INITIAL STUDY (Draft)
Juanita Way Road Expansion Project
LAGUNA BEACH, CALIFORNIA

Prepared for:

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SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

1.1 PROJECT PURPOSE

The purpose of the Juanita Way Road Expansion Project (Project) is to construct an additional 18.5 linear feet of road surface at the terminus of Juanita Way to facilitate driveway access for the construction of a single-family home.

1.2 PROJECT LOCATION AND SITE CHARACTERISTICS

1.2.1 Location

The City of Laguna Beach (City) was founded on June 29, 1927, and is a small town of picturesque beaches, hiking trails, a walkable downtown, and summer art festivals. The City is located in southwest Orange County and occupies 8.84 square miles. The Project site is located at 2400 Juanita Way (APN 656-131-04), which is in a residential neighborhood.

1.2.2 Existing Environmental Setting

Located east from the Project site, the existing residential neighborhood generally consists of dead-end streets bisected by Alta Vista Way and terraced across the steep hillside slope. The hillside neighborhood is characterized by dense single-family development with surrounding open space. Surrounding land uses around the Project site include single-family residences to the south and east, with open space area to the north that separates this R-1 neighborhood from the developed portions of the Diamond/Crestview and Arch Beach Heights communities. The property currently fronts unimproved segments of Juanita and Iris Way, and shares a property line with the single family dwelling located at 2470 Juanita Way.

The Project site is located on a vegetated, undeveloped parcel of land that is designated as an Environmentally Sensitive Area (ESA) due to its classification under drainage, Open Space Preserve (OSP), High-Value Habitat (HVH), Fuel Modification Zone (FM), and High Fire Hazard Severity Zone (HFHSZ). The property is located on a hillside with a significant grade, characterized by rugged terrain typical of the coastal foothills in the region. The proposed driveway along the southern end of the Project site features slopes ranging from 2% to 30.9%. The remainder of the Project site features slopes ranging from 30.9% to 66%.

1.3 PROJECT BACKGROUND

The City received an application from Brion Jeannette, the architect for Patrick and Kim Lustig, dated July 14, 2017 for a proposed road extension. On October 16, 2019, the City considered the application during concept review. The City most recently received a revised application on December 7, 2023 for a proposed road extension. The project scope consists of adding approximately 18.5 linear feet of road surface at the terminus of Juanita Way. The proposed street access would facilitate the creation of a new building site and the potential development of a single-family residence at 2400 Juanita Way (APN 656-131-04).

1.4 PROJECT OBJECTIVES

The objective of the Proposed Project is to construct an additional 18.5 linear feet of road surface, in compliance with City policies, at the terminus of Juanita Way to facilitate driveway access for the potential construction of a single-family home. A comprehensive list of Project objectives will be developed and presented in the EIR, and may include modifications or additions based on further Project refinement.

1.5 PROJECT DESCRIPTION

The Applicant proposes to extend the road at the terminus of Juanita Way in the City of Laguna Beach, California. The project scope consists of adding approximately 18.5 linear feet of road surface at the terminus of Juanita Way. The proposed street access would facilitate the creation of a new building site and the potential development of a single-family residence at 2400 Juanita Way (APN 656-131-04).

1.6 GENERAL PLAN AND ZONING

The Project site is zoned for Residential Low-Density Zone (R-1) and Open Space Preserve. The Project site has a General Plan land use designation of Village Low Density, which is intended to provide for single-family residential development and has been accounted for under General Plan build-out.

1.7 APPLICABLE REGULATIONS

The Proposed Project is subject to multiple provisions of the City's Municipal Code. These include requirements for establishing a building site (See Laguna Beach Municipal Code [LBMC] Section 25.08.004), requirements for dead end streets (See LBMC Section 21.12.220), requirements for street design more generally (See LBMC Chapter 21.12), requirements for road extensions (See LBMC Chapter 11.40), requirements for grading (See Title 22), and requirements for proposed single-family residences in the R-1 neighborhood (See Zoning Ordinance Title 25, and specifically LBMC Chapter 25.10).

1.8 PROJECT SCHEDULE

The exact construction schedule, including start and end dates, staging duration, and sequencing of constructions activities, has not yet been finalized. This information will be provided in the EIR. All construction activities would occur between 7:30 a.m. to 6:00 p.m on weekdays and 9 a.m through 5:00 p.m. on Saturdays per the City's Noise Ordinance. No construction would occur on Sundays or Federal holidays.

1.9 INITIAL STUDY PURPOSE

The purpose of this initial study is to support the preparation of an EIR by identifying potentially significant environmental impacts, while screening out impacts that do not require further analysis in the EIR. Thus, the EIR will solely focus on the effects determined to be significant in this initial study.

Specifically, according to CEQA Guidelines Section 15063(c), the purposes of an initial study are to:

1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.
2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

3) Assist in the preparation of an EIR, if one is required, by:
    a. Focusing the EIR on the effects determined to be significant
    b. Identifying the effects determined not to be significant
    c. Explaining the reasons for determining that potentially significant effects would not be significant, and
    d. Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.
4) Facilitate environmental assessment early in the design of a project;
5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;
6) Eliminate unnecessary EIRs;
7) Determine whether a previously prepared EIR could be used with the project

1.10 PUBLIC REVIEW PROCESS

This initial study will be distributed to responsible and trustee agencies, other affected agencies, and other parties for a 30-day public review period, to whom and where comments can be submitted to. Such comments will be considered and addressed in the EIR.

Specifically, CEQA Guidelines Section 15083 supports an early consultation period in the EIR process:

Prior to completing the draft EIR, the Lead Agency may also consult directly with any person or organization it believes will be concerned with the environmental effects of the project. Many public agencies have found that early consultation solves many potential problems that would arise in more serious forms later in the review process. This early consultation may be called scoping. Scoping will be necessary when preparing an EIR/EIS jointly with a federal agency.

a) Scoping has been helpful to agencies in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important.
b) Scoping has been found to be an effective way to bring together and resolve the concerns of affected federal, state, and local agencies, the proponent of the action, and other interested persons including those who might not be in accord with the action on environmental grounds.
c) Where scoping is used, it should be combined to the extent possible with consultation under Section 15082.

