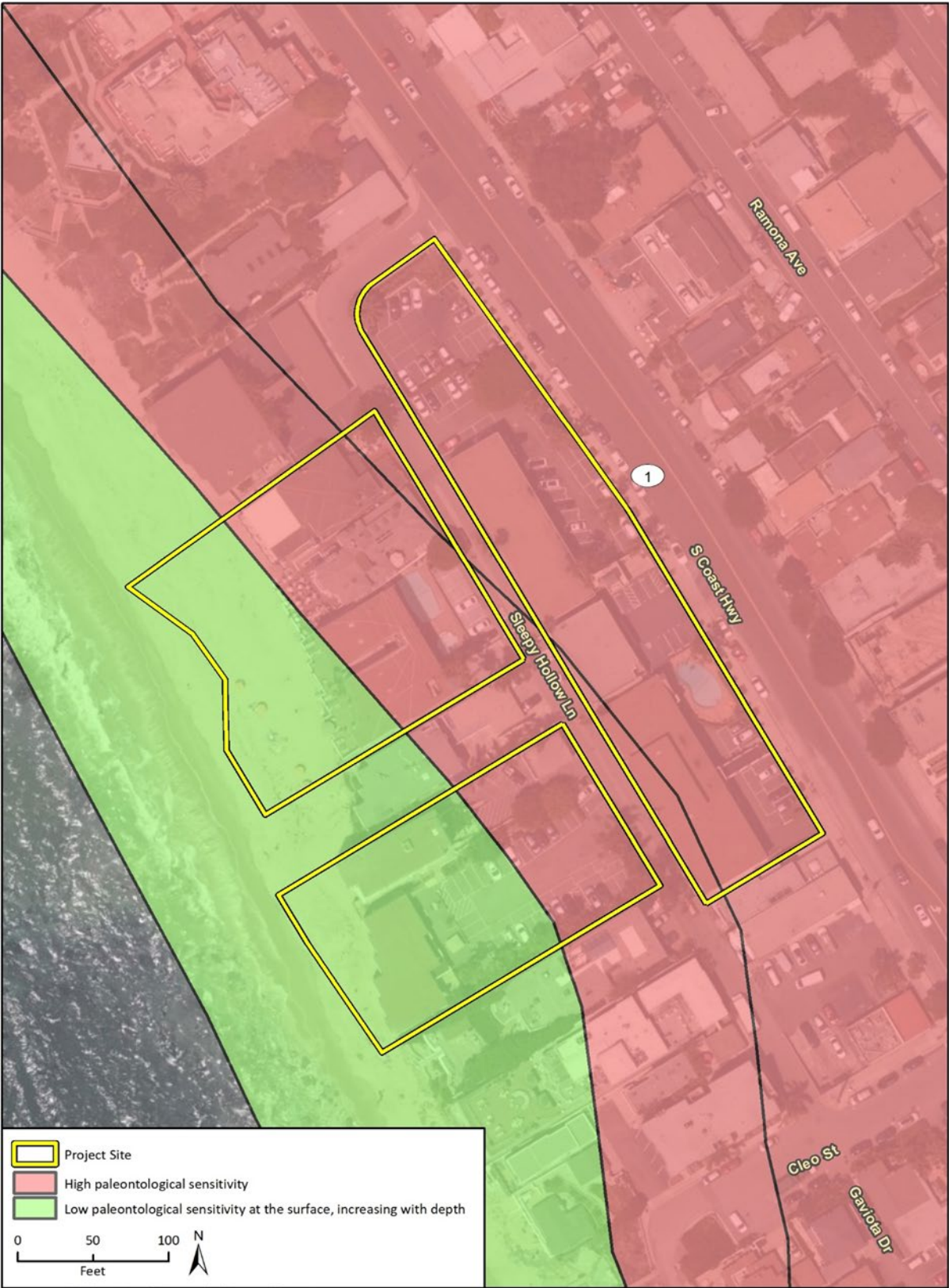
Mitigation Measure

GEO-1 Paleontological Resources Monitoring

Prior to the commencement of project construction, a qualified paleontological monitor (i.e., a paleontologist who meets the SVP [2010] standards as a Paleontological Resource Monitor) shall be retained to conduct paleontological monitoring during ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) of intact (i.e., previously undisturbed) Qop2-6 and Tt geologic units, located on the northern and eastern portions of the project site (Figure X and XX). Monitoring shall be supervised by a Qualified Paleontologist (i.e., a paleontologist who meets the SVP [2010] standards as a Qualified Professional Paleontologist).

Full-time monitoring shall be conducted for all ground-disturbing activities associated with excavations for the subterranean garage, and all ground disturbance within project areas underlain by geologic units with high paleontological sensitivity (i.e., inland of Sleep Hollow Lane). These project activities have a high potential of disturbing impact native, previously undisturbed geologic units including Quaternary old (late to middle Pleistocene) paralic deposits, Units 2-6 (Qop2-6) and

Figure 9 Paleontological Sensitivity of the Project Site



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Additional data provided by USGS, Morton, D.M., and Miller, F.K., 2006.

Miocene Topanga Group (Tt), which have a high paleontological sensitivity. If Quaternary old paralic deposits (Qop2-6) and Miocene Topanga Group (Tt) are not observed at the full depth of excavations associated with the subterranean garage, monitoring can be discontinued. Ground-disturbing activities that impact previously disturbed sediments only do not require paleontological monitoring.

The duration and timing of the monitoring shall be determined by the Qualified Paleontologist. If the Qualified Paleontologist determines that full-time or part-time monitoring is no longer warranted, he or she may recommend reducing monitoring to periodic spot-checking or may recommend that monitoring cease entirely. Monitoring shall be reinstated if any new ground disturbances of previously undisturbed areas are required, and reduction or suspension shall be reconsidered by the Qualified Paleontologist at that time.

If a paleontological resource is discovered, the monitor shall have the authority to temporarily divert construction equipment around the find until it is assessed for scientific significance and collected. Once salvaged, significant fossils shall be prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County [NHMLAC] or UCMP). Curation fees are the responsibility of the project owner.

A final report shall be prepared describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to City. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.

Implementation of Mitigation Measure GEO-1 would reduce potential impacts to paleontological resources to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

This section is based on the results of the Air Quality and Greenhouse Gas Emissions Study prepared for the project (Rincon 2020a). The full study is provided in Appendix A of this document.

Climate Change and Greenhouse Gases

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, and CH₄ results from off-gassing associated with agricultural practices and landfills.

Different types of GHGs have varying global warming potentials (GWPs), which are the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the GHG emissions, referred to as carbon dioxide equivalent (CO₂e), and is the amount of a GHG emitted multiplied by its GWP. CO₂ has a 100-year GWP of one. By contrast, CH₄ has a GWP of 25, meaning its global warming effect is 25 times greater than that of CO₂ on a molecule per molecule basis (IPCC 2007).

The accumulation of GHGs in the atmosphere regulates Earth's temperature. Without the natural heat-trapping effect of GHGs, the Earth's surface would be about 34 degrees Celsius (°C) cooler (CalEPA 2006). However, emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of GHGs in the atmosphere beyond the level of naturally occurring concentrations.

Greenhouse Gas Emissions Inventory

Worldwide anthropogenic emissions of GHGs were approximately 46,000 million metric tons (MT) of CO₂e in 2010. CO₂ emissions from fossil fuel combustion and industrial processes contributed about 65 percent of total emissions in 2010 (IPCC 2014).

Total U.S. GHG emissions were 6,456.7 million MT of CO₂e in 2017. In 2017, the industrial and transportation end-use sectors accounted for 30 percent and 29 percent, respectively, of GHG emissions (with electricity-related emissions distributed). The residential and commercial end-use sectors accounted for 15 percent and 16 percent of GHG emissions, respectively. Since 1990, U.S. emissions have increased at an average annual rate of 0.05 percent (USEPA 2019a).

Based on CARB's California Greenhouse Gas Inventory for 2000-2016, California produced 429.4 million MT of CO₂e in 2016, which meets the goal of AB 32 of achieving 1990 GHG emission levels (431 million MT CO₂E) by 2020 (CARB 2018). The largest source of GHGs in California is transportation, contributing 41 percent of the state's total GHG emissions. The industrial sector is the second largest source, contributing 23 percent of the state's GHG emissions. Electric power accounted for approximately 16 percent of the total emissions (CEC 2017).

Regulatory Setting

California Regulations

The State of California considers GHG emissions and the impacts of climate change to be a serious threat to the public health, environment, economic well-being, and natural resources of California, and has taken an aggressive stance to mitigate its impact on climate change through the adoption of policies and legislation. CARB is responsible for the coordination and oversight of state and local air pollution control programs in the state. California has numerous regulations aimed at reducing the state's GHG emissions; some of the major initiatives are summarized below.

ASSEMBLY BILL 32

California's major initiative for reducing GHG emissions is outlined in Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006," which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MT CO₂e. The Initial Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the First Update to the Scoping Plan (First Update). The First Update defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 statewide goals. The First Update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the Initial Scoping Plan. It also evaluated how to align the State's longer-term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

SENATE BILL 32

On September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, extending the California Global Warming Solutions Act of 2006 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030. On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies, such as SB 350 and SB 1383 (see below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the First Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of six MT CO₂e by 2030 and two MT CO₂e by 2050 (CARB 2017b). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but may not be appropriate for specific individual projects (CARB 2017b).

SENATE BILL 375

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. SCAG was assigned targets of an eight percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

Regional Regulations

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG)

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and State air quality requirements, including the Transportation Conformity Rule and other applicable federal, State, and air district laws and regulations. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, the goals of regional and State air quality plans to attain NAAQS. In addition, SCAG is a co-producer with the SCAQMD of the transportation strategy and transportation control measure sections of the AQMP for the Basin. Regarding future growth, SCAG adopted the 2016 RTP/SCS in April 2016, which provides population, housing, and employment projections for cities under its jurisdiction (SCAG 2016). The growth projections in the 2016 RTP/SCS are based in part on projections originating under county and city general plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2016 AQMP.

On May 7, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS (titled Connect SoCal) for federal transportation conformity purposes and will consider approval of the full plan and for all other purposes within 120 days of this date. The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation (SCAG 2020).

Local Regulations

CITY OF LAGUNA BEACH CLIMATE PROTECTION ACTION PLAN

The City of Laguna Beach adopted the Laguna Beach Climate Protection Action Plan (CPAP) in 2009 (Laguna Beach 2009). The goal of the plan was to reduce GHG emissions seven percent below 1990 levels by 2012. The plan provides recommendations for achieving the GHG emissions reduction, including increasing energy efficiency, increasing the use of public transit and active transportation, and providing public outreach and education. The CPAP is geared towards City government action, such as City outreach to local businesses and residents to encourage sustainable practices, the adoption of local guidance and policies to reduce energy and water use, and the adoption of practices to reduce GHG emissions in government operations. Therefore, the CPAP is limited in its application to projects and activities outside of government operations.

However, the CPAP does contain a chapter on reducing GHG emissions from commercial operations within the City, which as the goals of providing information to local businesses about how to achieve GHG emissions reductions, encouraging the business community to participate in programs for energy conservation, and publicizing the accomplishments of local businesses in GHG emissions reductions. Measures in the CPAP that apply to commercial businesses include incorporating green building features when improvements or new construction occurs and implementing long-term energy efficiency improvements for both cold and hot weather conditions.

CITY OF LAGUNA BEACH GENERAL PLAN

The Land Use Element of the General Plan includes the goal to "Create a community that is sustainable, resilient, and regenerative", which intends to guide the city towards a more sustainable future through a reduction in GHG emissions and conservation of natural resources (Laguna Beach 2012). To achieve this goal, the Land Use Element includes the following policies and actions related to GHG emissions:

Policy 1.1 Reduce greenhouse gas (GHG) emissions 80% below 1990 levels by 2050.

Action 1.1.1 Protect natural assets and open-space areas to maintain their role as "carbon sinks."

Action 1.1.2 Revise and update the Transportation, Circulation, and Growth Management Element and continue to encourage and promote the use of mass transit and other high-occupancy vehicles, bicycling walking, and telecommuting as a means to reduce the City's greatest local contributor to global warming.

Action 1.1.3 Create a Sustainability/Conservation Element with policies that promote energy and resource efficiency, water efficiency, conservation, recycling, and the protection of ground and surface waters.

Action 1.1.4 Support technology and business practices that enable people to reduce vehicle miles traveled from home to work. These include the use of home office and technology such as wireless communication and video conferencing.

Action 1.1.5 Support State and/or Federal action to implement vehicle emission standards that would reduce greenhouse gas emissions.

Action 1.1.6 Evaluate and consider eliminating or significantly reducing the cost of parking permits for fuel-efficient or alternative-fuel vehicles.

Action 1.1.7 Make fuel efficiency and clean air important criteria in the acquisition of all city vehicles, including fire engines, buses, trucks, etc., and for non-specialty uses consider instituting a policy of purchasing only highly fuel-efficient or alternative-fuel vehicles.

