



**ATTACHMENT A
BACKGROUND, PROJECT DESCRIPTION, AND JUSTIFICATION FOR CEQA EXEMPTIONS**

1.0 PROJECT LOCATION AND EXISTING CONDITIONS

1.1 Project Location

The San Clemente Brush Clearance Project (proposed project) spans approximately 33.7 acres and is located within the City of San Clemente in Orange County, California (APN 678-163-01). The project site is an undeveloped field situated north of Via Sonrisa, directly across from residential homes, and south of the San Clemente Aquatics Center and an adjacent soccer hub. This area has been identified for goat brush clearance to address vegetation management and reduce potential fire hazards in proximity to nearby facilities and residences. See **Figure 1** through **Figure 3**, which depict the project site on both regional and local scales, and **Figure 4**, which includes photographs of the project site.

1.2 Existing Conditions Onsite

The project site is a City-owned undeveloped field with dense, overgrown vegetation, including invasive mustard and thistle plants. This location has been identified for brush clearance as part of a vegetation management effort aimed at mitigating wildfire risks. Through targeted goat grazing, the project focuses on removing these flammable species to reduce the potential spread of fire to adjacent facilities and residential communities.

1.3 Surrounding Uses

The project site is surrounded by the San Clemente Aquatics Center, Vista Hermosa Sports Park, a soccer hub, Orange County Fire Station and Target to the north, single-family residential homes to the south, and undeveloped land to the east and west (Google Earth Pro, 2025).

1.4 General Plan Land Use and Zoning

The project site has a General Plan land use designation of Open Space Public (OS1) and a zoning designation Forster Ranch Specific Plan Sector P Public Open Space (FRSP P-OS1) (City of San Clemente, 2024). Refer to **Table 1**, which details the General Plan land use designations, zoning designations, and existing development of the project site and surrounding areas.

**Table 1.4-1
EXISTING LAND USES ON THE PROJECT SITE AND SURROUNDING AREA**

Location	Land Use	Zoning District	Existing Development
Project Site	Open Space Public (OS1)	Forster Ranch Specific Plan Sector P Public Open Space (FRSP P-OS1)	Undeveloped
North	Open Space Private (OS2), Neighborhood Commercial 1.2 (NC 1.2) with Housing (H) Overlay, Public (P)	Forster Ranch Specific Plan Sector P Public Open Space (FRSP P-OS1), Forster Ranch Specific Plan Sector P Neighborhood Commercial 1.2 (FRSP P-NC 1.2) with Housing (H) overlay, Forster Ranch Specific Plan Sector P Public (FRSP P-P)	Undeveloped, San Clemente Aquatics Center, Vista Hermosa Sports Park, Soccer Field, Orange County Fire Station 59, Target



South	Open Space Private (OS2), Residential Low Density (RL)	Rancho San Clemente Specific Plan Private Open Space (RSCSP OS2), Rancho San Clemente Specific Plan Mixed Use Concept Plan Residential Low (RSCSP MU-RL)	Undeveloped, Single-Family Residential
East	Open Space Public (OS1), Open Space Private (OS2)	Forster Ranch Specific Plan Sector P Public Open Space (FRSP P-OS1), Talega Specific Plan Private Open Space (TSP OS2)	Undeveloped
West	Open Space Public (OS1), Open Space Private (OS2)	Forster Ranch Specific Plan Sector P Public Open Space (FRSP P-OS1), Rancho San Clemente Specific Plan Private Open Space (RSCSP OS2)	Undeveloped

Sources: City of San Clemente 2024a; City of San Clemente 2024b; Google Earth Pro, 2025.