1.11 REQUIRED PERMITS AND APPROVALS

A public agency, other than the Lead Agency, that has discretionary approval power over a project is referred to under the California Environmental Quality Act (CEQA) Guidelines as a "Responsible Agency." Reviewing Agencies include those agencies that do not have discretionary powers but may review the Environmental Impact Report ("EIR") for adequacy and accuracy. Responsible Agencies have discretionary approval authority for a project. Potential Reviewing Agencies and Responsible Agencies include the following:

Regional

- Native American Heritage Commission (NAHC)
- Southern California Edison (SCE)

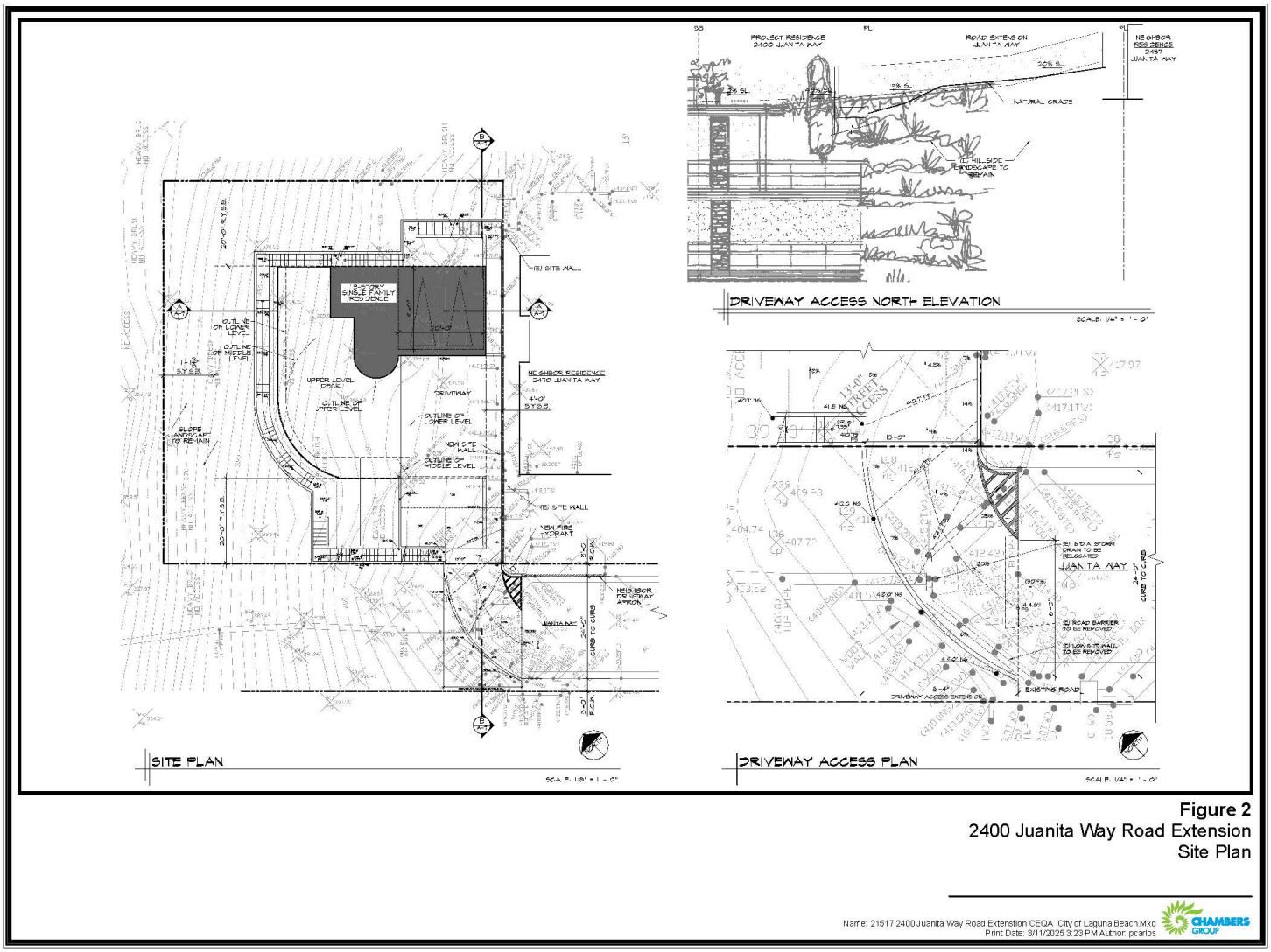
Local

- City of Laguna Beach Public Works
- City of Laguna Beach Fire Department (LBFD)

Figure 1 - Project Location



Figure 2 – Site Plan



SECTION 2.0 – ENVIRONMENTAL DETERMINATION

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

☒ *Aesthetics*	☐ *Agriculture and Forestry Resources*	☒ *Air Quality*
☒ *Biological Resources*	☒ *Cultural Resources*	☒ *Energy*
☒ *Geology /Soils*	☒ *Greenhouse Gas Emissions*	☒ *Hazards & 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*

2.2 DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION (ND)** will be prepared. ☐
2. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION (MND)** will be prepared. ☐
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐
4. I find that the proposed 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 (EIR)** is required, but it must analyze only the effects that remain to be addressed. ☒
5. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or ND pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or ND, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature _____ Date _____

Name _____ Title _____

SECTION 3.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if substantial evidence exists that an effect may be significant. If one or more "Potentially Significant Impact" entries are marked when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or ND. (Section 15063(c)(3)(D).) In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. The explanation of each issue should identify:

    a. the significance criteria or threshold, if any, used to evaluate each question; and

    b. the mitigation measure identified, if any, to reduce the impact to less than significant.