Action 1.1.8 Continue to offer incentives to businesses that encourage employees to use buses, bikes, and carpools (or vanpools) to commute to work. Facilitate telecommuting and/or allow employees to work extended hours for fewer days per week.

Action 1.1.9 Maintain the existing free trolley/bus service and pursue extension throughout the year.

Action 1.1.10 Coordinate with surrounding cities and governmental agencies to maximize the use of public transportation including buses and metro line.

Action 1.1.11 Work with the Laguna Beach Unified School District and private schools to promote the use of clean bus or trolley transportation and discourage the use of private vehicles for trips to and from school.

Action 1.1.12 Provide public education and information about options for reducing greenhouse gas emissions.

Action 1.1.13 Encourage preservation of historic structures and adaptive reuse of buildings.

Action 1.1.14 Establish a City climate-friendly purchasing procedure.

Action 1.1.15 Evaluate establishing lighting and "dark sky" ordinances.

Policy 1.2

Support design strategies and construction standards that maximize use of alternative energy sources and passive solar architecture in buildings.

Action 1.2.1 Modify building codes and design guidelines to permit, encourage, and/or require integration of passive solar design, green roofs, active solar, and other renewable energy sources and/or provide incentives for development projects that meet or exceed silver LEED certification or better (or equivalent standards, if developed by the State).

Action 1.2.2 Revise or eliminate zoning and development standards that act as a barrier to use of renewable energy systems (except for standards required to assure protection of coastal resources).

Action 1.2.3 Construct and renovate public facilities to demonstrate green building practices and renewable energy systems.

Action 1.2.4 Establish incentives to encourage installation of renewable energy systems by homeowners and businesses including, but not limited to, the installation of energy-rated appliances, programmable thermostats, solar-electric and solar-thermal systems, cool roofs and roofing materials, and sustainable landscaping.

Action 1.2.5 Require, where feasible, all new buildings to be designed and oriented to take maximum advantage of the sun and wind for natural heating and cooling.

Action 1.2.6 Require developers and contractors to take action to minimize greenhouse gas emissions by using low-emission vehicles and equipment.

Action 1.2.7 Ensure that all development projects and major remodels implement sustainable landscaping strategies such as use of low or ultra-low water use plants and non-invasive plants.

Action 1.2.8 Evaluate establishing an air conditioning "carbon offset" fee for all permits.

Policy 1.3 Support planning and design solutions that reduce water consumption and implement water conservation practices.

Action 1.3.1 Continue to equip all city restrooms with low-flow toilets.

Action 1.3.2 Encourage or require the use of xeriscape in new construction and major remodels.

Action 1.3.3 Review existing ordinances to allow/encourage water reuse in public and private construction and remodels.

Methodology

GHG emissions associated with the proposed project were calculated using CalEEMod (see Appendix A for CalEEMod worksheets).

Construction Emissions

Project construction would primarily generate temporary criteria pollutant and GHG emissions from construction equipment operation on-site, construction worker vehicle trips to and from the site, and from export of materials off-site. Construction input data for CalEEMod include, but are not limited to: (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; (3) areas to be excavated and graded; and (4) volumes of materials to be exported from and imported to the project site. The analysis assessed maximum daily emissions from individual construction activities, including demolition, site preparation, grading, building construction, paving, and architectural coating. Construction would require heavy equipment during demolition, site preparation, grading, building construction, and paving for construction of the New Reef Building, demolition of the pool and construction of the new porte cochère at the building located at 633-635 Sleepy Hollow Lane, and repaving and restriping of existing parking lots and Sleepy Hollow Lane. Emissions associated with the interior remodeling and landscape and exterior lighting update components of the project were not modeled because the remodel would primarily be completed using small hand tools, and not large emission-generating construction equipment.

Construction equipment estimates are based on surveys of construction projects within California conducted by members of CAPCOA.

The quantity, duration, and the intensity of construction activity influences the amount of construction emissions and their related pollutant concentrations that occur at any one time. The emission forecasts modeled for this report reflect conservative assumptions where a relatively large amount of construction is occurring in a relatively intensive manner. If construction is delayed or occurs over a longer period, emissions could be reduced because of (1) a more modern and cleaner-burning construction equipment fleet mix than assumed in the CalEEMod, and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

CalEEMod has the capability to calculate reductions in construction emissions from the effects of dust control, diesel-engine classifications, and other selected emissions reduction measures. Emissions calculations assume application of water during grading and a 15-mph speed limit on unpaved surfaces in compliance with SCAQMD Rule 403, Fugitive Dust). Based on CalEEMod version 2016.3.2, the PM₁₀ and PM_{2.5} reduction for watering two times per day is 55 percent.

Pursuant to SCAQMD guidance, total construction GHG emissions resulting from the project are amortized over 30 years and added to operational GHG emissions.

Operational Emissions

CalEEMod calculates operational emissions of CO₂, CH₄, and N₂O associated with energy use, area sources, waste generation, water use and conveyance. CalEEMod also calculates emissions of CO₂ and CH₄ generated by project-generated vehicle trips (i.e., mobile sources). However, CalEEMod does not calculate N₂O emissions from mobile sources; therefore, N₂O emissions were quantified separately using guidance from CARB (see Appendix A for calculations). Because the project would be operational post 2020, 2030 was inputted and modeled for the project's operational year, in order to provide a more accurate comparison to 2030 targets per SB 32. Further, because the existing uses on the site would be demolished, existing operational emissions were subtracted from the proposed project's, to account for the net increase.

Significance Thresholds

The majority of individual projects do not generate sufficient GHG emissions to create significant project-specific environment effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited (CEQA Guidelines Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether or not a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

Section 15064.4 of the CEQA Guidelines recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7[c]). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130[f]). As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions." Therefore, a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.

The SCAQMD proposed a quantitative screening limit of 3,000 MT CO₂e as an indicator of projects small enough that they would not interfere with the region in achieving its GHG emissions reduction targets (SCAQMD 2010). While the screening limit was based on well-founded pollutant reduction strategies, it is not clear the recommended screening limit is adequate to achieve GHG reduction targets set by SB 32 (i.e., 40 percent below 1990 emissions) and Executive Order S-3-05 (80 percent below 1990 levels by 2050). Therefore, as indicated in CEQA Guidelines Section 15064.4, in a good-faith effort, and based "to the extent possible on scientific and factual data", this analysis describes the sources and provided estimates of the amount of greenhouse gas emissions resulting from a project and compares the emission to 3,000 MT CO₂E screening criteria for informational purposes.

However, in the absence of any adopted numeric threshold, the significance of the project's GHG emissions are primarily evaluated based on CEQA Guidelines Section 15064.4(b) and the consideration of whether the project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the AB 32 Climate Change Scoping Plan, the 2017 Scoping Plan, the 2016-2040 RTP/SCS, the City's General Plan, and the City's CAP.

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Construction Emissions

As shown in Table 11, construction activity for the project would generate an estimated 288.6 MT CO₂e. When amortized over a 30-year period, construction of the project would generate approximately 9.6 MT CO₂e per year.

Table 11 Estimated Construction Emissions of Greenhouse Gases

Construction Year	Annual Emissions MT CO ₂ e
2021	288.6
Total	288.6
Amortized over 30 years	9.6

Notes: See Appendix A for modeling results. Some numbers may not add up precisely due to rounding considerations.

Operational and Total Project Emissions

Table 12 combines the construction and operational GHG emissions associated with development of the project. As shown, annual emissions from the proposed project would be 296.3 MT CO₂e/year. These emissions would not exceed the 3,000 MT CO₂e/year threshold. Therefore, combined project construction and operational GHG emissions would have a less than significant impact.

Table 12 Combined Annual Emissions MT CO₂e/year

Emission Source	Annual Emissions MT CO ₂ e
Amortized Construction	9.6
Operational	
Area	<0.1
Energy	105.1
Solid Waste	4.1
Water	0.9
Mobile	
CO ₂ and CH ₄	171.1
N ₂ O	5.5
Net Total	296.3
SCAQMD Threshold (MT CO ₂ e/ year)	3,000
Exceed Project-Specific Threshold?	No

Notes: Emissions modeling was completed using CalEEMod, except for N₂O mobile emissions which were calculated separately (see Section 3.1 for methodology). See Appendix A for modeling results and N₂O emissions calculations. Some numbers may not add up precisely due to rounding considerations.

Regional and local GHG reduction policies and regulations most applicable to the project are those found in the 2017 State Scoping Plan, the Laguna Beach CPAP, and the City General Plan.

Consistency with 2017 Scoping Plan

The principal state plan and policy is AB 32, the California Global Warming Solutions Act of 2006, and the follow up, SB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020 and the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. Pursuant to the SB 32 goal, the 2017 Scoping Plan was created to outline goals and measures for the state to achieve the reductions. The 2017 Scoping Plan's goals include reducing fossil fuel use and energy demand and maximizing recycling and diversion from landfills. The project would be consistent with these goals through project design, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and installing energy-efficient LED lighting in the renovated and new indoor spaces, occupancy sensors, flow-smart showerheads, water-efficient faucets and toilets, Energy Star certified appliances, and water efficient landscaping and irrigation systems. Buildings remodeled as part of the proposed project will have improved energy and water use efficiencies upon completion of the renovations, and the new building constructed as part of the proposed project would meet all Title 24 requirements. Therefore, the project would be consistent with the 2017 Scoping.

Consistency with Laguna Beach Climate Protection Action Plan

The CPAP is geared towards City government action, such as City outreach to local businesses and residents to encourage sustainable practices, the adoption of local guidance and policies to reduce energy and water use, and the adoption of practices to reduce GHG emissions in government operations. Therefore, the CPAP is limited in its application to the proposed project.

However, the CPAP does contain a chapter on reducing GHG emissions from commercial operations within the City. Measures in the CPAP from this chapter that apply to the proposed project include incorporating green building features and long-term energy efficiency improvements for hot and cold weather conditions.

The project would include sustainability features such as low-flow water fixtures, room occupancy sensors, EnergyStar appliances, LED lighting, and water efficient landscaping and would comply with CALGreen standards. The proposed new building would be constructed in accordance with all Title 24 requirements, while renovated buildings would have older appliances, lighting, water fixtures, and mechanical, electrical, and plumbing systems upgraded as needed to reduce electricity and water use. The project's sustainability features and compliance with CALGreen include a number of measures to increase energy efficiency within buildings that align with the CPAP goals and recommendations for commercial businesses.

Consistency with City General Plan

Relevant GHG policies and action items discussed in the City General Plan Land Use Element are addressed in Table 13, below. A majority of the action items are activities to be undertaken by the local government; therefore, there are limited GHG reduction action items that apply to the project. As shown in the table, the project would be consistent with the applicable strategies and policies in the City General Plan.

Table 13 Laguna Beach General Plan Consistency Analysis

General Plan GHG Policies and Action Items	Project Consistency
Reduce greenhouse gas (GHG) emissions 80% below 1990 levels by 2050.	Consistent. The project would include sustainability features such as EnergyStar appliances, room occupancy sensors, LED fixtures, and low-flow fixtures that would reduce resource consumption and GHG emissions.
Support design strategies and construction standards that maximize use of alternative energy sources and passive solar architecture in buildings.	Consistent. The proposed New Reef building would be prewired for a solar ready roof and would include exterior window screens to passively moderate internal temperatures. All buildings where new sliding glass doors and windows are being replaced will be done so with dual pane, Low E glass per Title 24 Energy requirements.
Support planning and design solutions that reduce water consumption and implement water conservation practices.	Consistent. Project landscaping would include drought tolerant plants such as agave and Kentia palm and would be irrigated through a low-flow system with an automatic timer with seasonal adjustment capacity to apply less water during the rainy season.
Establish incentives to encourage installation of renewable energy systems by homeowners and businesses including, but not limited to, the installation of energy-rated appliances, programmable thermostats, solar-electric and solar-thermal systems, cool roofs and roofing materials, and sustainable landscaping.	Consistent. The project would include EnergyStar appliances and sustainable landscaping and irrigation.
Ensure that all development projects and major remodels implement sustainable landscaping strategies such as use of low or ultra-low water use plants and non-invasive plants.	Consistent. Project landscaping would include drought tolerant plants and would be irrigated through a combination of low-volume spray heads, bubblers, and drip systems that would be controlled by an automatic timer with a seasonal adjustment capacity to apply less water during rainy periods. In addition, landscaping and irrigation plans would be prepared in accordance with the California Model Water Efficient Landscape Ordinance.
Encourage or require the use of xeriscape in new construction and major remodels.	Consistent. Project landscaping would include drought tolerant plants such as agave, Kentia palm, and mousehole tree and would utilize a water-saving irrigation system.
Require developers and contractors to take action to minimize greenhouse gas emissions by using low-emission vehicles and equipment.	Consistent. The proposed project will use electric golf carts for guest and luggage transport and any future fleet vehicles for the hotel would be low-emission vehicles.