Figure 3
PROJECT LOCATION MAP



Path: \\GIS\svr\gis\Projects\7313_San_Clemente_Drush_Clearance\MXD\7313_San_Clemente_Drush_Clearance_3_0\Project_Location_2025_01_16.mxd
 Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community; UltraSystems Environmental, Inc., 2025. January 16, 2025

Scale: 1:5,400



0 225 450 Feet

0 50 100 Meters

Legend

- Project Boundary
- Goat Pen

San Clemente
Brush Clearance Site #1
 Project Location



Figure 4
PROJECT SITE PHOTOGRAPHS



PHOTO 1: View facing southeast from the project site.



PHOTO 2: Project site goat grazing area.



PHOTO 3: Goat grazing enclosure (7,500 sf) located on the western portion of the project site.



PHOTO 4: Thistle and mustard plants in the project site.

Source: UltraSystems Environmental Inc., 2024



2.0 DESCRIPTION

The proposed project involves vegetation management on a 33.7-acre site through controlled goat grazing. Grazing operations will be managed using electronic fencing to facilitate controlled land rotation, ensuring even vegetation removal while preventing overgrazing and mitigating the risk of pasture erosion. The primary focus of the project is the removal of overgrown, non-native, and invasive species, with careful measures taken to preserve and protect native vegetation.

The project aims to reduce wildfire risk by systematically grazing on flammable invasive species, such as dry grasses and brush which serve as primary fuel for wildfires. By clearing these fuels and creating more open, less dense vegetation, the goats establish natural firebreaks that slow the spread of flames and reduce the intensity of potential fires. This method is particularly beneficial in wildland-urban interface areas, as it helps to create defensible space around homes and structures, providing a critical buffer that protects properties and increases the likelihood of successful firefighting efforts during a wildfire event.

The site will be monitored and managed by professional staff to ensure its proper stewardship. To support grazing management, goats will periodically be housed within a 7,500-square-foot enclosure. While the grazing activities are planned as a short-term measure lasting no more than five months, the enclosure will remain in place for an extended period of time. This project aims to enhance ecological health by controlling invasive species and fostering wildfire resilience.

Additionally, UltraSystems Environmental biological resources staff did a survey of the project site, along with a survey of the area where goats would be kept during nighttime activities. Information related to biological resources is included within the Technical Appendix of this document.

2.1 Project Construction

Project activities are expected to last a minimum of 3 months and maximum of 5 months.

3.0 REASONS WHY THE PROJECT IS EXEMPT

3.1 Conditions Set Forth in CEQA Guidelines Sections 15301 and 15303

CEQA Guidelines § 15301 sets forth the following conditions projects must meet to qualify for a Class 1 (Existing Facilities) categorical exemption:

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The key consideration is whether the project involves negligible or no expansion of use. An example of this exemption includes, but is not limited to:

(h) Maintenance of existing landscaping, native growth, and water supply reservoirs (excluding the use of pesticides, as defined in Section 12753, Division 7, Chapter 2, Food and Agricultural Code)

This project qualifies for a **Class 1** (Existing Facilities) categorical exemption under CEQA as it involves minor alterations to existing topographical features for the purpose of maintaining the site's ecological balance and reducing wildfire risk. The goat vegetation management project will not result



in any expansion of use, as the grazing activities are planned as a short-term, temporary measure. Specifically, the project aligns with subsection (h) as it focuses on the maintenance of existing landscaping and native growth by targeting invasive plant species while preserving sensitive native vegetation. The use of goats as a natural, non-mechanical method ensures negligible environmental impact while supporting ecosystem health and wildfire mitigation efforts.

CEQA Guidelines § 15304 sets forth the following conditions projects must meet to qualify for a Class 4 (Minor Alterations to Land) categorical exemption:

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. Examples include, but are not limited to:

(b) New gardening or landscaping, including the replacement of existing conventional landscaping with water efficient or fire-resistant landscaping.

(i) Fuel management activities within 30 feet of structures to reduce the volume of flammable vegetation, provided that the activities will not result in the taking of endangered, rare, or threatened plant or animal species or significant erosion and sedimentation of surface waters. This exemption shall apply to fuel management activities within 100 feet of a structure if the public agency having fire protection responsibility for the area has determined that 100 feet of fuel clearance is required due to extra hazardous fire conditions.