    *Note: Instructions may be omitted from final document.

SECTION 4.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

4.1 AESTHETICS

The aesthetic value of an area is a measure of its visual character and quality, combined with the viewer response to the area. Scenic quality can best be described as the overall impression that an individual viewer retains after driving through, walking through, or flying over an area. Aesthetic resources include scenic resources, which include water forms, trees, rock outcroppings, historic buildings, and scenic highways. Impacts to aesthetic resources include obstruction and destruction of views to or from scenic resources and/or the degradation of the visual character of the area.

The Proposed Project is located in a residential neighborhood in the City of Laguna Beach on Juanita Way. The surrounding area consists of residential neighborhoods and open space consisting of undeveloped hillsides and canyons.

Per LBMC Section 25.05.040, proposed development is required to undergo the design review process, which includes evaluation by the designated approval authority, either the Design Review Board or the Planning Commission. The design review process ensures that development projects meet applicable standards, prioritize quality and context-sensitive design, maintain aesthetic harmony, minimize disputes, consider public and private views, uphold public health and safety, align with general and specific plan policies, and comply with the Local Coastal Program Land Use Plan.

1.	**AESTHETICS.** **Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(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)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings? 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 which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 Impact Analysis

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

Potentially Significant Impact. The Laguna Beach General Plan includes an Open Space and Conservation Element (OSCE) that was adopted in 1984 and last updated in 2005. The OSCE includes a collection of general plan policies that addresses the potential adverse effects of development on a natural hillside setting, including the scenic environment. The OSCE notes that undeveloped hillside lands support a great diversity of visual resources, with prominent exposure from both public and private property.

The Project site is located within an established residential neighborhood. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way to facilitate driveway access for the construction of a single-family home. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. On October 16, 2019, the City considered the application during concept review. The City determined that the Proposed Project could potentially conflict with numerous policies defined in the General Plan Open Space Conservation Element (OSCE), Land Use Element (LUE), and the Transportation, Circulation and Growth Management Element (City 2019c). Therefore, the Proposed Project could potentially result in a significant impact on a scenic vista due to conflicts with the General Plan. This impact will be fully analyzed in the EIR.

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

No Impact. The Laguna Beach General Plan includes a Landscape and Scenic Highways Element (LSHE) which was last updated in 2018. The purpose of the LSHE is to preserve, enhance, and sustain landscapes and scenic corridors essential to the character of Laguna Beach. The LSHE focuses on sustainability, preservation, and improvement of the City's distinct neighborhoods, natural open space, highways – Pacific Coast Highway, Laguna Canyon Rd, and El Toro Rd; other streetscapes and parks; and heritage trees and landscapes. Projects and structures that obscure or block viewsheds, vistas, or lookout points are considered to have a substantial impact on aesthetic resources.

The LSHE identifies three arterial roads within and adjacent to Laguna Beach that meet local scenic highway designation guidelines: Pacific Coast Highway (SR-1), Laguna Canyon Rd, and El Toro Rd (City 2018). The nearest officially designated State scenic highway is a portion of State Route (SR) 91, approximately 22 miles north of the Project site. The nearest eligible State scenic highway is a portion of SR-1, located approximately 0.3 miles southwest of the Project site (CalTrans 2024). The Project site is not located adjacent or within the view of SR-91 or SR-1. Furthermore, the Proposed Project is subject to the City's design review process to ensure preservation of scenic resources. Therefore, no impact would occur to scenic resources within a state scenic highway. No further analysis is required.

c) Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Potentially Significant Impact. The Project site and the surrounding area consist of residential uses and undeveloped canyon land. The Project site is zoned for Residential Low-Density Zone (R-1) and Open Space Preserve (City 2024a). Implementation of the Proposed Project could potentially degrade the existing visual character or quality of public views of the site and its surroundings. The City determined that the Proposed Project could potentially conflict with numerous policies defined in the General Plan Open Space Conservation Element (OSCE), Land Use Element (LUE), and the Transportation, Circulation and Growth Management Element (City 2019c). This impact will be fully analyzed in the EIR.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Proposed Project would not include the installation of streetlights or other public right-of-way illumination. However, the Proposed Project may incorporate outdoor lighting

features such as wall-mounted fixtures, landscape uplighting, or security lighting**.** The LBMC Chapter 7.70*, Good Neighbor Outdoor Lighting*, requires that all outdoor lighting must be hooded, fully shielded, and aimed downward. Additionally, this Municipal Code prohibits light trespass that results in glare. Compliance with this regulation would reduce impacts to less than significant levels. No further analysis is required.

Issues Requiring Further Study: Impacts associated with sections a) and c) are deemed potentially significant and will be fully analyzed in the EIR.

4.2 AGRICULTURE & FORESTRY RESOURCES

Agricultural resources include prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and commercial grazing land as defined in the Guidelines for the Farmland Mapping and Monitoring Program, pursuant to Section 65570 of the Government Code, as well as land in a Williamson Act contract.

Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor and without intolerable soil erosion (7 United States Code [U.S.C.] 4201(c)(1)(A)).

Unique farmland is land other than prime farmland that is used for the production of specific high-value food and fiber crops such as citrus, tree nuts, olives, cranberries, fruits, and vegetables (7 U.S.C. 4201(c)(1)(B)).

Additional farmland of statewide or local importance is land identified by state or local agencies for agricultural use, but not of national significance (7 U.S.C. 4201(c)(1)(C)).

The California Legislature passed the Williamson Act in 1965 to preserve agricultural and open-space lands by discouraging premature and unnecessary conversion to urban uses. The Act creates an arrangement whereby private landowners contract with counties and cities to voluntarily restrict their land to agricultural and compatible open-space uses.

The Williamson Act is a means to restrict the uses of agricultural and open-space lands to farming and ranching uses during the length of the contract period. The Williamson Act Program was also envisioned as a way for local governments to integrate the protection of open space and agricultural resources into their overall strategies for planning urban growth patterns.