Source: Laguna Beach 2012

As discussed above, construction and operation of the proposed project would not generate GHG emissions that would have a significant impact on the environment, nor would the proposed project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based on information from the Phase I Environmental Site Assessment (ESA) prepared for the proposed project (TA-Group DD, LLC [TAGDD] 2020). The full Phase I ESA can be found in Appendix F of this document.

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Project construction would involve the temporary use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. However, standard construction BMPs for the use and handling of such materials would avoid or reduce the potential for such conditions to occur. Any use of potentially hazardous materials utilized during construction of the project would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials and risk of spills would cease after construction is completed.

Operation and maintenance of the proposed project would likely involve the use of common household materials such as cleaning and degreasing solvents, fertilizers, and pesticides. In addition, chemicals, such as chlorine, for the maintenance of the hotel pools would also potentially be stored on site in minor quantities. These and other materials used in the regular maintenance of the building and landscaping would also be utilized in the secondary activities associated with the hotel and restaurant uses. Use of these materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. The transport, use, and storage of hazardous materials during construction of the project would be subject to all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

As described above, construction of the project would involve the use of potentially hazardous materials such as vehicle fuels and fluids that could be released should an accidental leak or spill occur. However, as further discussed in Section 10, *Hydrology and Water Quality*, the Stormwater Pollution Prevention Plan (SWPPP) for the proposed project would include standard construction BMPs for the use and handling of such materials to avoid or reduce the potential for such conditions to occur. The transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Adherence to these requirements would reduce potential impacts related to construction activities to a less than significant level.

Operation of the hotel and restaurants would not involve the use or storage of significant quantities of hazardous materials and any pool chemicals stored onsite would be kept in a locked, protective cabinet or closet. Furthermore, the Phase I ESA conducted for the proposed project determined that there is no evidence of ongoing or past presence of hazardous substances or petroleum products or the release of such products on the project site (TAGDD 2020). Therefore, project operations are not

anticipated to create a significant hazard to the public or environment through the accidental release of hazardous materials. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The nearest school is the Laguna Beach Montessori School, located approximately 770 feet southeast of the project site. During construction of the proposed project, hazardous and potentially hazardous materials would be utilized for the transport and operation of vehicles and machinery. As discussed above, the transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. As discussed under Impact a. of this section, the construction of the project, and associated air pollutant emissions, would be temporary and less than significant. Furthermore, operation and maintenance of the proposed project would likely involve the use of common household materials comparable to those materials already in use in the project site vicinity. Therefore, emissions or hazardous materials releases near the Laguna Beach Montessori School would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The Phase I ESA included a search of databases compiled pursuant to Government Code Section 65962.5. In addition, the Laguna Beach Fire Department (LBFD) and Orange County Health Care Agency Environmental Health (OCHCA) were contacted for information regarding the project site (TAGDD 2020). The Phase I ESA determined that the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Furthermore, the Phase I ESA revealed no known or suspect Recognized Environmental Conditions (RECs)², Controlled RECs (CREC)³, Historical REC (HREC)⁴, or even *De Minimis Conditions*⁵ on the project site. The Phase I ESA identified two Leaking Underground Storage Tank (LUST) cleanup sites located within 0.1 mile of the project site but determined that the sites do not pose an environmental risk to the project site based on the release information, regulatory oversight, and/or closed status of these release cases (TAGDD

² A REC is defined by the American Society for Testing and Materials (ASTM) as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment (TAGDD 2020).

³ A CREC is defined by ASTM as a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (e.g., as evidenced by the issuance of a NFA letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., property use restrictions, AULs, institutional controls, or engineering controls) (TAGDD 2020).

⁴ A HREC is defined by ASTM as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted residential use criteria established by a regulatory authority, without subjecting the property to any required controls (e.g., property use restrictions, AULs, institutional controls, or engineering controls).

⁵ *De Minimis Conditions* include environmental concerns identified which may warrant discussion but do not qualify as RECs.

2020). Therefore, impacts related to hazardous material sites near the proposed project would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- e. *For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

The project site is not located within two miles of a public airport or within an airport land use plan (Orange County Airport Land Use Commission 2008). The airport nearest to the project site is the John Wayne Airport, located approximately 10 miles northeast of the project site. Furthermore, there are no private airstrips in the vicinity of the project site. Therefore, the project would not result in safety or noise hazards related to airports for people residing or working at the project site and its vicinity. No impact would occur.

NO IMPACT

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The project would not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Construction activities have the potential to temporarily impact traffic and vehicle speeds on SR-1 and Sleepy Hollow Lane; however, these impacts would be temporary and access to these roadways would not be blocked by project construction. Furthermore, the applicant would coordinate with the City to ensure appropriate construction staging areas and adequate vehicular and pedestrian access on adjacent roadways.

Operation of the project would not require the development of additional streets or introduce new features that would interfere with or obstruct an adopted emergency response plan. Implementation of the project could incrementally increase traffic to and from the project site. Additionally, as discussed further in Section 17, *Transportation*, operation of the project would not result in a significant increase in daily trips to the site and the project site is surrounded by major roadways, including SR-1, which has sufficient capacity to provide access to and from the project site. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- g. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

The project site is in an urban area of the City of Laguna Beach. Undeveloped wildland areas are not located in proximity to the project site. According to the California Department of Forestry and Fire Protection (CalFIRE) the project site is not located in or near a Very High Fire Hazard Severity Zone (VHFHSZ) for wildland fires (CalFIRE 2011). The nearest VHFHSZ is located approximately 0.25 mile north of the project site and is separated from the project site by intervening urban development and roadways. Therefore, the project would not expose people or structures to a significant risk of loss injury or death involving wildland fires. No impact would occur.

NO IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation onsite or offsite;	☐	☐	☒	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite;	☐	☐	☒	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The existing site is entirely developed and is surrounded by residential and commercial uses in a highly urbanized area. Drainage is collected in existing paved parking lots and at downspouts on existing structures. Stormwater is then directed to the City's existing stormwater system via curb gutters at near the corner of the Cleo Street/SR-1 intersection. Currently, 77 percent of the project site is covered in impervious surface. The proposed project would add new areas of landscaping throughout the project site, including within the proposed new patio area that would replace an existing parking lot, and would reduce impervious surfaces on the site to 72 percent (PSOMAS 2019; see project submittal package). In addition, the proposed project would include a Low-Impact Development (LID) biofiltration raised planter boxes that would receive water from underdrains throughout the project site and would provide enough storage and filtration capacity to meet the South Orange County Model Water Quality Management Plan (WQMP) requirements (PSOMAS 2019; see project submittal package). Therefore, upon completion, the proposed project would not be anticipated to increase existing stormwater flows off the site or affect water quality.

Implementation of the project would require disturbing portions of the project site, including excavation, grading, and construction activities. As stormwater flows over a construction site, it can pick up sediment, debris, and chemicals, and transport them to receiving water bodies. The nearest receiving water body is the Pacific Ocean located immediately west of the project site; however, construction activities would be limited to the project site and not occur on the beach. The proposed project would be required to comply with all established regulations under the National Pollution Discharge Elimination System (NPDES) permitting program to control both construction and operation stormwater discharges. Under the permit, the project applicant would be required to eliminate or reduce non-stormwater discharges to waters of the nation, develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for project construction activities, and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the SWPPP. Further, the applicant would be required to implement all applicable source control BMPs to reduce water-quality impacts as listed under the NPDES permit.

The project would also be required to would be required to comply with LBMC Chapter 22.17, Construction Project Erosion and Sediment Control Maintenance Requirements. The LBMC requires that all construction projects implement erosion controls and BMPs, monitor and evaluate their performance after each rainstorm event, and revise and repair sediment control systems as needed. In addition, LBMC Chapter 16.01, Water Quality Control, requires project plan and BMP review prior to the issuance of construction permits and may impose additional BMPs or other requirements to ensure that the project would not adversely impact water quality. As required by the LBMC and NPDES permit, construction activities on the project site would use a series of BMPs to reduce erosion and sedimentation and the construction contractor would be required to operate and maintain these controls throughout the duration of construction. Furthermore, construction and operation of the proposed project would be required to adhere to the BMP and LID measures contained within the project's Water Quality Management Plan (WQMP) included in the Applicant's entitlement approval requests, which would undergo City review and approval. Because the proposed project would not increase impermeable surface area on the project site and would comply with all applicable local and federal stormwater drainage requirements, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The proposed project would not increase impermeable surfaces on the project site and would therefore not reduce groundwater infiltration compared to existing conditions. Water supply in the area is provided by Laguna Beach County Water District (LBCWD), which sources approximately half of its water from imported water provided by the Metropolitan Water District of Southern California (MWD) and half from groundwater pumped from the Santa Ana Basin (LBCWD 2019). According to the 2015 Urban Water Management Plan (UWMP), LBCWD expects to be able to provide reliable water supplies for an average year, single dry year, and multiple dry years for its existing and planned supplies (LBCWD 2016). As discussed further in Section 19, *Utilities and Service Systems*, LBCWD would have sufficient water supply to provide for the proposed project's water use. Therefore, the proposed project would not impede groundwater infiltration at the project site and project water use would not result in significant depletion of groundwater supplies. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(i) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or offsite?*

The project site is generally flat, with minimal elevation change across the site and does not contain any streams, rivers, or other drainage features. The project site is developed with commercial buildings and surface parking lots and is almost entirely paved with impermeable surfaces. The proposed project would not increase hardscaping on the project site compared to existing conditions and would add new areas of landscaping throughout the project site, including within the proposed new patio area that would replace an existing parking lot. Therefore, runoff leaving the project site with implementation of the proposed project would not be significantly altered compared to existing conditions. Furthermore, as listed under the *Impact a.* of this section, the proposed project would comply with the City's urban runoff requirements as stated in the LBMC, including preparation and implementation of a WQMP, which would reduce the quantity and level of pollutants in runoff leaving the project site. Therefore, impacts related to erosion and siltation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(ii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?*
- c.(iv) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

The project site is developed with hotel and restaurant buildings and surface parking lots and is almost entirely paved with impermeable surfaces. The proposed project includes the remodel of existing hotel buildings, the construction of a new hotel building with subterranean parking garage on a portion of the project site currently serving as a surface parking lot, repaving of existing parking lots and Sleepy Hollow Lane, and other minor changes to ancillary structures. As discussed under *Impact*

a. of this Section, the proposed project would reduce hardscaping on the project site compared to existing conditions and would add new areas of landscaping and bioretention BMPs throughout the project site. Therefore, the volume of runoff from the site when compared to existing conditions would not be substantially altered. In addition, any runoff from the site would be conveyed into the existing drainage system and the project would not substantially change the site's drainage patterns and would not alter a stream, river or other drainage course in a manner that would result in flooding or redirect flood flows. The proposed project would not increase runoff such that flooding would occur, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(iii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The project site is generally flat, with minimal elevation change across the site. The project site does not contain any streams, rivers, or other drainage features. The project site is developed with commercial buildings and is almost entirely paved with impermeable surfaces. As previously discussed, the project would not increase runoff from the project site compared to existing conditions. As discussed under *Impact a.* of this section, the proposed project would comply with the City's urban runoff requirements as stated in the LBMC, including the preparation and adherence to an approved WQMP, which would reduce the quantity and level of pollutants in runoff leaving the project site. Therefore, the proposed project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

The project site is not located near any dams, levees, or other inland bodies of water that could produce seiche impacts at the project site. The dam nearest to the project site is the Sepulveda Dam approximately 60 miles to the northwest; therefore, the project site is not at risk of flooding due to dam failure. The project site is located approximately 50 feet from the Pacific Ocean. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the project site is classified as Zone X (Area of Minimal Flood Hazard) and is not located in a 100-year flood zone (Map # 06059C0417K) (FEMA 2019). A Coastal Hazards and Wave Runup and Overtopping Analysis was prepared for the proposed project, which determined the following (GeoSoils Inc. 2019b; Appendix G):

- The beach adjacent to the project site is underlain by erosion resistant sand and rock, indicating that beach erosion does not pose a significant hazard at the project site
- Even with anticipated sea level rise over the next 75 years, the structures on the project site would not be subject to flooding at high tide
- The very back of the buildings located west of Sleepy Hollow Lane lie within the California Office of Emergency Services (CalOES) tsunami inundation map, which are based on the worst-case inundation scenarios (i.e., a 0.1 percent event)

While there is the potential for a tsunami to impact portions of the project site, as discussed under Section 9, *Hazards and Hazardous Materials*, operation of the proposed project would not involve the storage or use of significant quantities of hazardous materials. Therefore, there is minimal risk of release of pollutants due to project inundation and impacts would be less than significant.

NO IMPACT

- e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Potential water quality impacts associated with the project are discussed above under *Impacts a.* and *b.* The project would not otherwise substantially degrade water quality. Impacts would be less than significant.

NO IMPACT

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11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

a. Would the project physically divide an established community?