The goat vegetation management project qualifies for a **Class 4** (Minor Alterations to Land) categorical exemption as it involves minor alterations to the condition of land and vegetation without the removal of healthy, mature, or scenic trees. The project aligns with subsection (b) by replacing overgrown and invasive vegetation with a more sustainable, fire-resistant landscape through targeted grazing. It also meets the criteria of subsection (i) by implementing fuel management activities to reduce the volume of flammable vegetation within 30 feet of structures, thereby decreasing wildfire risk and creating defensible space. These activities will be carefully managed to avoid significant erosion, sedimentation, or harm to endangered, rare, or threatened species, ensuring that the project remains environmentally sensitive while effectively mitigating wildfire hazards.

CEQA Guidelines § 15359 sets forth the following conditions projects must meet to qualify for a Class 59 (Emergency) categorical exemption:

“Emergency” means a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to life, health, property, or essential public services. Emergency includes such occurrences as fire, flood, earthquake, or other soil or geologic movements, as well as such occurrences as riot, accident, or sabotage.

The goat vegetation management project qualifies for a **Class 59** (Emergency) categorical exemption because it addresses a sudden and imminent wildfire risk that poses a clear and immediate danger to life, health, property, and essential public services. Given the ongoing wildfire activity in Southern California as of January 2025, the project aims to mitigate the threat by rapidly reducing flammable vegetation, creating defensible space around structures, and preventing the spread of fires to nearby homes and communities. The immediate action taken through this vegetation management aligns with the emergency definition, which addresses occurrences like wildfire that demand urgent intervention to protect lives, health, and infrastructure.



CONCLUSION

Class 1 (**Existing Facilities**), Class 4 (**Minor Alterations to Land**), and Class 59 (**Emergency**) categorical exemptions both apply to the proposed project

4.0 REFERENCES

City of San Clemente, 2024a. City of San Clemente Community Map. Accessed online at <https://experience.arcgis.com/experience/99dcf9f350944f0b909c853ddbcbf76d6/07ac786c652b>, on January 16, 2025.

City of San Clemente, 2024b. City of San Clemente General Plan. Accessed online at <https://www.san-clemente.org/home/showpublisheddocument/24913/638030018906470000>, on January 15, 2025.

Google Earth, 2025. Accessed online at https://www.google.com/maps/@33.4598637,-117.6082161,1881m/data=!3m1!1e3?entry=ttu&g_ep=EgoyMDI1MDExMC4wIKXMDSoASAFAQw%3D%3D, on January 16, 2025.

APPENDICES



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

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 Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community; UltraSystems Environmental, Inc., 2025.

January 15, 2025

Scale: 1:1,440





Legend

Project Boundary

**San Clemente
Brush Clearance**

Project Location

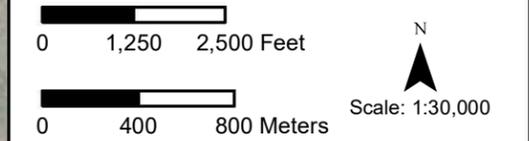


**San Clemente
Brush Clearance Site #1**

Legend

-  Zone Boundary
-  Project Boundary
-  2-Mile Radius
-  Coulter's saltbush *Atriplex coulteri*
-  Southern Coast Live Oak Riparian Forest
-  Southern Coast Live Oak Riparian Forest
-  Southern Sycamore Alder Riparian Woodland
-  Southern Sycamore Alder Riparian Woodland
-  Valley Needlegrass Grassland
-  Needlegrass Grassland
-  intermediate mariposa-lily *Calochortus weedii* var. *intermedius*
-  many-stemmed dudleya *Dudleya*
-  thread-leaved brodiaea *Brodiaea*

Key Map



**CNDDB Known Occurrences
Plant Species and Habitats**

Figure #



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

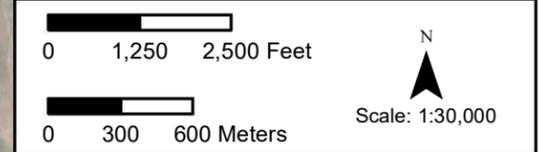
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 Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community; CDFW, January, 2025; UltraSystems Environmental, Inc., 2025.