2.	**AGRICULTURE & FOREST RESOURCES.** **(In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.) In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.)** **Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**

(a)	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 nonagricultural 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 Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code 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 nonagricultural use or the conversion of forest land to non-forest use?	☐	☐	☐	☒

4.2.1 Impact Analysis

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 nonagricultural use?

No Impact. According to the Department of Conservation Farmland Mapping and Monitoring Program (FMMP), the Project site and surrounding area are considered Urban and Built-Up Land; therefore, the Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2024). Furthermore, the Project site is zoned R-1 and is not zoned for agricultural use. No impact would occur to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No further analysis is required.

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

No Impact. As stated above in impact a), the Project site is not located in an area designated for Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2024). The Project site is not located under a Williamson Act contract (DOC 2024). Because the Proposed Project would not conflict with existing agricultural zoning or a Williamson Act contract, no impact would occur. No further analysis is required.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. According to the City's Land Use Element Plan, no forest land, timberland, or timberland zoned Timberland Production occur within the City (City 2022). The Project site is zoned R-1 and would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Production. No impact would occur and no further analysis is required.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As stated above in impact c), the Project site does not contain forest land. The Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use; therefore, no impact would occur. No further analysis is required.

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 nonagricultural use or the conversion of forest land to non-forest use?

No Impact. As discussed in a) and c), the Project site is designated as Urban and Built-Up Land and does not contain agricultural or forest land (DOC 2024; City 2002).The Proposed Project would not involve changes in the existing environment that could result in conversion of Farmland to nonagricultural use or the conversion of forest land to non-forest use; therefore, no impact would occur. No further analysis is required.

Issues Requiring Further Study: There are no issues in this section requiring further study.

4.3 AIR QUALITY

This section describes the existing air quality setting and potential effects from Proposed Project implementation on the site and its surrounding area.

The Project site is located in the City of Laguna Beach in south Orange County, which is part of the South Coast Air Basin (SCAB). The SCAB includes all of Orange County, as well as the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAB is located on a coastal plain connecting broad valleys and low hills to the east. Regionally, the SCAB is bounded by the Pacific Ocean to the southwest and high mountains to the east forming the inland perimeter. The Project site is located toward the northeast portion of the SCAB near the foot of the San Bernardino Mountains, which define the eastern boundary of the SCAB.

3.	**AIR QUALITY. (Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.) Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
(b)	Violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?	☒	☐	☐	☐
(c)	Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
(d)	Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?	☒	☐	☐	☐

4.3.1 Impact Analysis

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

Potentially Significant Impact. CEQA requires a discussion of any inconsistencies between a Proposed Project and applicable general plans, specific plans, and regional plans (CEQA Guidelines Section 15125). The regional plan that applies to the Proposed Project includes the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). At this stage, it is unknown whether the Project would conflict with or obstruct implementation of the AQMP, as data acquisition and further analysis is required. An air quality study will be conducted as part of the EIR to determine whether the Project could result in any inconsistencies with the AQMP. This issue will be fully analyzed in the EIR.

b) Would the project violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?

Potentially Significant Impact. Implementation of the Proposed Project could potentially result in air quality impacts during project construction and operation. Construction phase air quality impacts would potentially include emissions from construction exhaust and travel, demolition and earth-moving activities, architectural coatings, and asphalt paving. Operational air quality impacts would potentially include emissions from project generated vehicle traffic and from on-site sources. However, at this time, the extent of these emissions and whether they would exceed applicable air quality standards is unknown. An air quality study will be conducted to assess whether the Project would contribute to an existing or projected air quality violation. This impact will be fully analyzed in the EIR.

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

Potentially Significant Impact. Sensitive receptors are generally defined as facilities that house or attract groups of children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollution. Schools, hospitals, residential areas, and convalescent facilities are examples of sensitive receptors. The closest sensitive receptors are homes located immediately adjacent to the Project site.

The Proposed Project may potentially result in short-term construction and permanent operational air pollutant emissions of particulate matter, carbon monoxide, reactive organic gases, oxides of nitrogen, and toxic air contaminants. At this time, the extent to which the Project may generate pollutant concentrations that could affect these receptors is unknown. An air quality study will be conducted to assess potential exposure risks, and this issue will be fully analyzed in the EIR.

d) Would the project result in substantial emissions (such as odors or dust) affecting a substantial number of people?

Potentially Significant Impact. Individual responses to odor or dust emissions are highly variable and can result in a variety of effects. Generally, the impacts from odor or dust emissions result from a variety of factors such as frequency, intensity, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to emissions. The intensity refers to an individual's or a group's perception of the odor or dust emissions strength or concentration. The duration of the emissions refers to the elapsed time over which the emissions are experienced by individuals or groups. The offensiveness of the emissions is the subjective rating of the unpleasantness of the odor or dust. The location accounts for the distance between the source of the emission and the individuals or

groups affected by the emissions. Sensory perception refers to an individual's ability to detect and interpret the odor or dust, as well as their overall reaction to it.

Potential sources of odor and dust emissions during construction activities include demolition, dirt-moving operations, diesel equipment, and materials such as asphalt, paints, and solvents. The objectionable emissions that may be produced during the construction process would be temporary and would likely not be noticeable for extended periods of time beyond the Project site's boundaries. Odor and dust impacts would be short-term, limited to the duration of diesel equipment operation and the use of odor-producing materials. Any resulting effects would be brief and localized to nearby residences.

However, the extent to which construction and operational emissions may affect surrounding areas is not yet determined. The potential for substantial odor or dust emissions will be evaluated in the air quality study. This issue will be fully analyzed in the EIR to determine whether the Project would result in any significant impacts.

Issues Requiring Further Study. Impacts associated with sections a) - d) are deemed potentially significant and will be fully analyzed in the EIR.

