



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 Site 2 Project (proposed project) spans approximately 15.87 acres and is located within the City of San Clemente in Orange County, California (APN 701-041-62). The project site is situated north of Avenida Pico, east of Cristianitos Rd, and west of Camino La Pedriza which borders Unincorporated Orange County. See **Figure 1** through **Figure 3**, which depicts 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 an undeveloped area 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. By removing these flammable species, the project seeks to reduce the potential fire hazards that could spread to nearby facilities and residential communities.

1.3 Surrounding Uses

The project site is surrounded by medium-density residential to the west, and undeveloped land to the north, east, and south. (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 Private (OS2) and a zoning designation Talega Specific Plan (TSP) (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 Private (OS2)	Open Space Private (OS2) with Talega Specific Plan (TSP)	Undeveloped
North	Open Space Private (OS2), RM (Residential Medium Density)	Residential Medium (RM) with Talega Specific Plan Overlay	Undeveloped, Multi-Family Residences
South	Open Space Private (OS2)	Open Space Private (OS2) Talega Specific Plan (TSP)	Undeveloped
East	Planned Community (PC)	Planned Community (PC)	Undeveloped
West	Open Space Private (OS2), RH (Residential High Density)	Residential High (RH) with Talega Specific Plan Overlay	Undeveloped, Multi-Family Residences

Sources: City of San Clemente 2024a; City of San Clemente 2024b; Google Earth Pro, 2025; Orange County Public Works, 2021.



Figure 1
REGIONAL LOCATION MAP



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Path: \\gis\v\proj\7314 San Clemente Brush Clearance Site\2\MXD\7314 San Clemente Brush ClearanceSite2 2.0 Regional 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; UltraSystems Environmental, Inc., 2025.