The proposed project would involve the remodel of existing hotel buildings and the construction of a new hotel building and ancillary structures on the existing Pacific Edge Hotel property. The project does not include any new roads or infrastructure that have the potential to divide any established communities. No impact would occur.

NO IMPACT

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed project would involve the remodel of existing hotel buildings and amenities and the construction of a new hotel building on a site currently designated Commercial/Tourist Corridor (CTC), which provides for visitor-serving facilities such as hotels, restaurants, theaters, museums, and beach-related retail (Laguna Beach 2012). The project site includes two zoning designations, Local Business District (C-1) on APNs 644-021-01 through -05 and Commercial Hotel-Motel (CH-M) on APNs 644-022-02, 644-022-04, 644-022-06, 644-022-07, 644-022-16, and 644-022-17. The proposed project would maintain existing hotel and restaurant uses on the project site, which are permitted under the existing General Plan Land Use designation and zoning designations. Therefore, the proposed project would not conflict with any land use plan, policy, or regulation and there would be no impact.

LESS THAN SIGNIFICANT IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Mineral Resources Setting

The project site is located in a residential area with no mineral resource extraction activities in the vicinity. The project site is mapped with a MRZ-3 designation, indicating that the area has undetermined mineral resource significance (DOC 1983).

- a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- b. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

The project site and surrounding properties are located in an urbanized area. The California Surface Mining and Reclamation Act of 1975 (SMARA) was enacted to promote conservation and protection of significant mineral deposits. According to the California Department of Conservation Mineral Land Classification Maps, the project site is located in an area with a MRZ-3 designation, indicating that the area has undetermined mineral resource significance (DOC 1983). There are no known mineral resources on the project site or in the vicinity of the site and the surrounding commercial and residential land uses are not compatible with mineral extraction. Therefore, the project would have no impact on the availability or recovery of mineral resources.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The following assessment is based on the results of the Noise and Vibration Study prepared for the proposed project (Rincon 2020c). The full Noise and Vibration Study is located in Appendix H of this report.

Noise

The unit of measurement used to describe a noise level is the decibel (dB). However, the human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called “A weighting” is used to adjust actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz, thus filtering out noise frequencies that are not audible to the human ear. A weighting approximates the frequency response of the average young ear when listening to most ordinary everyday sounds. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the “A-weighted” levels of those sounds. Therefore, the A-weighted noise scale is used for measurements and standards involving the human perception of noise. In this analysis, all noise levels are A-weighted, and “dBA” is understood to identify the A-weighted decibel.

Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that an increase (or decrease) of 5 dBA (8 times [or one eighth] the sound energy) is readily perceptible; and that an increase (or decrease) of 10 dBA (10.5 times [or approximately one tenth] the sound energy) sounds twice (or half) as loud (Crocker 2007).

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used for this analysis are the one-hour equivalent noise level (L_{eq}) and the community noise equivalent level (CNEL).

- The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. L_{max} is the highest Root Mean Squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007).
- The CNEL is a 24-hour equivalent sound level with an additional 5 dBA penalty to noise occurring during evening hours, between 7:00 p.m. and 10:00 p.m., and an additional 10 dBA penalty to noise occurring during the night, between 10:00 p.m. and 7:00 a.m., to account for the added sensitivity of humans to noise during these hours (Caltrans 2013). Quiet suburban areas typically have a CNEL in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 70+ CNEL range.

Propagation

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. The way sound reduces with distance depends on factors such as the type of source (e.g., point or line), the path the sound will travel, site conditions, and obstructions. Sound levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Sound from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013).

Vibration

Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The vibration frequency of an object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body is from a low of less than 1 Hz up to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise may result in adverse effects, such as building damage, when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz). Vibration may also damage infrastructure when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Descriptors

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second (in./sec.). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020c).

Response to Vibration

Vibration associated with construction of the project has the potential to be an annoyance to nearby land uses. Caltrans has developed limits for the assessment of vibrations from transportation and construction sources. The Caltrans vibration limits are reflective of standard practice for analyzing vibration impacts on structures. The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans 2020) identifies impact criteria for buildings and additional impact criteria for humans from transient and continuous/frequent sources: Table 14 presents the impact criteria for buildings, and Table 15 presents the impact criteria for humans.

Table 14 Vibration Damage Potential

Building Type	Maximum PPV (in./sec.)
Historic sites and other critical locations	0.1
Historic and some old buildings	0.5
Older residential structures	0.5
New residential structures	1.0
Modern industrial/commercial buildings	2.0
PPV = peak particle velocity; in./sec. = inches per second	
Source: Caltrans 2020	

Table 15 Vibration Annoyance Potential

Human Response	Maximum PPV (in./sec.)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Severe/Disturbing	2.00	0.70
Strongly perceptible	0.90	0.10
Distinctly perceptible	0.24	0.035
Barely perceptible	0.035	0.012

PPV: peak particle velocity; in./sec.: inches per second

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls (i.e., a loose steel ball that is dropped onto structures or rock to reduce them to a manageable size). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans 2020c

Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020c). When a building is exposed to vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Generally, a sensitive receiver is identified as a location where human populations (especially children, senior citizens, and sick persons) are present, and where there is a reasonable expectation of continuous human exposure to noise. According to the Noise Element of the Laguna Beach General Plan (2005), noise-sensitive land uses include residences, schools, hospitals, retirement homes, and daycare centers.

Vibration-sensitive receivers, which are similar to noise-sensitive receivers, include residences and institutional uses, such as schools, churches, and hospitals. However, vibration-sensitive receivers also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels that may be well below those associated with human annoyance (e.g., recording studios or medical facilities with sensitive equipment).

The nearest sensitive receivers to the site are multi-family residences immediately to the north and single- and multi-family residences immediately to the south. There is also a multi-family condominium building located at 647 Sleepy Hollow Lane between two of the project parcels.

Project Noise Setting

The primary offsite noise sources in the project area are motor vehicles (e.g., automobiles, buses, and trucks), particularly along SR-1. Ambient noise levels would be expected to be highest during the daytime and rush hour unless congestion slows speeds substantially.

According to the community noise contour maps included in the Noise Element of the Laguna Beach General Plan (2005), land uses along SR-1 are exposed to noise levels in the range of 60 and 70 CNEL. Topography and intervening buildings or barriers would have an additional effect on the propagation of noise. However, the noise contours presented in the Noise Element are based on a flat model and do not include topographic effects. The purpose of the Noise Element contours is to provide a screening method where areas with high noise levels that may affect future land uses. These contours represent a reasonable worst-case estimate of noise exposure but are not necessarily representative of site-specific conditions (Laguna Beach 2005).

Regulatory Setting

State of California

California's Green Building Standards Code (CALGreen), Standard 5.507.4, requires that all non-residential buildings with property lines within sound levels regularly exceeding 65 dBA L_{eq} verify the interior noise levels within occupied nonresidential space do not exceed 50 dBA L_{eq} .

City of Laguna Beach Noise Element

The goals, policies, and implementation actions contained in the Noise Element of the Laguna Beach General Plan (2005) focus on establishing regulations and applying criteria for acceptable noise levels for different land uses in order to minimize the negative impacts of noise, especially at sensitive receiver locations. In support of these goals and policies, the Noise Element contains a land use and noise compatibility matrix (shown in Table 16) that identifies normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for various land uses to guide planning decisions. In addition, the Noise Element identifies an interior noise standard of 45 CNEL for hotel uses.

Table 16 Land Use and Noise Compatibility Matrix (CNEL)

Land Use	Normally Acceptable ¹	Conditionally Acceptable ²	Normally Unacceptable ³	Clearly Unacceptable ⁴
Single-Family, Duplex, Mobile Homes	50 – 60	60 – 70	70 – 75	75+
Multi-Family	50 – 65	65 – 70	70 – 75	75+
Motel, Hotel	50 – 65	65 – 70	70 – 80	80+
School, Library, Church, Hospital, Nursing Home	50 – 70	–	70 – 80	80+
Auditorium, Concert Hall, Amphitheater	–	50 – 70	–	70+
Sports Arena, Outdoor Spectator Sports	–	50 – 75	–	75+
Playground, Neighborhood Park	50 – 70	70 – 75	–	75+
Golf Course, Riding Stable, Water Recreation, Cemetery	50 – 75	–	75 – 80	80+
Office Building, Business Commercial, Professional	50 – 70	70 – 75	75+	–
Agriculture, Industrial, Manufacturing, Utilities	50 – 75	75 – 80	80+	–

¹ Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

² Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning would normally suffice.

³ Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

⁴ Clearly Unacceptable: New construction or development should generally not be undertaken.

Note: Noise levels are provided in CNEL.

Source: Laguna Beach 2005

City of Laguna Beach Municipal Code

Chapter 7.25, *Noise*, of the Laguna Beach Municipal Code (LBMC) establishes a series of regulations and standards to prevent excessive noise that may jeopardize the health, welfare or safety of the citizens or degrade their quality of life. Specifically, LBMC Section 7.25.040(A), Exterior Noise Standards, establishes exterior noise standards categorized by five noise zones in the City. As shown in Table 17, the noise standards for these zones differ between daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) hours.

Table 17 Exterior Noise Level Standards

Noise Zone	Land Use	Noise Level (L _{eq} , dBA ¹)	
		Daytime (7:00 a.m. to 10:00 p.m.)	Nighttime (10:00 p.m. to 7:00 a.m.)
I	Residential	60 dBA	50 dBA
II	Commercial	65 dBA	65 dBA
III	Mixed-Use - Residential	65 dBA	55 dBA
IV	Downtown Specific Plan	70 dBA	70 dBA
V	Manufacturing, Industrial	70 dBA	60 dBA

¹ A-weighted decibel (dBA) is defined as a decibel (dB) adjusted to be consistent with human response.

Source: LBMC Section 7.25.040

According to LBMC Section 7.25.040(B), it is unlawful for any person at any location within the City to create noise which causes the noise level when measured on any other property to: (1) exceed the noise standard for the applicable zone for any 15-minute period, or (2) a maximum instantaneous (single instance) noise level equal to the noise standard plus 20 dBA for any period of time.

As listed in LBMC Section 7.25.060, Loud and Disturbing Noise, any loud, excessive, impulsive or intrusive noise, disturbance or commotion, which disturbs the peace or quiet of any area or which causes discomfort or annoyance to any reasonable person of normal sensitivities in the area, is prohibited from any person or property owner. The types of loud, disturbing, excessive, impulsive or intrusive noise may include, but is not limited to, yelling, shouting, hooting, whistling, singing, playing a musical instrument, and emitting or transmitting any loud music or noise from any mechanical or electrical sound making or sound-amplifying device.

Furthermore, LBMC Section 7.25.080, Construction Activity Noise Regulations, prohibits the operation of any tool or equipment used for construction activities or any other related building activity between the hours of 6:00 p.m. and 7:30 a.m. on weekdays, whereas such construction activities are prohibited entirely on weekends and federal holidays.

LBMC Section 7.25.130, Heating, venting, pool/spa and air conditioning—Special Provisions, includes specific noise standards for regulating heating, venting and air conditions (HVAC), and pool/spa equipment in or adjacent to residential areas. According to Section 7.25.130(a), permits for HVAC, and pool/spa equipment in or adjacent to residential areas are issued only after the installation contractor signs an acknowledgment that the installation will meet the noise limits established in LBMC Section 7.25.040.

- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The proposed project involves interior remodeling of nine existing buildings on the project site, construction of a new building (“New Reef”) with 15 hotel rooms, a pool/lounge and a single level subsurface parking garage with car stacking parking equipment, landscape and exterior lighting updates throughout the project site, the demolition of two existing swimming pools at the Surf and Seas buildings, the addition of a porte cochère with below grade storage and office space at the existing Surf building, repaving and restriping of existing parking lots, roadway improvements to Sleepy Hollow Lane, and below grade kitchen expansion and the conversion of storage space to a conference room at the Villa Building. The immediate surrounding area, consisting of multi-family

residences and commercial uses, may be subject to both temporary construction noise and long-term operational noise. The primary on-site noise sources associated with operation of the proposed project would include noise from delivery trucks, trash hauling trucks, and outdoor light recreation such as conversation and pool use. The following discussions address construction and operational noise associated with the project.

Construction Noise

Construction activity would result in temporary increases in ambient noise in the project area on an intermittent basis and, as such, would expose surrounding noise-sensitive receivers to increased noise. The nearest sensitive receivers to the site are multi-family residences immediately to the north and single- and multi-family residences immediately to the south. There is also a multi-family condominium building located at 647 Sleepy Hollow Lane between two of the project parcels.

While the City does not have specific noise level criteria for assessing construction impacts, the FTA has developed guidance for determining whether construction of a project would result in a substantial temporary increase in noise levels. Based on FTA guidance, a significant impact would occur if construction noise exceeds a one-hour 90 dBA L_{eq} noise limit during the day and a one-hour 80 dBA L_{eq} noise limit during the night at the nearest residences (FTA 2018). For this analysis, the City has adopted the FTA thresholds for determining if noise levels from construction would result in a substantial temporary increase in noise levels at local sensitive receivers.