**San Clemente
Brush Clearance Site #1**

Legend

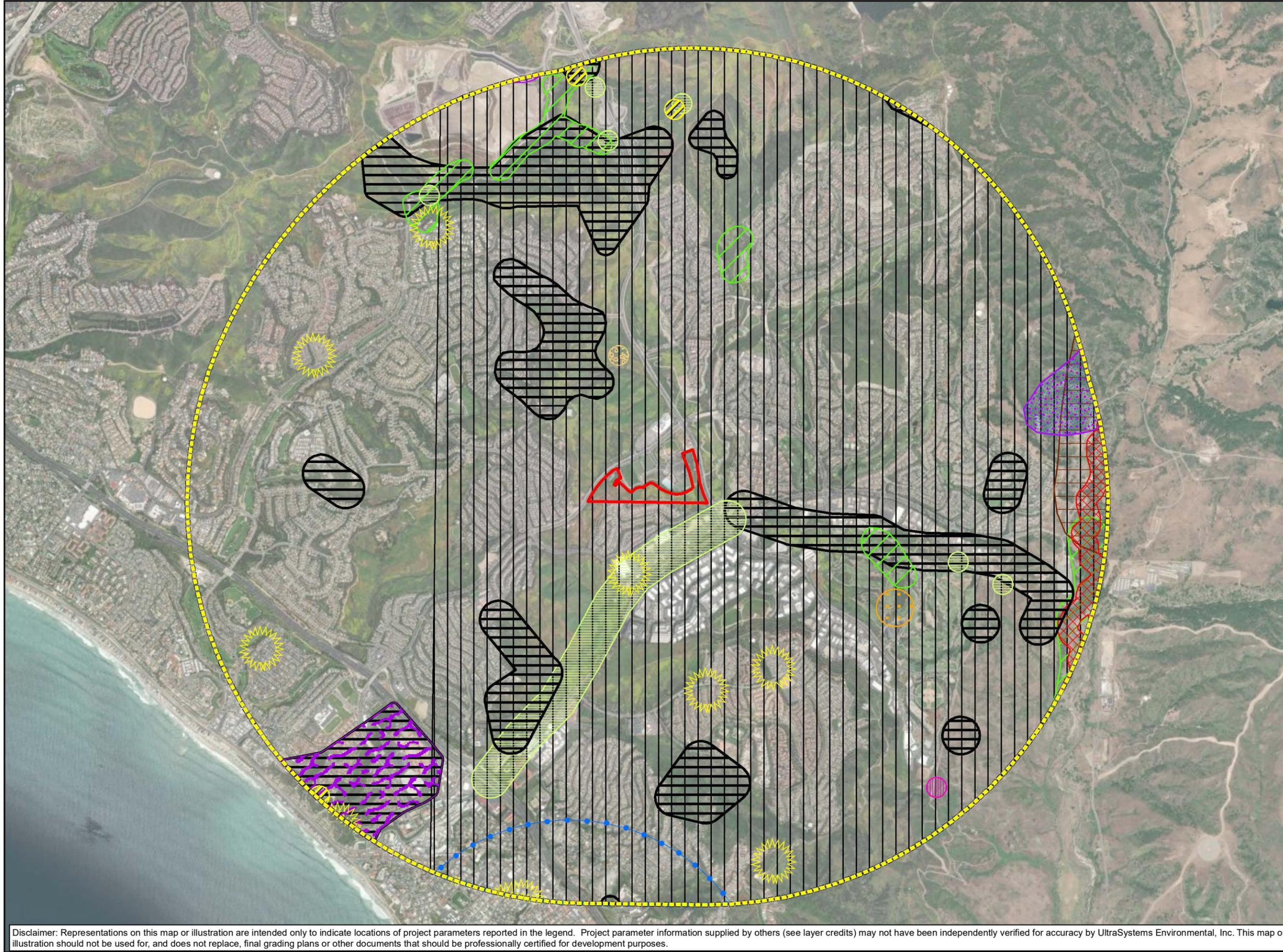
-  Project Boundary
-  2-Mile Radius
-  American bumble bee *Bombus pensylvanicus*
-  Mexican long-tongued bat *Choeronycteris mexicana*
-  Riverside fairy shrimp *Streptocephalus woottoni*
-  arroyo toad *Anaxyrus californicus*
-  burrowing owl *Athene cunicularia*
-  coast horned lizard *Phrynosoma blainvillii*
-  coastal California gnatcatcher *Poliophtila californica californica*
-  coastal cactus wren *Campylorhynchus brunneicapillus sandiegensis*
-  least Bell's vireo *Vireo bellii pusillus*
-  monarch - California overwintering population *Danaus plexippus plexippus* pop. 1
-  orange-throated whiptail *Aspidoscelis hyperythra*
-  southern California rufous-crowned sparrow *Aimophila ruficeps canescens*
-  western spadefoot *Spea hammondi*
-  white-tailed kite *Elanus leucurus*
-  yellow-breasted chat *Icteria virens*