January 16, 2025

Scale: 1:633,600



0 5 10 Miles

0 5.5 11 Kilometers

Legend

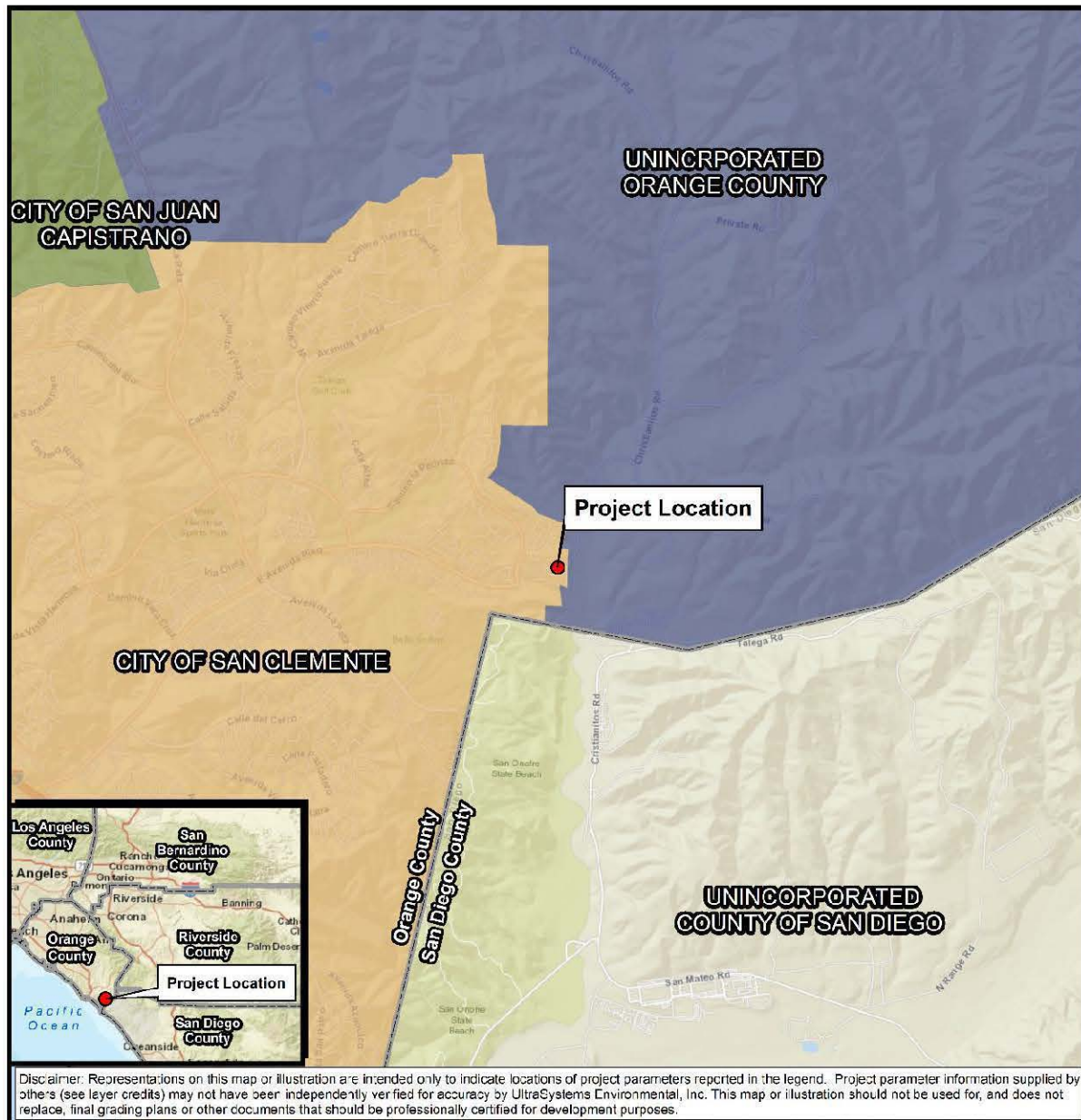
 Project Location

San Clemente
Brush Clearance Site #2
Regional Location





Figure 2
PROJECT VICINITY MAP



Path: \\G:\sv\gis\Projects\7314_San_Clemente_Brush_Clearance_Site2\MXD\7314_San_Clemente_Brush_ClearanceSite2_3_0_Project_Vicinity_2025_01_16.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, U3G, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; Orange County, 2022; County of San Diego, 2022; UltraSystems Environmental, Inc., 2024

January 10, 2025

Scale: 1:48,000



0 2,000 4,000 Feet

0 500 1,000 Meters

Legend

- Project Location
- County Boundary

San Clemente
Brush Clearance Site #2

Project Vicinity





Figure 3
PROJECT LOCATION MAP



Path: \\Gissrv\gis\Projects\7314_San_Clemente_Drush_Clearance_Site2\MXD\7314_San_Clemente_Drush_ClearanceSite2_3_0_Project_Location_2025_01_10.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; Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community; UltraSystems Environmental, Inc., 2025.

January 10, 2025

Scale: 1:3,300



0 137.5 275 Feet

0 25 50 Meters

Legend

 Project Boundary

**San Clemente
Brush Clearance Site #2**

Project Location
and Parcel



Figure 4
PROJECT SITE PHOTOGRAPHS



PHOTO 1: View looking at Avenida Pico from south of the project site.



PHOTO 2: View facing east from the project site.



PHOTO 3: View looking at the eastern portion of the project site.



PHOTO 4: View looking at the project site from Cristianitos Rd.

Source: UltraSystems Environmental Inc., 2024



2.0 DESCRIPTION

The City of San Clemente plans to implement wildfire resilience measures at the project site. The project will involve targeted vegetation management, including the manual trimming and removal of yellow mustard and artichoke thistle plants. Additionally, mechanical equipment such as a front-end loader and, potentially, a chipper shredder may be utilized. These vegetation management efforts aim to support wildfire mitigation initiatives, such as establishing strategic fuel breaks and maintaining defensible space around residential areas. All work activity would be supervised in the field by public works personnel.

Additionally, UltraSystems Environmental went into the field and flagged any potentially sensitive plant species. All maps for biological resources are included in the **technical appendices**.

2.1 Project Construction

The project activities are scheduled to take place on January 18, 2025 with the participation of volunteers and City public works maintenance personnel. The work is expected to last approximately three hours, though the duration may vary based on the City's needs and requirements.



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 through targeted vegetation management, consistent with the maintenance of the site's current undeveloped condition. Activities such as the removal of mustard and thistle plants align with the exemption criteria for maintaining existing landscaping and native growth, supporting ecosystem health and wildfire mitigation efforts. The use of mechanical equipment, including front-end loaders and chipper shredders, is restricted to localized maintenance operations and will not entail any significant expansion or intensification outside of the site.

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.

This project qualifies for a **Class 4** (Minor Alterations to Land) categorical exemption under CEQA as it involves minor alterations to vegetation conditions without the removal of healthy, mature, scenic trees, consistent with the exemption's scope. The targeted removal of invasive mustard and thistle plants supports fuel management objectives by reducing flammable vegetation, aligning with subsection (i), which allows for such activities within 30 feet of structures and up to 100 feet if required by the local fire authority; so long as no significant impacts to erosion, sedimentation, or to endangered, rare, or threatened species. These activities also align with subsection (b) by promoting fire-resistant landscaping practices in support of wildfire mitigation efforts.



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.

This project qualifies for a **Class 59 (Emergency)** categorical exemption under CEQA as it addresses an imminent danger posed by wildfire risks in Southern California, a region currently experiencing heightened wildfire activity as of January 2025. The exemption applies to projects undertaken in response to sudden and unexpected occurrences, such as fire, that pose a clear and immediate threat to life, health, property, or essential public services. The planned vegetation management activities—including the removal of flammable invasive species like mustard and thistle plants are critical preventive measures to reduce wildfire fuel loads and establish defensible space near residential areas.