4.4 BIOLOGICAL RESOURCES

Biological resources include habitats and vegetative communities, migratory corridors, plants, wildlife, fisheries, special status species (regulated by a law, regulation, or policy, such as threatened and endangered species), and waters of the United States.

In December of 2017, a Biological Technical Report was prepared by Glenn Lukos Associates in support of the Proposed Project. The report is included in Appendix A.

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 Game 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, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
(c)	Have a substantial adverse effect on state or federally protected wetlands as (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☒	☐	☐	☐

4.4.1 Impact Analysis

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

Less than Significant With Mitigation Incorporated. The Proposed Project consists of the construction of an 18.5 linear foot of road surface at the terminus of Juanita Way, which is located in a residential neighborhood. The Proposed Project would facilitate the construction of a single-family home. The Project is located on Lots 7 and 8, Block 14, Tract 26 of the City's Environmentally Sensitive Areas Map (City 1976). These lots are within the boundaries of "open space preserved areas."

According to the City's GIS map, the Proposed Project site is designated as an Environmentally Sensitive Area due to its classification under drainage, Open Space Preserve (OSP), High-Value Habitat (HVH), Fuel Modification Zone (FM), and High Fire Hazard Severity Zone (HFHSZ) (City 2025b).

According to the Biological Technical Report, there is no suitable habitat on-site that would support federal- or state-listed special status animal species (Appendix A). Some bird species, such as White-tailed kite (*Elanus leucurus*) may potentially utilize the site for forage, but due to lack of suitable habitat, nesting would not occur. Furthermore, no special status animal species were observed within the Project area during the site survey.

For plants, the California Department of Fish and Wildlife (CDFW) has adopted the California Rare Plant Ranks (CRPR) and recognizes that species ranked as Rank 1A, 1B, 2A, or 2B of the CNPS Inventory of Rare and Endangered Plants in California may meet the criteria for listing and should be considered under CEQA. The Project site survey and a review of the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) indicated that there no federal- or state-listed special statues plant species occur within the Project area due to lack of suitable habitat. However, two species – Fish's milkwort (*Polygala cornuta var. fishae*) and Nuttall's scrub oak (*Quercus dumosa*) have potential to occur within the Project area and are ranked 4.3 and 1B.1, respectively, by the CRPR. According to the CRPR, Fish's milkwort's rank indicates that the species has a limited distribution but is not very endangered in

California. The Nuttall's scrub oak's rank indicates that the species is seriously endangered in California and other places.

In summary, the total Project area subject to and vegetation/land use types impacted by construction and fuel modification covers 0.184 acres. Impacts to lemonade berry covers approximately 0.133 acre. Impacts to toyon total approximately 0.005 acre. Proposed impacts to giant wildrye total approximately 0.002 acre. Portions of the lemonade berry, toyon, and giant wildrye occur within areas mapped as high value habitat as depicted on Exhibit 3 of the Biological Technical Report. While fuel modification activities will result in the thinning of the vegetation canopy, fuel modification activities will not result in impacts to special-status plants or native shrubs that are identified as providing habitat conditions required by special-status species. Therefore, with the mitigation measure (MM) BIO-1 implemented, fuel modification activities will not result in significant impacts to special-status species.

MM BIO-1 To avoid impacts to nesting and migratory birds, any removal or clearing of vegetation shall be conducted outside of the breeding season, which extends from February 1 to August 31. If seasonal conditions promote a high risk for wildfires, work may occur during the breeding season if a qualified biologist conducts a survey for nesting birds within 48 hours prior to the commencement of fuel modification activities in the area, and ensures that no active nests are affected.

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 Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact. The Proposed Project consists of the construction of an 18.5 linear foot of road surface at the terminus of Juanita Way, which is located in a residential neighborhood. The Proposed Project would facilitate the construction of a single-family home. The Project is located on Lots 7 and 8, Block 14, Tract 26 of the City's Environmentally Sensitive Areas Map (City 1976). These lots are within the boundaries of "open space preserved areas."

According to the City's GIS map, the Proposed Project site is designated as an Environmentally Sensitive Area due to its classification under drainage, Open Space Preserve (OSP), High-Value Habitat (HVH), Fuel Modification Zone (FM), and High Fire Hazard Severity Zone (HFHSZ) (City 2025b).

According to the Biological Technical Report, the Project area does not contain any special-status habitats listed by CNNDB (Appendix A). However, portions of Project area are designated by the City of Laguna Beach as "High Value Habitat" (Appendix A). Specifically, the Sumac-Toyon Southern Mixed habitat with lemonade berry, toyon, fuel modification/disturbed areas, and giant wildrye, is within the high value habitat area and will be impacted.

The Proposed Project would disturb a previously undisturbed area that is identified as an Environmentally Sensitive Habitat Area (ESHA). Therefore, the Project has the potential to impact sensitive natural community identified in a local plan. This impact will be fully analyzed in the EIR.

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?

Less than Significant Impact. The Proposed Project consists of the construction of an 18.5 linear foot of road surface at the terminus of Juanita Way, which is located in a residential neighborhood. The Proposed Project would facilitate the construction of a single-family home. The Project is located on Lots 7 and 8, Block 14, Tract 26 of the City's Environmentally Sensitive Areas Map (City 1976). These lots are within the boundaries of "open space preserved areas."

According to the City's GIS map, the Proposed Project site is designated as an Environmentally Sensitive Area due to its classification under drainage, Open Space Preserve (OSP), High-Value Habitat (HVH), Fuel Modification Zone (FM), and High Fire Hazard Severity Zone (HFHSZ) (City 2025b).

The Proposed Project would disturb a previously undisturbed area that is identified as an Environmentally Sensitive Habitat Area (ESHA). However, according to the Biological Technical Report, two significant drainage courses and their associated tributaries occur adjacent to the proposed fuel modification area, but will be entirely avoided. Thus, the Project impacts on state or federally protected wetlands would be less than significant.

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?