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise-sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some may have discontinuous high-impact noise levels. The maximum hourly L_{eq} of each phase is determined by combining the L_{eq} contributions from each piece of equipment used in that phase (FTA 2018). Project construction phases would include demolition, site preparation, grading, building construction, architectural coating, and paving of the project site. It is assumed that diesel engines would power all construction equipment. For assessment purposes, the loudest phases have been used for this assessment (i.e., demolition, grading, and building construction), and have been modeled under the conservative assumption that a dozer, an excavator, and a jackhammer would be operating simultaneously.

Construction equipment would be continuously moving across the site, coming near and then moving further away from individual receivers. Therefore, due to the dynamic nature of construction, maximum hourly noise levels are calculated at various distances from the center of on-site construction activity to the nearest receivers. Using the FHWA RCNM, construction noise was modeled at 50 feet from adjacent residences. For a conservative analysis, construction noise modeling does not account for noise reduction from existing noise barriers (e.g., masonry walls). Construction noise levels and distances to the nearest receivers are shown in Table 18. RCNM calculations are included in Appendix H.

Table 18 Construction Noise Levels at Receivers

Construction Equipment	Approximate L_{eq} , dBA
	50 Feet
Bulldozer, Excavator, Jackhammer	84

L_{eq} : one-hour equivalent noise; dBA: A-weighted decibel
See Appendix H for RCNM results.

As shown in Table 18, maximum hourly noise levels during construction were calculated at 84 dBA L_{eq} at the nearest noise-sensitive receivers, consisting of adjacent single- and multi-family residences and the condominium building at 647 Sleepy Hollow Lane. Therefore, construction noise levels would not exceed the daytime noise criterion of 90 dBA L_{eq} (FTA 2018). Furthermore, per LPMC Section 7.25.080, construction activities are prohibited between the hours of 6:00 p.m. and 7:30 a.m. on weekdays, and entirely prohibited on weekends and federal holidays. As construction activities would not occur during these hours, construction noise levels would not exceed the nighttime noise criterion of 80 dBA L_{eq} (FTA 2018). Construction noise levels would not exceed applicable standards at nearby residences, and impacts would be less than significant.

Land Use Compatibility

The most predominant source of noise on and around the project site is vehicular traffic on SR-1. According to the City's noise compatibility matrix shown in Table 16, ambient noise levels up to 65 CNEL are normally acceptable for hotel uses while ambient noise levels up to 70 CNEL are conditionally acceptable for hotel uses. Based on Caltrans' AADT traffic volumes for SR-1 and Traffic Noise Prediction Model (Appendix H) calculations for the Existing plus Project traffic volume scenario, the project's northern façade facing SR-1 would be exposed to an ambient noise level of approximately 70 CNEL. According to the City's noise compatibility matrix, the project would be exposed to noise levels within the "conditionally acceptable" range, which means that new construction or development should be undertaken only after needed noise insulation features are included in the design (Laguna Beach 2005).

Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (FHWA 2011). Structures can substantially reduce occupants' exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows (FHWA 2011). Modern nonresidential buildings are typically constructed with storm windows, single- or double-glazed, which provide an exterior-to-interior noise level reduction of at least 20 dBA. Based on a noise exposure level of up to 70 CNEL and a noise attenuation of at least 20 dBA, the interior noise level within northern habitable rooms facing SR-1 would be up to 50 CNEL. Therefore, interior noise levels for northern hotel units with direct line-of-sight to SR-1 could exceed the City's interior noise standard of 45 CNEL for hotel uses.

CALGreen, Standard 5.507.4, also requires verification that interior noise levels within occupied nonresidential space of all non-residential buildings with property lines where sound levels regularly exceed 65 dBA L_{eq} do not exceed 50 dBA L_{eq} . Based on Caltrans' peak hour traffic volumes for SR-1 and Traffic Noise Prediction Model (Appendix A) calculations for the Existing plus Project traffic volume scenario, the project's northern façade facing SR-1 would be exposed to an ambient noise level of approximately 69 dBA L_{eq} . Therefore, northern hotel development would be exposed to noise

levels that exceed 65 dBA L_{eq} and would require noise insulation features to reduce interior noise levels to below 50 dBA L_{eq} . However, as noted previously, typical construction materials of modern buildings (e.g., storm windows, single- or double-glazed) provide an exterior-to-interior noise level reduction of at least 20 dBA. Based on modeled noise level of 69 dBA L_{eq} and a noise attenuation of at least 20 dBA, the interior noise level at non-residential areas of hotel development would not exceed the State's interior noise standard of 50 dBA L_{eq} .

Nonetheless, Mitigation Measure NOI-1 is recommended for northern hotel units with direct line-of-sight to SR-1 to comply with the City's interior noise standard of 45 CNEL for hotel uses. If implemented, the sound insulation technique described in Mitigation Measure NOI-1 would reduce exterior noise levels such that the project's interior noise levels in the habitable hotel rooms do not exceed 45 CNEL.

On-Site Operational Noise

Heating, Ventilation, and Air Conditioning (HVAC) Equipment

Noise from rooftop-mounted HVAC equipment typically generates noise in the range of 60 to 70 dBA L_{eq} at a reference distance of 15 feet from the source (Illingworth & Rodkin, Inc. 2009). HVAC equipment serving new hotel development could be located near existing sensitive receivers, consisting of adjacent single- and multi-family residences and the condominium building at 647 Sleepy Hollow Lane between project parcels. According to the City's exterior noise standards for a residential zone, noise levels from onsite HVAC equipment shall not exceed the respective daytime or nighttime noise level standards of 60 dBA L_{eq} and 50 dBA L_{eq} for any 15-minute period as regulated by LBMC Section 7.25.040(B). Based on building heights of remodeled hotel buildings, HVAC equipment could be located as close as 35 feet from existing sensitive receivers. Based on a noise level range of 60 to 70 dBA L_{eq} at 15 feet and an attenuation rate of approximately 6 dBA per doubling of distance from the source, HVAC equipment would generate estimated noise levels up to 66 dBA L_{eq} at 35 feet. On-site HVAC equipment could exceed the City's daytime noise level standard of 60 dBA L_{eq} and nighttime noise level standard of 50 dBA L_{eq} . Therefore, Mitigation Measure NOI-2 is recommended to reduce HVAC noise levels at adjacent off-site residences to less than 50 dBA L_{eq} .

Delivery- and Trash-hauling Trucks

The project would require periodic delivery and trash hauling services, which generate noise from medium-duty truck operations and idling engines. However, noise associated with delivery and trash-hauling trucks would be an intermittent noise source and are already a common occurrence in the project vicinity due to existing hotel, residential, and commercial uses that make up the developed urban area. Because delivery and trash trucks are already a common occurrence throughout the City, such services would not result in a substantial permanent increase in ambient noise levels without the project. Operational noise impacts associated with delivery and trash-hauling trucks would be less than significant.

Outdoor Noise

Operational noise associated with outdoor use areas (i.e., balconies and pool) at hotel development would include conversations, music, television, or other sound-generating equipment. These noise-generating activities would be comparable to those of existing on-site hotel uses and residences in the project vicinity and would result in a negligible change to existing noise levels. Noise from human conversation among a few people generates a noise level of approximately 55 dBA L_{eq} at three feet

from the source (Los Angeles 2014). Based on project plans, off-site residential properties would be setback from project parcels by at least 10 feet. Based on a reference noise level of 55 dBA L_{eq} at three feet and an attenuation rate of approximately 6 dBA per doubling of distance from the source, noise levels from outdoor use areas would be approximately 45 dBA L_{eq} at 10 feet. Therefore, noise levels from outdoor use areas would not exceed the respective daytime or nighttime noise level standards of 60 dBA L_{eq} and 50 dBA L_{eq} for any 15-minute period as regulated by LBMC Section 7.25.040(B). Moreover, noise from conversation would be an intermittent and temporary noise source that would typically be limited to the daytime, where there is greater activity and this type of noise source is more acceptable. Furthermore, according to LBMC Section 7.25.060, any loud, excessive, impulsive or intrusive noise, disturbance or commotion, which disturbs the peace or quiet of any area or which causes discomfort or annoyance to any reasonable person of normal sensitivities in the area, is prohibited from any person or property owner. The types of loud, disturbing, excessive, impulsive or intrusive noise may include, but is not limited to, yelling, shouting, hooting, whistling, singing, playing a musical instrument, and emitting or transmitting any loud music or noise from any mechanical or electrical sound making or sound-amplifying device. Operational noise impacts associated with light recreation would be less than significant.

Off-Site Traffic Noise

Hotel development facilitated by the project would generate new vehicle trips, thereby contributing to traffic on area roadways. The Trip Generation and Access Analysis for the proposed project determined that the hotel remodel would add 245 daily trips to area roadways (LSA 2019). According to Caltrans traffic counts on SR-1, the primary roadway by which the site is accessed, the annual average daily trip (AADT) volume in the project vicinity is approximately 40,000 vehicles (Caltrans 2018). With the proposed project, AADT on this segment of SR-1 would be an estimated 40,245 vehicles, or an increase of approximately 0.6 percent. Therefore, the project would generate an increase in traffic noise of less than 1 CNEL.⁶ The project would not create a perceptible 3-dBA increase in traffic noise and traffic noise impacts would be less than significant.

Mitigation Measures

NOI-1 Exterior-to-Interior Sound Insulation

For northern hotel units with direct line-of-sight to SR-1, the project applicant shall coordinate with project architects and other contractors to incorporate design measures for windows, walls, doors, and any other openings in the building shell that could reduce noise levels to the applicable limit. An acoustical analysis shall be performed prior to the issuance of an occupancy permit to demonstrate that noise levels do not exceed the interior noise standard of 45 CNEL in any habitable room as set forth by the City. Possible noise reduction techniques include:

- Exterior doors (including sliding glass doors) and windows would be installed such that there are no air gaps or perforations.
- Exterior doors and windows would be mounted in low air infiltration rate frames (0.5 cubic feet per minute or less, per ANSI specifications).

⁶ A doubling of traffic is required for an audible 3 dB increase in traffic noise levels. However, the increase in traffic generated by the proposed project would be approximately 0.6 percent of the estimated AADT on SR-1.

- Exterior doors would have a solid core with perimeter weather-stripping and threshold seals with a Sound Transmission Class (STC) rating of at least 31, with a potential for STC rating of 36 or higher if necessary.
- Exterior walls would include minimum of 5/8-inch of stucco or brick veneer over a minimum 1/2-inch plywood or OSB shear panel, R11 insulation and interior 5/8-inch gypsum board.
- Exterior walls would have a STC rating of at least 46.
- Dual-paned windows would be installed with a STC rating of at least 31, with the potential for STC rating of 36 or higher if necessary.
- If exterior sliding glass doors are included, high-performance glazing would be installed with a minimum STC rating of 36.
- Air conditioning or mechanical ventilation systems would be installed to allow windows and doors to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained. The mechanical ventilation system would meet the criteria of the International Building Code (Chapter 12, Section 1203.3 of the 2001 California Building Code) and the provisions of LBMC Section 7.25.130.

NOI-2 HVAC Equipment Noise Abatement

The project applicant shall comply with the LBMC Sections 7.25.040(B) and 7.25.130, including the strictest noise level standard of 50 dBA L_{eq} during nighttime hours, through measures such as, but not limited to:

- Siting all new on-site HVAC equipment out of direct line-of-sight from residential receivers.
- Use of mechanical rooms/enclosures (e.g., fencing with insulation, internal sound compression blanket, shock absorption base) or parapets (applicable to rooftop-mounted equipment) that block line-of-sight to receivers so that noise levels comply with LBMC Sections 7.25.0140(B) and 7.25.130. Sound attenuation techniques should be used and maintained in accordance with the manufacturer's specifications for the life of the equipment.

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b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Operation of the proposed project would not include stationary sources of significant vibration, such as heavy equipment operations or press operations. Rather, construction activities have the greatest potential to generate groundborne vibration affecting nearby receivers. Certain types of construction equipment can generate high levels of groundborne vibration. Construction of the proposed project would potentially utilize loaded trucks, jackhammers, and/or bulldozers during most construction phases and during the demolition phase.

The City has not adopted specific standards for vibration impacts during construction. Therefore, the Caltrans Transportation and Construction Vibration Guidance Manual (2020) is used to evaluate potential construction vibration impacts related to both potential building damage and human annoyance. Based on the Caltrans criteria shown in Table 14 and Table 15, construction vibration impacts would be significant if vibration levels exceed 0.5 in./sec. PPV for residential structures and 2.0 in./sec. PPV for industrial and commercial structures, which is the limit where minor cosmetic, i.e., non-structural, damage may occur to these buildings. In addition, construction vibration impacts would cause human annoyance at nearby receivers if vibration levels exceed 0.24 in./sec. PPV, which is the limit above which temporary vibration activities become distinctly perceptible.