Key Map



**CNDDDB Known Occurrences
Wildlife Species**

Figure #
 UltraSystems
 environmental management planning



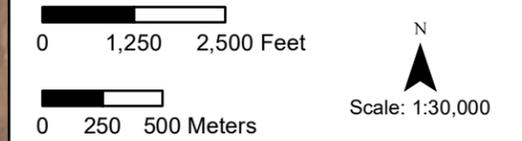
Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

**San Clemente
Brush Clearance Site #1**

Legend

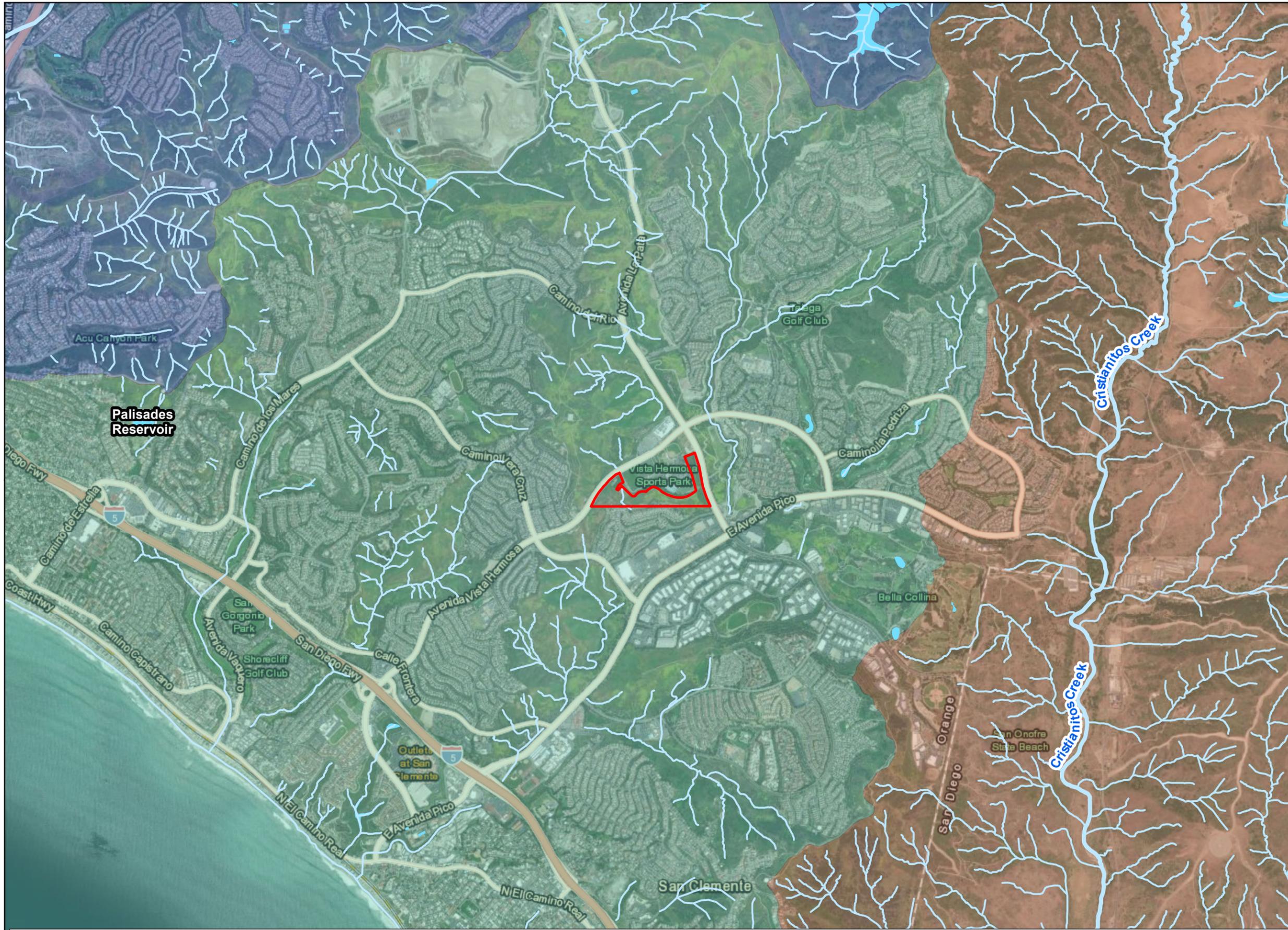
- Project Boundary
 - USGS Stream (Named)
 - USGS Stream
 - USGS Waterbody
- HUC12, Name**
- 180703010104, Lower San Juan Creek
 - 180703010203, Lower San Mateo Creek
 - 180703010303, Prima Deshecha Canada-Frontal Capistrano Bight

Key Map



USGS Surface Waters and Watersheds

Figure #



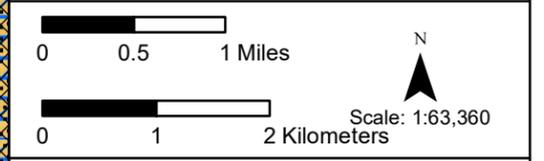
Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