Less than Significant with Mitigation Incorporated. The Proposed Project consists of the construction of an 18.5 linear foot of road surface at the terminus of Juanita Way, which is located in a residential neighborhood. The Proposed Project would facilitate the construction of a single-family home. The Project is located on Lots 7 and 8, Block 14, Tract 26 of the City's Environmentally Sensitive Areas Map (City 1976). These lots are within the boundaries of "open space preserved areas."

According to the City's GIS map, the Proposed Project site is designated as an Environmentally Sensitive Area due to its classification under drainage, Open Space Preserve (OSP), High-Value Habitat (HVH), Fuel Modification Zone (FM), and High Fire Hazard Severity Zone (HFHSZ) (City 2025b).

The Proposed Project would disturb a previously undisturbed area that is identified as an Environmentally Sensitive Habitat Area (ESHA). There is no direct connection of open space from the Project site to the Pacific Ocean. Although this open space area is surrounded by residential development, it is loosely connected to the open space area of Aliso and Wood Canyons Wilderness Park to the east.

According to the Biological Technical Report, areas to the north of the Project Site supports limited wildlife movement as a result of steep topography and surrounding existing development. Species observed utilizing or moving through the site included raccoon (*Procyon lotor*) [tracks], coyote (*Canis latrans*) [tracks and scat], and mule deer (*Odocoileus hemionus*). Movement on the site appears to be limited to low-lying canyon bottoms and is not likely to occur in residential development. Additionally, movement to and from the site to adjacent open space areas is inhibited by dense, existing residential development and the associated roads. Very limited potential exists for wildlife movement into the site from the adjacent open space, however, due to the insularity of the site, it does not function as a wildlife corridor. As such, wildlife movement would not be significantly affected by proposed fuel modification activities.

Furthermore, with implementation of MM BIO-1, which restricts vegetation removal during the breeding season unless pre-clearing nesting bird surveys are conducted by a qualified biologist, potential impacts

to active nests would be avoided. Therefore, impacts would be less than significant with mitigation incorporated.

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

Potentially Significant Impact. The Proposed Project consists of the construction of an 18.5 linear foot of road surface at the terminus of Juanita Way, which is located in a residential neighborhood. The Proposed Project would facilitate the construction of a single-family home. The Project is located on Lots 7 and 8, Block 14, Tract 26 of the City's Environmentally Sensitive Areas Map (City 1976). These lots are within the boundaries of "open space preserved areas."

According to the City's GIS map, the Proposed Project site is designated as an Environmentally Sensitive Area due to its classification under drainage, Open Space Preserve (OSP), High-Value Habitat (HVH), Fuel Modification Zone (FM), and High Fire Hazard Severity Zone (HFHSZ) (City 2025b).

The Proposed Project would disturb a previously undisturbed area that is identified as an Environmentally Sensitive Habitat Area (ESHA). As these areas may contain biological resources protected by local policies or ordinances, the Proposed Project has the potential to conflict with these protections. This impact will be fully analyzed in the EIR.

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

Potentially Significant Impact. The Proposed Project consists of the construction of an 18.5 linear foot of road surface at the terminus of Juanita Way, which is located in a residential neighborhood. The Proposed Project would facilitate the construction of a single-family home. The Project is located on Lots 7 and 8, Block 14, Tract 26 of the City's Environmentally Sensitive Areas Map (City 1976). These lots are within the boundaries of "open space preserved areas."

According to the City's GIS map, the Proposed Project site is designated as an Environmentally Sensitive Area due to its classification under drainage, Open Space Preserve (OSP), High-Value Habitat (HVH), Fuel Modification Zone (FM), and High Fire Hazard Severity Zone (HFHSZ) (City 2025b).

The Proposed Project would disturb a previously undisturbed area that is identified as an Environmentally Sensitive Habitat Area (ESHA). As these areas may be subject to habitat conservation plans, the Proposed Project could potentially conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plans. This impact will be fully analyzed in the EIR.

Issues Requiring Further Study. Impacts associated with sections b), e) and f) are deemed potentially significant and will be fully analyzed in the EIR.

4.5 CULTURAL RESOURCES

Cultural resources include archaeological and paleontological artifacts such as human remains, geologic features, historical buildings and structures, and Native American remains and artifacts. CEQA defines cultural resources as:

- Resources listed in, or determined to be eligible by, the State Historical Resources Commission for listing in the California Register of Historical Resources (Public Resources Code [PRC] 5024.0, Title 14 California Code of Regulations [CCR], Section 4850 et seq.)

- Resources included in a local register of historical resources, as defined in section 5020.1(k) of the PRC or identified in a historical resource survey meeting the requirements of section 5024.1(g) of the PRC, will be presumed to be historically or culturally significant. Public Agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant; and

- Any object, building structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC 5024.1, Title 14 CCR, Section 4852).

Impacts to cultural resources include physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The Secretary of the Interior's Standards for Rehabilitation (Standards) are codified at 36 Code of Federal Regulations (CFR) Section 67.7. In most circumstances, the Standards are relevant in assessing whether a substantial adverse change under CEQA would occur. Section 15064.5b(3) of the CEQA Guidelines states in part that "…a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historic resource," and therefore may be considered categorically exempt.

5.	**CULTURAL RESOURCES. Would the project:**	**Potentially Significant Impact**	**Less than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
(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 dedicated cemeteries?	☒	☐	☐	☐

4.5.1 Impact Analysis

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

Potentially Significant Impact. The Proposed Project involves ground-disturbing activities, which have the potential to affect historical resources. As a result, there is a potential for a substantial adverse change in the significance of a historical resource pursuant to §15064.5. However, at this time, it is unknown whether historical resources are present within the Project site. A cultural resources study will be conducted to determine the presence or absence of historical resources and assess potential impacts. The results of this study and potential impacts will be analyzed in the EIR.