Because groundborne vibration could cause physical damage to structures, vibration impacts were modeled based on the distance from the location of vibration-intensive construction activities, conservatively assumed to be at edge of the project site, to the edge of nearby off-site structures. Therefore, the groundborne vibration analysis differs from the construction noise analysis in that modeled distances for vibration impacts are those distances between the project site to nearest off-site structures (regardless of sensitivity) whereas modeled distances for construction noise impacts are those distances between the center of on-site construction activity and the property line of the nearest off-site sensitive receivers. Based on the distance of nearby structures to the project site, vibration levels were modeled at 25 feet from adjacent single- and multi-family residences (including the condominium building located at 647 Sleepy Hollow Lane between two project parcels) and commercial development. Table 19 shows estimated groundborne vibration levels from project equipment. Vibration calculations are included in Appendix H.

Table 19 Vibration Levels at Receivers

Equipment	in./sec. PPV	
	Single- and Multi-Family Residences 25 Feet	Commercial Development 25 Feet
Large Bulldozer	0.089	0.089
Loaded Truck	0.076	0.076
Jack hammer	0.035	0.035
Small Bulldozer	0.003	0.003
Threshold for Building Damage	0.50	2.0
Threshold for Human Annoyance	0.24	0.24
Thresholds Exceeded?	No	No
PPV: peak particle velocity; in./sec.: inches per second		
See Appendix H for vibration analysis worksheets.		

As shown in Table 19, construction activities would generate peak vibration levels of approximately 0.09 in./sec. PPV at the nearest single- and multi-family residences and commercial development. Therefore, according to the Caltrans vibration criteria, groundborne vibration from typical construction equipment would not exceed the applicable threshold of 0.5 in./sec. PPV for building damage at adjacent residences surrounding the project site, nor would it exceed the applicable threshold of 2.0 in./sec. PPV for building damage at adjacent commercial development. Furthermore, groundborne vibration would not exceed the threshold of 0.24 in./sec. PPV for human annoyance. Project construction would not result in groundborne vibration that would cause building damage or human annoyance. Vibration impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

As discussed in Section 9, *Hazards and Hazardous Materials*, the project site is not located within two miles of a public airport or within an airport land use plan (Orange County Airport Land Use Commission 2008). The airport nearest to the project site is the John Wayne Airport, located approximately 10 miles northeast of the project site. Furthermore, there are no private airstrips in the vicinity of the project site. Therefore, the project would not expose people working in the project area to excessive noise levels. No impact would occur.

NO IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The proposed project would not include housing and, therefore, would not directly contribute to population growth within the City. Furthermore, according to the project applicant, the proposed project would not generate increased employment at the project site, as the number of employees at the hotel and restaurants would not be altered. Therefore, the project would not cause a substantial direct or indirect increase in population or induce unplanned population growth. There would be no impact.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

Because no existing housing is located on the project site, the proposed project would not displace existing housing or people and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

NO IMPACT

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15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1 Fire protection?	☐	☐	☒	☐
2 Police protection?	☐	☐	☒	☐
3 Schools?	☐	☐	☐	☒
4 Parks?	☐	☐	☒	☐
5 Other public facilities?	☐	☐	☒	☐

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Fire protection is provided by the Laguna Beach Fire Department (LBFD). The nearest fire station to the project site is LBFD Station No. 1 located at 501 Forest Avenue, approximately 0.5 mile (driving distance) north of the project site. The proposed project would involve the renovation of existing hotel buildings and amenities, the construction of a new hotel building, and infrastructure improvements along Sleepy Hollow Lane. As identified in Chapter 15.01 of the LBMC, the City of Laguna Beach has adopted the California Fire Code (2019 edition). The Fire Code contains regulations related to construction, maintenance and design of buildings and land uses. The project would be required to adhere to all Fire Code requirements.

Furthermore, as discussed in Section 14, *Population and Housing*, the project would not significantly increase the population of the City, as it does not include new housing or employment opportunities. Therefore, the proposed project would not substantially affect community fire protection services and would not result in the need for construction of additional fire protection facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

Police protection services in Laguna Beach are provided by the Laguna Beach Police Department (LBPD). LBPD consists of approximately 52 sworn police officers and total staffing of approximately 96 fulltime employees (Laguna Beach 2020b). Based on a current total population of 22,343, the current officer to population ratio is 2.3 sworn officers per 1,000 residents (DOF 2020). The Field Services Division patrols the City in three geographic areas; the project site is within Patrol Beat Two (LBPD 2017). The project site is served by the LBPD Station located at 505 Forest Avenue, approximately 0.5 mile (driving distance) north of the project site. As discussed in Section 14, *Population and Housing*, the project would not result in increased population or employment in the City, and therefore would not cause substantially delayed response times, degraded service ratios or necessitate construction of new facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

Facilities serving grade levels pre-K through high school (LBUSD 2020). The project would not involve new residential development and is not anticipated to result in additional students in the school district. Therefore, the project would not result in the need for new or physically altered school facilities and there would be no impact.

LESS THAN SIGNIFICANT IMPACT

- a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

Recreational amenities in the City of Laguna Beach are managed by the Community Services Department. Recreational amenities in the City include 14.7 acres of oceanfront parks and seven small parks throughout the City (Laguna Beach 2006 and 2020c). Though the City does not meet the desired standard of three acres of parkland per 1,000 residents as stated in the 1975 Quimby Act, residents and workers in the City can easily access recreational amenities in the areas adjacent to Laguna Beach, such as the Laguna Greenbelt, which is an approximately 10,000 acre open space area within unincorporated Orange County (Laguna Beach 2006). The project would not contribute to population growth that would result in adverse physical impacts to parks or require the provision of new parks. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The project would contribute incrementally toward impacts to City public services and facilities such as storm drain usage (discussed in Section 10, *Hydrology and Water Quality*), public parks, solid waste disposal (discussed in Section 19, *Utilities and Service Systems*), and water usage and wastewater disposal (discussed in more detail in Section 19, *Utilities and Service Systems*). The project's contribution would be offset through project specific features described in the individual resource section analyses indicated in parenthesis above. As the project is not anticipated to cause substantial population growth within the City, there are no other public services or public facilities, such as libraries or hospitals, for which significant impacts are anticipated. Overall, impacts to other public facilities would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

As discussed under Section 15, *Public Services*, recreational amenities in the City of Laguna Beach include 14.7 acres of oceanfront parks and seven small parks throughout the City (Laguna Beach 2006 and 2020c). Though the City does not meet the desired standard of three acres of parkland per 1,000 residents as stated in the 1975 Quimby Act, residents and workers in the City can easily access recreational amenities in the areas adjacent to Laguna Beach, such as the Laguna Greenbelt, which is an approximately 10,000 acre open space area within unincorporated Orange County (Laguna Beach 2006).

As discussed above in Section 14, *Population and Housing*, and Section 15, *Public Services*, the project would not increase the number of residents or employees in the area. Because residents can easily access open space and recreational opportunities within the region and because the project does not increase the number of residents, the project would not create unanticipated demand on city parks or cause substantial deterioration of existing parks such that new park facilities would be needed. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

A Trip Generation and Access Analysis and Vehicle Miles Traveled Memorandum were completed for the proposed project (LSA 2020a and 2020b). The full Trip Generation and Access Analysis and Vehicle Miles Traveled Memorandum are available in Appendix I and Appendix J of this document, respectively. The below analysis is based on the results of these studies.

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Construction of the project would generate traffic for deliveries of equipment and materials to the project site and construction worker traffic. Construction-related vehicles would travel to, and access, the project site via SR-1. Construction vehicles and equipment would be staged in the existing parking lots of the hotel. Construction worker trips were estimated based on default values provided by the CalEEMod (see Appendix A). The project would generate a maximum of 26 construction worker trips per day. The latest traffic counts on SR-1 indicate that the annual average daily traffic on SR-1 in the vicinity of the project site is approximately 40,000 (Caltrans 2018). As the increase in average daily traffic would be less than one percent of the annual average daily traffic on SR-1, project construction is not anticipated to affect the performance of the circulation system. In addition, construction traffic would be temporary, and the movement of construction equipment would be limited to the project site for most of the construction period and vehicular access to SR-1 would be maintained throughout the construction period. Therefore, construction traffic would not substantially interfere with the City's circulation system.

The proposed changes to the project site include the addition of 25 new hotel rooms (15 new rooms in the New Reef Building, six new rooms in the existing Bahia Building, and four new rooms in the existing Seas Building), 14 restaurant seats, new amenities for hotel guests, and a new café with public

seating. These additions would generate an estimated 245 trips per day during operation (LSA 2020a). According to the Trip Generation and Access Analysis, the proposed project would not alter the existing Level of Service (LOS) at the intersections of SR-1/Sleepy Hollow Lane and SR-1/Cleo Street (LSA 2020a). According to the City's established thresholds of significance, at a signalized intersection (such as SR-1/Cleo Street), a significant impact would occur if the project adds six seconds or more to the delay of an intersection operating at satisfactory LOS or two seconds or more to the delay of an intersection operating at unsatisfactory LOS. At a one-way stop-controlled intersection (such as SR-1/Sleepy Hollow Lane), a significant impact would occur if the intersection is operating at an unsatisfactory LOS and the project would increase delay by four seconds or more.

The project would not increase average vehicle delay during the AM peak hour at either intersection. The project would increase average vehicle delay at the signalized intersection of SR 1/Cleo Street by 0.1 seconds during the PM peak hour. Delay at the stop-controlled approach of SR-1/Sleepy Hollow Lane would be anticipated to increase by up to 1.8 seconds per vehicle during the PM peak hour. The added delay would be less than the established threshold and the impacts to either intersection would be less than significant. Furthermore, the proposed project would not impact existing pedestrian facilities in the vicinity of the project site, such as the sidewalks along SR 1, or public transit stops along SR-1, such as the Laguna Beach Trolley bus stop near the intersection of SR-1/Cleo Street. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)??*

CEQA Guidelines Section 15064.3(b) identifies appropriate criteria for evaluating transportation impacts. It states that land use projects with vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact, and that projects that decrease VMT compared to existing conditions should be presumed to have a less than significant transportation impact. Section 15064.3(c) states that the requirement to use these criteria only applies on and after July 1, 2020. A deadline of July 1, 2020 was established for jurisdictions to adopt thresholds for evaluation of transportation impacts according to VMT. The City did not prepare revised traffic impact guidelines or separate VMT analysis guidelines by the July 1, 2020, deadline. However, CEQA Guidelines Section 15064.7(c) states the following:

When adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency is supported by substantial evidence.

While the City has not adopted specific VMT thresholds, the County of Orange (County) is in the process of adopting the August 7, 2020, *County of Orange Guidelines for Evaluating Vehicle Miles Traveled under CEQA* (County Guidelines). The County Guidelines establish screening criteria for land use projects that would not exceed an applicable threshold of significance. One of the screening criteria is for small projects (LSA 2020b).

The County Guidelines establish a screening criterion of 500 average daily trips based on the substantial evidence that this traffic volume correlates to greenhouse gas emissions below the typical emissions threshold of 3,000 MT CO₂e equivalent. The proposed project would result in a net increase of 245 daily trips (LSA 2020a). Because the proposed project's trip generation is below the Orange County screening level threshold, an applicable threshold of significance, the proposed project would

not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

No roads would be permanently closed as a result of construction or operation of the project. Upon implementation of the proposed changes, the project site would be accessible by driveways off of Sleepy Hollow Lane. The existing hotel lobby off of SR-1 would be moved, and the driveway off of SR-1 would be removed in accordance with Caltrans standards. This would reduce traffic delays on SR-1 by eliminating vehicle queues waiting to turn left into the project site and reduce valet traffic at the intersections of SR-1/Sleepy Hollow Lane and SR-1/Cleo Street (LSA 2020a). Therefore, project would not result in inadequate emergency access or introduce any design features or incompatible uses, such as sharp curves or dangerous intersections, that would substantially increase hazards at the site. Additionally, no line of site impacts are anticipated, and no impact would occur.

NO IMPACT

- d. *Would the project result in inadequate emergency access?*

The project would not result in inadequate emergency access because it would be subject to Building Safety Division and LBFD review for acceptance of site plans prior to occupancy to confirm that required safety features, including adequate emergency access, are implemented. The project site and parking areas would be accessible by driveways off of Sleepy Hollow Lane, and access would be maintained throughout the construction and operation of the proposed project. Consequently, there would be no impact.

NO IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is

traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)?*

As discussed in Section 3, *Cultural Resources*, the project site is currently developed with commercial uses and is surrounded by residential and commercial uses. The developed site has been disturbed, has been previously graded, and is almost entirely paved. Due to this previous ground disturbance, there is low probability of encountering on-site tribal cultural resources throughout project construction.