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

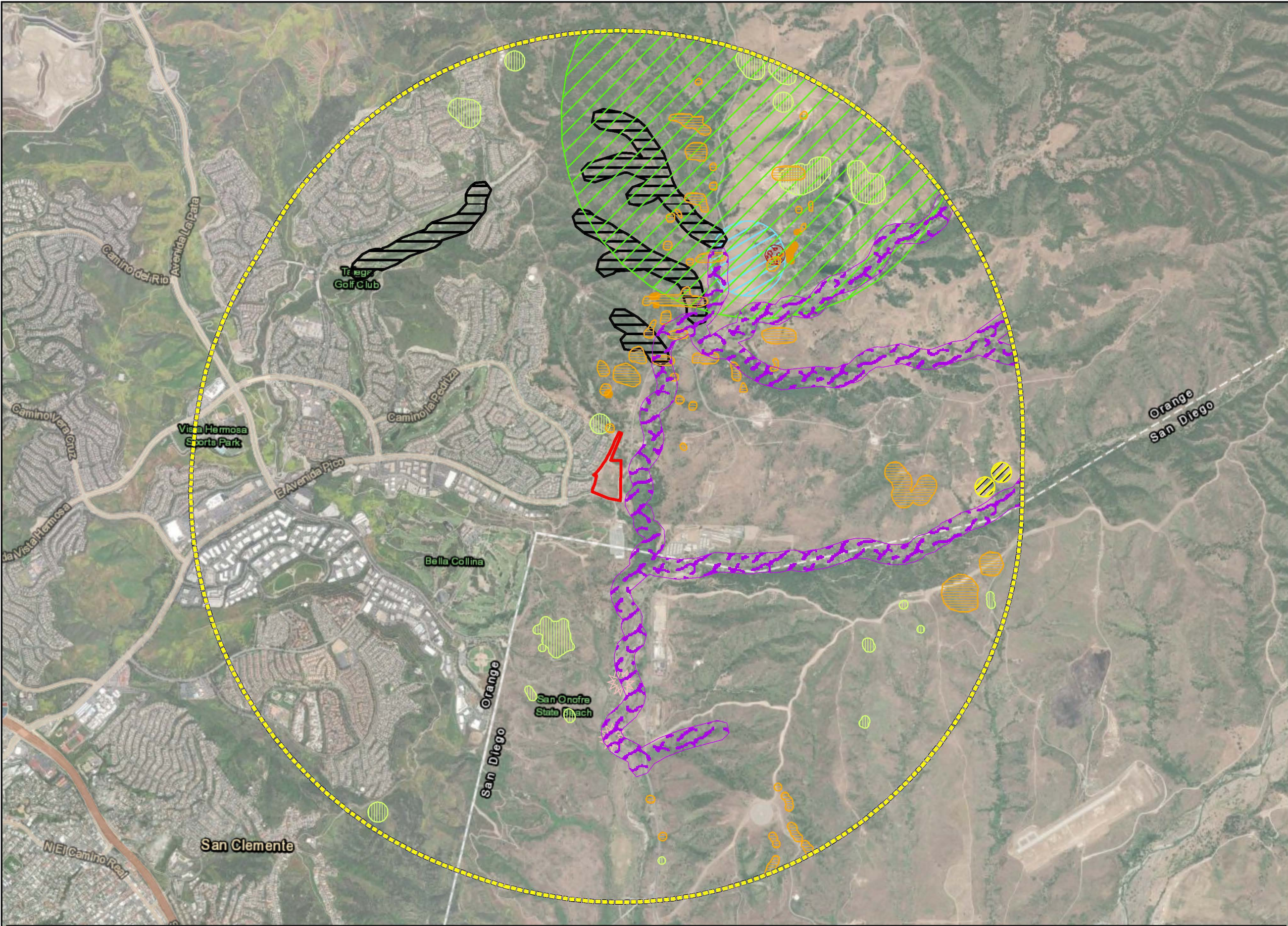
City of San Clemente, 2024a. City of San Clemente Community Map. Accessed online at <https://experience.arcgis.com/experience/99dcf9f350944f0b909c853ddbcf76d6/07ac786c652b>, on January 16, 2025.

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/@33.457146,-117.5727296,1098m/data=!3m1!1e3?entry=ttu&_ep=EgoyMDI1MDExMC4wIKXMDSASAFAQw%3D%3D, on January 16, 2025.

Orange County Public Works. Unincorporated Orange County Zoning. Accessed online at https://data-ocpw.opendata.arcgis.com/datasets/b4df34ad1ea749919b9101e4e0f6186e_0/explore, on January 16, 2025.

APPENDICES



San Clemente

Brush Clearance Site #2

Legend

Project Boundary

2-mile Radius

Coulter's saltbush *Atriplex coulteri*

Palmer's grapplehook *Harpagonella palmeri*

Southern Coast Live Oak Riparian Forest

Southern Sycamore Alder Riparian Woodland

Valley Needlegrass Grassland

chaparral nolina *Nolina cismontana*

intermediate mariposa-lily *Calochortus weedii* var. *intermedius*

many-stemmed dudleya *Dudleya multicaulis*

thread-leaved brodiaea *Brodiaea filifolia*

white rabbit-tobacco *Pseudognaphalium leucocephalum*

Key Map

0 1,250 2,500 Feet

0 400 800 Meters

N

Scale: 1:30,000

CNDDB Known Occurrences

Plant Species and Habitats

Figure #

UltraSystems

environmental management planning

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January 16, 2025