**San Clemente
Brush Clearance Site #1**

Legend

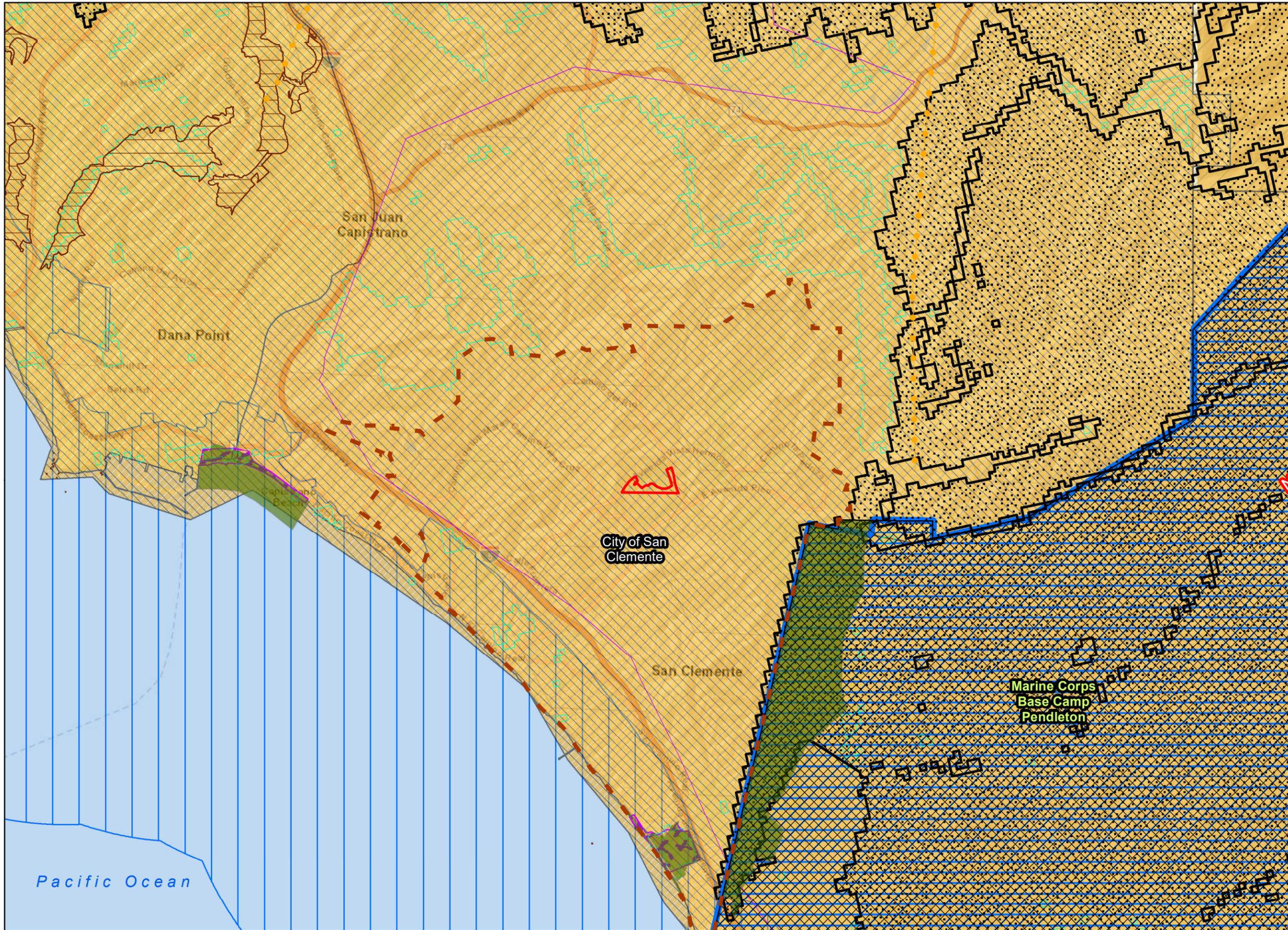
-  Project Boundary
-  City of San Clemente
-  Missing Linkages in California's Landscape
-  Military_Bases
-  Park Boundaries
-  Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC)
-  Land Use Change Probability - 2100 - USGS (Habitat Reserve System)
-  Core Habitat Areas - Region 5 - Connectivity Monitoring Strategic Plan
-  Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC)
-  Department of Defense
-  State Land
- Land Management Area**
-  Military Installations
-  Bureau of Land Management
-  State Lands
- Conservation Plan (HCP/NCCP)**
-  HCP, Orange County Southern Subregion
-  HCP/HCP, County of Orange Central/Coastal Subregion
-  NCCP/HCP, Orange County Transportation Authority
-  NCCP/HCP, San Diego County Water Authority
-  NCCP/HCP, San Diego Gas and Electric Subregional
-  NCCP/HCP, San Diego North County Multiple Species Conservation Plan
-  Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)
-  Terrestrial Connectivity -
-  California Coastal Zone

Need to review which of above to turn off



**Management Plan and
Land Designation Areas**

Figure #



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