A Local Government Tribal Consultation List Request was sent to the Native American Heritage Commission (NAHC) to obtain a list of Native American tribes with jurisdiction in the project area. On May 5, 2020, the NAHC responded to the City’s request with a consultation list of nine tribes to contact for their traditional and cultural affiliation with the geographic area in which the project is located. Based on this list, and per PRC Section 21080.3.1., the City sent out consultation letters to these nine listed tribes and have since received a response from the Juaneño Band of Mission Indians, Acjachemen Nation with feedback regarding the proposed project. The tribal representative stated concern about ground disturbance associated with construction of the project due to the traditional and cultural affiliation of the Tribe with the geographical area in which the project lies and suggested mitigation measures for the construction process. Materials related to this consultation process are included in Appendix K of this document.

Given the developed nature of the site, excavation and grading activities required for project construction are not expected to uncover tribal cultural resources. However, it is possible that intact and previously undiscovered tribal cultural resources are present at subsurface levels and could be uncovered during ground-disturbing activities. Mitigation Measure CR-1, discussed in Section 5, *Cultural Resources*, requires Tribal and archeological monitoring during initial ground disturbing activities. In the event that previously unknown tribal cultural resources are found, significant effects may occur to that resource if the resource is disturbed, destroyed, or otherwise improperly treated. As such, Mitigation Measure TCR-1 is required in the event such tribal cultural resources are uncovered during construction.

TCR-1 Unanticipated Discovery of Tribal Cultural Resources

In the event that a cultural resource of Native American origin is found during project-related ground disturbance, excavation and other construction activity in that area shall cease. If the City of Laguna Beach, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The mitigation plan may include but would not be limited to avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon means.

Implementation of Mitigation Measure CR-1 and TCR-1 would reduce potential impacts to tribal cultural resources to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1?*

There are no known tribal cultural resources at the project site. However, as described under *Impact a.* of this section, the potential for previously undiscovered tribal cultural resources to be uncovered during ground-disturbing activities, while unlikely, cannot be completely ruled out. If such resources are found and are determined to be significant under PRC Section 5024.1, the project could result in significant impacts to such resources if they are disturbed, destroyed, or otherwise improperly treated. Mitigation Measures CR-1 and TCR-1 would ensure that any subterranean tribal cultural resources encountered during construction activities for the proposed project are properly handled and treated. With implementation of Mitigation Measures CR-1 and TCR-1, impacts to tribal cultural resources would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Water

The project site is served by LBCWD, which sources approximately half of its water from imported water provided by MWD and half from groundwater pumped from the Santa Ana Basin (LBCWD 2019). LBCWD's 2015 Urban Water Management Plan (UWMP) reports total districtwide potable water demand in 2015 at 3,630 acre-feet (AF). According to the UWMP, LBCWD expects to meet

projected demands and anticipates having an annual supply surplus of between 2,274 AF and 3,546 AF through 2040 (LBCWD 2016). The project would demand an estimated 0.28 million gallons (0.87 AF) of water per year according to CalEEMod estimates (see Appendix A). Project water demand would represent approximately 0.02 to 0.04 percent of the projected annual water supply surplus through 2040 (LBCWD 2016). Therefore, the project's projected water demand is within forecasted water supply and would not require the construction of new water supply facilities, or expansion of existing facilities. Impacts would be less than significant.

Wastewater

The City operates a sanitary sewer system that consists of 85.71 miles of gravity sewers, 9.44 miles of force mains, and 25 lift stations (Laguna Beach 2020d). The City is also a member agency of SOCWA, which operates the Coastal Treatment Plant (CTP) in Laguna Beach that provides anaerobic digestion for wastewater. The City's wastewater is delivered to the CTP, which has a permitted capacity of 6.70 million gallons of wastewater per day (MGD). Of the 6.7 MGD, the City has capacity ownership over 2.54 MGD (SOCWA 2019).

The project would create demand for an estimated 0.28 million gallons of water per year according to CalEEMod estimates (see Appendix A). Conservatively assuming that 100 percent of this water use would be treated as wastewater, 0.28 million gallons per year (767.1 gallons per day or 0.0008 million gallons per day [MGD]) represents less than 0.01 percent of the remaining daily capacity of 3.58 MGD of wastewater at the CTP. Therefore, the project would not require the construction of new treatment facilities because the CTP would have adequate capacity to treat the wastewater produced by the project. Impacts would be less than significant.

Stormwater Drainage

As discussed in Section 10, *Hydrology and Water Quality*, the project would comply with Title 22 of the LBMC, Excavating, Grading and Filling, which establishes requirements for construction. LBMC Chapter 22.06, Design Standards, and Chapter 22.17, Construction Project Erosion and Sediment Control Maintenance Requirements, require implementation of standard construction BMPs to avoid or minimize temporary adverse effects such as erosion and siltation and provide design standards for site drainage including the preservation of natural hydrological features.

In addition, the project would comply with LBMC Chapter 16.01, Water Quality Control, which requires project plan and BMP review prior to the issuance of construction permits to ensure that the project, once constructed, would not adversely impact water quality. Furthermore, the proposed project would not substantially alter existing drainage on the site as the site is almost entirely paved and the project would not increase the amount of hardscaping present. Therefore, the project would not create or contribute runoff water such that new or expanded stormwater drainage systems would be necessary, and impacts would be less than significant.

Electric Power, Natural Gas, Telecommunications

The project would not cause substantial unplanned population growth (see Section 14, *Population and Housing*), and would not result in wasteful or inefficient use of energy (see Section 6, *Energy*). Nor would the project require or result in the construction of new electric power, natural gas, or telecommunication facilities or expansion of existing facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

LBCWD provides domestic water to the project site. LBWDC sources approximately half of its water from imported water provided by MWD and half from groundwater pumped from the Santa Ana Basin (LBCWD 2019). LBCWD's 2015 UWMP identifies anticipated water supplies and demands for the years 2020 through 2040. The UWMP states that, with its existing and planned supplies, LBCWD can provide reliable water supplies for an average year, single dry year, and multiple dry years. In fact, LBCWD expects to have an annual supply surplus of between 2,274 AF and 3,546 AF through 2040 (LBCWD 2016). Table 20 shows projected water supply and demand in the District through 2040 according to the 2015 UWMP.

Table 20 Projected Water Supply and Demand

Year-Type	2020	2025	2030	2035	2040
Normal Year					
Total Supplies	6,093	7,093	7,093	7,093	7,093
Total Demands	3,304	3,589	3,601	3,558	3,547
Surplus	2,789	3,504	3,492	3,535	3,546
Single Dry Year					
Total Supplies	6,093	7,093	7,093	7,093	7,093
Total Demands	3,819	4,149	4,163	4,114	4,101
Surplus	2,274	2,944	2,930	3,979	2,992
Multiple Dry Year 1st, 2nd, and 3rd Year					
Total Supplies	6,093	7,093	7,093	7,093	7,093
Total Demands	3,304-3,648	3,589-3,963	3,601-3,976	3,558-3,929	3,547-3,916
Surplus	2,445-2,789	3,130-3,504	3,117-3,492	3,164-3,535	3,177-3,546

Units in acre-feet (AF)
Source: LBCWD 2016

According to CalEEMod results, the project would demand an estimated 0.87 AF of water per year. This increase is within the forecasted increase in water demand for LBCWD shown in Table 20. Impacts related to water supply would therefore be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

As discussed under *Impact a.* of this section, the local wastewater collection system is owned by the City of Laguna Beach and is managed, operated, and maintained by the City's Public Works Department. The City operates a sanitary sewer system that consists of 85.71 miles of gravity sewers, 9.44 miles of force mains, and 25 lift stations (Laguna Beach 2020d). The City is also a member agency of SOCWA, which operates the Coastal Treatment Plant (CTP) in Laguna Beach that provides anaerobic digestion for wastewater. The City's wastewater is delivered to the CTP, which has a permitted capacity of 6.70 million gallons of wastewater per day (MGD). Of the 6.7 MGD, the City has capacity ownership over 2.54 MGD (SOCWA 2019).

CalEEMod is a statewide emissions computer model and comprehensive tool for quantifying emissions associated with both construction and operations from a variety of land use projects, including project water demand. Conservatively assuming that wastewater generation would be approximately 100 percent of water demand, the proposed project would generate approximately 0.28 million gallons per year (767.1 gallons per day or 0.0008 million gallons per day [MGD]) based on the CalEEMod modeling results (Appendix A). The project's estimated wastewater generation would account for less than 0.01 percent of the remaining daily capacity of 3.58 MGD of wastewater at the CTP. Therefore, the CTP has sufficient capacity to accommodate additional wastewater flows generated by the proposed project, the proposed project would not require the construction of new or expanded treatment facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Assembly Bill 341 (AB 341) set a statewide goal for a 75 percent reduction in waste disposal by the year 2020 and established mandatory recycling for commercial businesses. The City is required to comply with this law and report their progress towards achieving the 75 percent reduction goal to the Department of Resources Recycling and Recovery (CalRecycle). The City's Public Works Department supplies residents, businesses, and institutions with waste carts for recyclables and green waste through their contract with the private waste hauler, Waste Management. Waste generated from the project site would be taken to Sunset Environmental Transfer Station, where recyclables are separated from the solid waste. Materials leaving transfer stations could be transported to three active landfills within Orange County: Olinda Alpha Landfill, Frank R. Bowerman Landfill, and Prima Deshecha Landfill (Orange County 2020). These landfills are permitted to receive between 4,000 and 11,500 tons of waste per day and have remaining capacities between 34,200,000 and 205,000,000 cubic yards (CalRecycle 2020a, 2020b, 2020c).

Construction of the proposed project would generate solid waste, including construction debris. This construction debris would include wood, concrete, and plaster material from the existing commercial buildings on the site. Construction debris would be removed and disposed of in a timely manner and in accordance with all applicable laws and regulations. According to the project applicant, construction waste would be hauled to either the Camp Pendleton Recycling Facility or the Olinda Alpha Landfill. The removal of demolished building materials and construction debris would only

occur during the construction period and construction of the proposed project would not contribute to an exceedance of the permitted capacity of any local landfill.

According to the CalEEMod results (Appendix A), operation of the proposed project would generate 8.2 tons of solid waste per year or 0.02 tons per day. Assuming a 50 percent diversion rate per AB 939, an estimated 4.1 tons per year or 0.01 tons per day would go to a serving landfill. This would represent less than 0.001 percent of the daily permitted capacities of the three Orange County landfills, all of which have sufficient remaining capacity to serve the proposed project's estimated waste generation. In addition, the proposed project would comply with federal, State, and local statutes and regulations related to solid waste, such as AB 939 and the City's recycling programs for residences. Therefore, impacts would be less than significant.

NO IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The project site is in an urban area of the City of Laguna Beach and is not within a state responsibility area. Undeveloped wildland areas are not located near the project site. According to CalFIRE, the project site is not located in or near a Very High Fire Hazard Severity Zone (VHFHSZ) for wildland fires (CalFIRE 2011). The nearest VHFHSZ is located approximately 0.25 mile north of the project site and is separated from the project site by intervening urban development and roadways. Therefore, the project site is not located near a state responsibility area or classified as having a high fire hazard.

As discussed in Section 15, *Public Services*, the LBFD would provide fire prevention, fire protection, and emergency response for the proposed project. The Fire Department would review site plans, site construction, and the proposed new structure prior to occupancy to ensure that required fire protection safety features, including building sprinklers and emergency access, are implemented. In addition, the proposed project would comply with applicable policies and ordinances for fire

prevention, protection, and safety as required by the LBMC, which include development with modern materials and in accordance with current standards, inclusive of fire-resistant materials, and provision of fire alarms and detection systems, and automatic fire sprinklers. Construction of the proposed project would maintain emergency access to the site and on area roadways and would not interfere with an emergency response plan or evacuation route. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project site is located in an urban area of the City and is not adjacent to a wildland-urban interface. The project site is relatively flat, with elevations ranging from approximately 10 to 20 meters above mean sea level. There are no streams or rivers located on or adjacent to the project site, and the project site is not at high risk of downslope or downstream flooding or landslides. The project site is approximately 0.25 mile south of the nearest VHFHSZ, which is separated from the project site by urban development (CalFire 2011). Risks to occupants during project operation would be mitigated through conformance with LBMC Chapter 15.01, which adopts the 2019 California Fire Code and establishes provisions for fire safety related to construction, maintenance and design of buildings and land uses. In addition, Laguna Beach Fire Department Station No. 1 is located approximately 0.5 mile (driving distance) north of the project site.

Therefore, the project would not exacerbate wildfire risks, and risks to people or structures due to runoff, post-fire slope instability, or drainage changes. Visitors and employees of the project site would not be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant

LESS THAN SIGNIFICANT IMPACT

- c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The project site is in an urbanized area and is not located in or near a state responsibility area or land classified as a very high fire hazard severity zone (CalFire 2011). The project would be served by existing roads and utilities and would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk. Therefore, the project would not require additional roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk and no temporary or ongoing impacts to the environment would occur.