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

Potentially Significant Impact. The Proposed Project involves ground-disturbing activities on a currently undeveloped, vacant site. Such activities could potentially affect unrecorded and unknown archeological resources. At this time, the presence or significance of such resources is unknown. A cultural resources study will be conducted to determine the presence or absence of archaeological resources and assess potential impacts. The results of this study and potential impacts will be analyzed in the EIR.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Potentially Significant Impact. The Proposed Project involves ground-disturbing activities on a currently undeveloped, vacant site. Such activities could potentially result in disturbance of human remains. The potential for encountering human remains is currently unknown. A cultural resources study will be conducted to determine the presence or absence of human remains and assess potential impacts. The results of this study and potential impacts will be analyzed in the EIR.

Issues Requiring Further Study. Impacts associated with sections a) - c) are deemed potentially significant and will be fully analyzed in the EIR.

4.6 ENERGY

This section describes the potential energy resources impacts from implementation of the Proposed Project.

Energy conservation management in the state was initiated by the 1974 Warren-Alquist State Energy Resources Conservation and Development Act that created the California Energy Resource Conservation and Development Commission (currently named California Energy Commission [CEC]), which was originally tasked with certifying new electric generating plants based on the need for the plant and the suitability of the site of the plant. In 1976 the Warren-Alquist Act was expanded to include new restrictions on nuclear generating plants that effectively resulted in a moratorium of any new nuclear generating plants in the state. The following lists specific regulations adopted by the State to reduce the consumption of energy.

- CCR Title 20 – Regulations for appliance efficiency standards

- CCR Title 24 Part 6 – Energy efficiency standards for residential and nonresidential buildings
- CCR Title 24 Part 11 – CalGreen Building Standards
- Senate Bill (SB) 100 – Regulations for retail sales of electricity
- Executive Order (EO) N-79-20 – Requires all new passenger vehicles and trucks to be zero-emission by the year 2035
- Assembly Bill (AB) 1109 – Requires the use of high-efficiency lighting in new structures

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

4.6.1 Impact Analysis

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

Potentially Significant Impact. The Proposed Project would facilitate the construction of a single-family home, which could potentially result in a significant impact to energy resources due to use of energy for construction and operations. At this time, a detailed assessment of energy use has not been conducted, and it is unknown whether energy consumption would be considered wasteful, inefficient, or unnecessary. An energy study will be conducted to determine potential impacts. The EIR will provide further analysis to determine if the Project would result in significant impacts related to energy use.

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

Potentially Significant Impact. The Proposed Project could potentially conflict with or obstruct a state or local plan for renewable energy or energy efficiency due to use of energy for construction and operations. At this time, it is unknown whether the Project would conflict with or obstruct any state or local plans related to renewable energy or energy efficiency. An energy study will be conducted to determine potential impacts. The EIR will provide further analysis to determine if the Project would result in significant impacts related to energy use.

Issues Requiring Further Study. Impacts associated with sections a) - b) are deemed potentially significant and will be fully analyzed in the EIR.

4.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) 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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	ii)Strong seismic ground shaking?	☐	☐	☒	☐
	iii)Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	iv)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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
(d)	Be located on expansive soil, as defined in Table 18-1-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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

4.7.1 Impact Analysis

a)i) 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? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for

human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). Although the Project site is located in a seismically active region of Southern California, according to the Department of Conservation's California Geological Survey (CGS), the Project site is not located within an Alquist-Priolo Fault Zone (CGS 2024a). Therefore, impacts would be less than significant. No further analysis is required.

ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. The Project site is located in a seismically active region of Southern California. The closest fault to the Project site is the Newport-Inglewood Fault Zone, located approximately 3.0 miles southwest. Although the rupture of this fault could result in seismic ground shaking, the Project site, as stated above, is not located in an Alquist-Priolo Earthquake Fault Zone. Additionally, the Proposed Project would comply with the latest California Building Code (CBC) seismic design standards.

The City has adopted the CBC (LBMC Chapter 14.50), with amendments, which prescribes regulations for the erection, construction, enlargement, repair, improving, removal, conversion, demolition, occupancy, equipment, use, height, area and maintenance of all buildings and structures. Per Section 22.10.010 of the LBMC, the Project would require a grading permit prior to construction. The grading permit process ensures that site preparation, including earthwork and slope stability, complies with applicable seismic safety standards as established in the California Building Code and supported by site-specific geotechnical investigations.

Construction of the Proposed Project would comply in accordance with all applicable City standards and requirements. Therefore, compliance with the City's established regulatory framework and standard engineering practices and design criteria, which would be verified through the City's development review process, would ensure potential impacts associated with strong seismic shaking at the Project site would be less than significant. No further analysis is required.

iii) 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?

Less Than Significant Impact. Liquefaction is a phenomenon where earthquake-induced ground vibrations increase the pore pressure in saturated, granular soils until it is equal to the confining, overburden pressure. The Project site is not mapped as being within an area where liquefaction is likely to occur (CGS 2024a). Additionally, the Geotechnical Report states that the Project is not located within a zone of required investigation for liquefaction (Geofirm 2017).

According to the report, the Project site is underlain at shallow depth by bedrock strata of the San Onofre Formation. The bedrock is mantled by residual soil consisting of dark brown sandy silt and clay. Based on the Geotechnical Report's observations, the bedrock is suitable in its present form for support of improvements (Geofirm 2017). No evidence of groundwater activity was noted during the field exploration conducted as part of the Geotechnical Report. The report notes that the potential for seismically induced settlement to occur is considered remote for bedrock sites, such as the Project site.

The City has adopted the CBC (LBMC Chapter 14.50), with amendments, which prescribes regulations for the erection, construction, enlargement, repair, improving, removal, conversion, demolition, occupancy,

equipment, use, height, area and maintenance of all buildings and structures. Per Section 22.10.010 of the LBMC, the Project would require a grading permit prior to construction. The grading permit process ensures that site preparation, including earthwork and slope stability, complies with applicable seismic safety standards as established in the California Building Code and supported by site-specific geotechnical investigations. Construction of the Proposed Project would comply in accordance with all applicable City standards and requirements. Therefore, compliance with the City's established regulatory framework and standard engineering practices and design criteria, which would be verified through the City's development review process, would ensure potential impacts associated with seismic-related ground failure at the Project site would be less than significant. No further analysis is required.