NO IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

As discussed in Section 4, *Biological Resources*, there are no mapped essential habitat connectivity areas in the immediate vicinity of the project site. In addition, regional wildlife movement is restricted given the built-out nature of the project area, and no native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or native wildlife nursery sites exist on or immediately around the project site. However, the site currently contains trees and buildings which may provide nesting habitat for birds. Therefore, Mitigation Measure BIO-1 would require a pre-construction nesting bird survey should construction occur during the breeding season to avoid

potential impacts to on-site nesting birds. Furthermore, as discussed in Section 5, *Cultural Resources*, Section 7, *Geology and Soils*, and Section 18, *Tribal Cultural Resources*, the proposed project would have a less than significant impact on unanticipated cultural resources, paleontological resources, and tribal cultural resources with implementation of Mitigation Measures CR-1, CR-2, GEO-1, and TCR-1, which require adherence to existing local, State and federal regulations and specific monitoring procedures related to the discovery of any unanticipated cultural resources, paleontological resources, tribal cultural resources, and human remains during construction activity. Therefore, the proposed project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

As concluded in Sections 1 through 20, the project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated with respect to all environmental issues considered in this document. Cumulative impacts of several resource areas have been addressed in the individual resource sections, including Air Quality, GHG Emissions and Noise. As discussed in Section 3, *Air Quality*, construction and operational air pollutant emissions from the project would not exceed SCAQMD thresholds. Likewise, GHG Emissions generated by the proposed project would not exceed the SCAQMD threshold and the project would not conflict with applicable sustainability plans established for the purpose of reducing GHG emissions. Because air quality and GHG emissions analyses are cumulative in nature, the project would not have a cumulatively considerable contribution to any cumulative air quality or GHG emissions impacts posed by other projects in the vicinity.

Section 13, *Noise*, concludes that operation of the project, including operational traffic and operation of the proposed fire station, would not result in a perceptible increase in ambient noise levels. Construction noise generated by the project would remain below the FTA daytime threshold for an 8-hour period at the nearest noise-sensitive receptors, located immediately north and south of the project site. Construction and operation of the project would not create noise that exceeds the City’s noise ordinance requirements for exterior or interior noise levels at the closest sensitive receivers.

As discussed in Section 17, *Transportation*, construction of the project would be limited to the project site and would not significantly impede traffic flow on SR-1. Additionally, the project would generate an estimated 245 trips per day, which would not result in any significant impacts to area roadways and circulation. Therefore, the project would not have a cumulatively considerable contribution to traffic impacts in the area.

Other resource areas, such as agricultural and mineral resources, were determined to have no impact in comparison to existing conditions. As such, the project would not contribute to cumulative impacts related to these issues. Other issues (e.g., geology, hazards, and hazardous materials) are by their nature project specific and impacts at one location do not add to impacts at other locations or create

additive impacts. As such, the project's contribution to cumulative impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in the preceding sections, the project would not result, either directly or indirectly, in substantial adverse effects related to air quality or noise. As discussed in Section 9, *Hazards and Hazardous Materials*, project operation would not involve the routine use of extremely hazardous materials. Any pool chemicals stored onsite would comply would be located in a locked enclosure that would contain any accidental leakages. Compliance with applicable rules and regulations during project construction and operation would reduce potential impacts on human beings related to hazardous materials, noise, and air quality to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

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Mitigation Monitoring and Reporting Program

1. Introduction to the MMRP

The California Environmental Quality Act (CEQA) requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code [PRC] 21081.6). PRC Section 21081.6 provides general guidelines for implementing mitigation monitoring programs and indicates that specific reporting and/or monitoring requirements, to be enforced during project implementation, shall be defined prior to final certification of the Final Initial Study-Mitigated Negative Declaration (IS-MND).

This mitigation monitoring and reporting program (MMRP) is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the IS-MND, specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

2. MMRP Matrix

Table 21, *Mitigation Monitoring and Reporting Program*, below, lists mitigation measures and project design features that reduce the potentially significant effects of the proposed project. These measures correspond to those discussed in in the IS-MND. To ensure that the mitigation measures are properly implemented, a monitoring program has been devised that identifies the timing and entity/agency responsible for monitoring each measure. The City of Laguna Beach will have the responsibility for implementing the measures, and various public agencies will have the primary responsibility for enforcing, monitoring, and reporting the implementation of the mitigation measures.

Table 21 Mitigation Monitoring and Reporting Program

Mitigation Measure/ Condition of Approval	Method of Verification	Responsibility/ Timing of Implementation	Enforcement Agency
Biological Resources			
BIO-1: Nesting Bird Avoidance			
To avoid disturbance of nesting and special-status birds, including raptorial species protected by the MBTA and CFGC, activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 31). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of construction activities. The nesting bird pre-construction survey shall be conducted on foot inside the project site, including a 100-foot buffer, and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer, as determined by the biologist, shall be demarcated by a qualified biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No parking, storage of materials, or construction activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.	Preconstruction survey results and written verification of appropriate buffers or mitigation measures if bird nests are identified in the survey.	Prior to issuance of grading permits. Within 14 days prior to commencing construction activities that would take place between February 1 and August 31, the Applicant will contract a qualified biologist with the City's approval to conduct a preconstruction nesting survey. Review record of protective measures upon notice of located active bird nests and verify that buffers and recommended measures to avoid nests are in place prior to commencing construction.	City of Laguna Beach
Cultural Resources			
CR-1: Archaeological and Native American Monitoring			
During initial ground disturbance for the project, a qualified archaeologist and locally affiliated Native American monitor shall monitor construction activities within the project site. Initial ground disturbance is defined as disturbance within previously undisturbed native soils. If, during initial ground disturbance, the qualified archaeologist determines that the construction activities have little or no potential to impact cultural resources (e.g., excavations are within previously disturbed, non-native soils, or within soil formation not expected to yield cultural resources deposits), the qualified archaeologist may recommend that monitoring be reduced or eliminated. If cultural resources are identified during initial monitoring, work in the immediate vicinity shall halt until the resource has been evaluated	Monitoring contract with qualified archaeologist and Native American monitor.	The City shall provide written evidence that a Qualified archaeologist and Native American monitor have been retained and ensure that this measure applies during initial ground disturbing phases of construction.	City of Laguna Beach

Mitigation Measure/ Condition of Approval	Method of Verification	Responsibility/ Timing of Implementation	Enforcement Agency
for significance. Should cultural resources be discovered during excavation, additional studies including data recovery efforts may be needed to reduce project impacts and/or consultation with local tribes and the City of Laguna Beach, acting as lead agency, may be necessary to mitigate any significant impacts.			
CR-2: Unanticipated Discovery of Archaeological Resources			
If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately by the construction manager to evaluate the find in consultation with the City's Planning Manager. The Planning Manager shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are determined to be prehistoric or Native American in origin. Work shall not resume until authorized by the City and the qualified archaeologist.	Written verification of compliance with procedures for treatment of discovered archaeological resources.	The City shall provide written evidence that a Qualified archaeologist has been retained and ensure that this measure applies during ground disturbing phases of construction.	City of Laguna Beach
Geology and Soils			
GEO-1: Paleontological Resources Monitoring			
Prior to the commencement of project construction, a qualified paleontological monitor (i.e., a paleontologist who meets the SVP [2010] standards as a Paleontological Resource Monitor) shall be retained to conduct paleontological monitoring during ground-disturbing activities (including, but not limited to site preparation, grading, excavation, and trenching) of intact (i.e., previously undisturbed) Qop2-6 and Tt geologic units, located on the northern and eastern portions of the project site (Figure X and XX) What figure numbers?. Monitoring shall be supervised by a Qualified Paleontologist (i.e., a paleontologist who meets the SVP [2010] standards as a Qualified Professional Paleontologist). Full-time monitoring shall be conducted for all ground-disturbing activities associated with excavations for the subterranean garage, and all ground disturbance within project areas underlain by geologic units with high paleontological sensitivity (i.e., inland of Sleepy Hollow Lane). These project activities have a high potential of disturbing impact native, previously undisturbed geologic units including Quaternary old (late to middle Pleistocene) paralic deposits, Units 2-6 (Qop2-6) and Miocene Topanga Group (Tt), which have a high paleontological sensitivity. If Quaternary old paralic deposits (Qop2-6) and Miocene	Monitoring agreement with qualified paleontologist. Written verification from the qualified paleontologist that the procedures for treatment of discovered paleontological resources have been carried out.	The City shall provide written evidence that a qualified paleontologist has been retained and ensure that this measure applies during ground disturbing phases of construction.	City of Laguna Beach

Mitigation Measure/ Condition of Approval	Method of Verification	Responsibility/ Timing of Implementation	Enforcement Agency
Topanga Group (Tt) are not observed at the full depth of excavations associated with the subterranean garage, monitoring can be discontinued. Ground-disturbing activities that impact previously disturbed sediments only do not require paleontological monitoring. The duration and timing of the monitoring shall be determined by the Qualified Paleontologist. If the Qualified Paleontologist determines that full-time or part-time monitoring is no longer warranted, he or she may recommend reducing monitoring to periodic spot-checking or may recommend that monitoring cease entirely. Monitoring shall be reinstated if any new ground disturbances of previously undisturbed areas are required, and reduction or suspension shall be reconsidered by the Qualified Paleontologist at that time. If a paleontological resource is discovered, the monitor shall have the authority to temporarily divert construction equipment around the find until it is assessed for scientific significance and collected. Once salvaged, significant fossils shall be prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County [NHMLAC] or UCMP). Curation fees are the responsibility of the project owner. A final report shall be prepared describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to City. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.			
Noise			
NOI-1: Exterior-to-Interior Sound Insulation			
For northern hotel units with direct line-of-sight to SR-1, the project applicant shall coordinate with project architects and other contractors to incorporate design measures for windows, walls, doors, and any other openings in the building shell that could reduce noise levels to the applicable limit. Possible noise reduction techniques include: Exterior doors (including sliding glass doors) and windows would be installed such that there are no air gaps or perforations. Exterior doors and windows would be mounted in low air infiltration rate frames (0.5 cubic feet per minute or less, per ANSI specifications).	Written from Analysis. verification Acoustical	The applicant shall provide written proof that an acoustical analysis was performed prior to the issuance of an occupancy permit to demonstrate that noise levels do not exceed the interior noise standard of 45	City of Laguna Beach

Mitigation Measure/ Condition of Approval	Method of Verification	Responsibility/ Timing of Implementation	Enforcement Agency
Exterior doors would have a solid core with perimeter weather-stripping and threshold seals with a Sound Transmission Class (STC) rating of at least 31, with a potential for STC rating of 36 or higher if necessary. Exterior walls would include minimum of 5/8-inch of stucco or brick veneer over a minimum 1/2-inch plywood or OSB shear panel, R11 insulation and interior 5/8-inch gypsum board. Exterior walls would have a STC rating of at least 46. Dual-paned windows would be installed with a STC rating of at least 31, with the potential for STC rating of 36 or higher if necessary. If exterior sliding glass doors are included, high-performance glazing would be installed with a minimum STC rating of 36. Air conditioning or mechanical ventilation systems would be installed to allow windows and doors to remain closed for extended intervals of time so that acceptable interior noise levels can be maintained. The mechanical ventilation system would meet the criteria of the International Building Code (Chapter 12, Section 1203.3 of the 2001 California Building Code) and the provisions of LBMC Section 7.25.130.		CNEL in any habitable room as set forth by the City.	
NOI-2: HVAC Equipment Noise Abatement			
The project applicant shall comply with the LBMC Sections 7.25.040(B) and 7.25.130, including the strictest noise level standard of 50 dBA Leq during nighttime hours, through measures such as, but not limited to: Siting all new on-site HVAC equipment out of direct line-of-sight from residential receivers. Use of mechanical rooms/enclosures (e.g., fencing with insulation, internal sound compression blanket, shock absorption base) or parapets (applicable to rooftop-mounted equipment) that block line-of-sight to receivers so that noise levels comply with LBMC Sections 7.25.040(B) and 7.25.130. Sound attenuation techniques should be used and maintained in accordance with the manufacturer's specifications for the life of the equipment.	Review and approval of HVAC siting plans.	The City shall require that the applicant submits plans for the siting of new HVAC equipment that include the specified noise abatement measures.	City of Laguna Beach

Mitigation Measure/ Condition of Approval	Method of Verification	Responsibility/ Timing of Implementation	Enforcement Agency
Tribal Cultural Resources			
TCR-1: Unanticipated Discovery of Tribal Cultural Resources			
In the event that a cultural resource of Native American origin is found during project-related ground disturbance, excavation and other construction activity in that area shall cease. If the City of Laguna Beach, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The mitigation plan may include but would not be limited to avoidance, capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon means.	Written verification from Native American monitor/consultant of compliance with procedures for treatment of discovered Tribal cultural resources.	The City shall retain a Native American Monitor prior to the commencement of construction activities and monitoring will be conducted continuously during ground disturbing activities.	City of Laguna Beach

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