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

Less Than Significant Impact. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. According to the California Geological Survey, a portion of the Project site's parcel (APN 656-131-04) lies within a landslide zone. However, the entire Project area lies outside of this landslide zone (CGS 2024a).

The City has adopted CBC (LBMC Chapter 14.50), with amendments, which includes standards related to soils and foundations, structural design, building materials, and structural testing and inspections to minimize potential geologic hazards. LBMC Chapter 14.78, *Geology Report,* prescribes parameters and requirements for the preparation and contents of geology reports within the City in order to protect life and property. The Project would be required to comply with the applicable regulations to the CBC, which would reduce potential impacts associated with geological hazards such as landslides. Construction of the Proposed Project would be done in accordance with all applicable City standards and requirements, thus reducing impacts less than significant levels. No further analysis is required.

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

Less Than Significant Impact. The Proposed Project would expose soil to potential short-term erosion by wind and water during construction activities. According to the Geotechnical Report, the existing surface runoff is generally uncontrolled. The Proposed Project operations would modify surficial discharge, which the report recommended to be controlled and conducted offsite by appropriate civil engineering design to preclude potential soil saturation, erosion, and runoff onto the adjoining properties (Geofirm 2017).

Furthermore, the Proposed Project would be required to comply with water quality measures included in LBMC Title 16, *Water Quality Control*, requiring preparation of a Construction Best Management Practices Plan (CBMPP) or equivalent erosion and sediment control plan, which includes measures such as silt fences, straw wattles, stabilized construction entrances, and storm drain inlet protection. Chapter 22.17 of the LBMC requires implementation and maintenance of erosion and sediment control devices during all phases of construction. Additionally, the Project must adhere to the requirements of LBMC Chapter 14.78, *Geology Report*, which includes guidelines for evaluating the erodibility of the site and adjacent areas. Project-specific design features, such as landscaping and drainage design, will minimize erosion both during and after construction. Compliance with these regulations, collectively, will ensure that impacts related to soil erosion and topsoil loss are reduced to less than significant levels. No further analysis is required.

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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As stated above in impact a)iii) and a)iv), the Project site is not located in an area defined by the Department of Conservation California Geological Survey to be at risk for liquefaction and landslides. Lateral spreading is the horizontal movement or spreading of soil toward an open face. Lateral spreading may occur when soil liquefied during an earthquake event, and the liquefied soils with overlying souls move laterally to unconfined spaces. Subsidence sits the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities, which include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydro compaction.

Since liquefaction is not considered a hazard at the Project site, earthquake-induced lateral spreading would also not be a hazard at the Project site. Additionally, Proposed operations of the expanded road and residential single-family home would not include activities known to cause subsidence, such as groundwater or oil extraction. The Proposed Project would be required to comply with the CBC, as adopted by the LBMC Chapter 14.50. Additionally, LBMC Chapter 14.78*, Geology Report*, prescribes parameters and requirements for the preparation and contents of geology reports within the City in order to safeguard life and property. Therefore, compliance with the City's established regulatory framework and standard engineering practices and design criteria would ensure potential impacts associated with a geologic unit or soil that is unstable or would become unstable at the Project site, would be less than significant. No further analysis is required.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are defined as soils possessing clay particles that react to moisture changes by shrinking (when dry) or swelling (when wet). As discussed in part a), the Project site is not considered to be within a zone of potentially liquefiable soils (CGS 2024a). Testing of on-site samples indicates soils have a low expansion, and contain negligible concentration of soluble sulfates. According to the USDA Web Soil Survey, the Project site area is comprised of soper gravelly loam, which is not considered an expansive soil (USDA 2025).

The Proposed Project would be required to comply with the CBC, as adopted by the LBMC Chapter 14.50. The Proposed Project would not be located on expansive soil, thus would not directly or indirectly increase risk to life or property. Impacts would be less than significant. No further analysis is required.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Proposed Project does not propose the installation of septic tanks or connections to alternative wastewater systems. Therefore, no impact would occur. No further analysis is required.

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

Potentially Significant Impact. According to the Geotechnical Report, the Proposed Project lies on San Onofre Breccia bedrock (also known as Tsob) (Geofirm 2017). Previous archeological discoveries from this geological material have included fossil remains of nearshore foraminiferans, bivalve mollusks, reptiles, and mammals (Stuart 1979). Although this geologic material has only yielded sparse fossil remains, these previous discoveries of vertebrae fossils indicate the likely potential for additional discoveries. The paleontological sensitivity of this material is moderate. Because the project will disturb soils, there is potential to encounter a paleontological resource. Impacts are potentially significant. This impact will be fully analyzed in the EIR.

Issues Requiring Further Study: Impacts associated with section f) are deemed potentially significant and will be fully analyzed in the EIR.

4.8 GREENHOUSE GAS EMISSIONS

This section describes the potential global climate change effects from implementation of the Proposed Project.

The City is in the process of developing a Climate Action and Adaptation Plan (CAAP) with PlaceWorks. The CAAP will include strategies to reduce greenhouse gas (GHG) emissions and adapt to climate change-related hazards. The GHG emissions reduction component will address emissions from community-wide activities and municipal government operations. A draft of the Community-wide and Municipal Operations GHG Emissions – Results for 2018, 2021, 2030, and 2045 has been prepared (City 2024c). The report details that the next steps include working with City staff to determine appropriate targets for reducing GHG emissions from community-wide activities and government operations. PlaceWorks will quantify the GHG-reduction benefits from existing and planned State activities, including relevant laws and regulations, through 2045, to determine initial progress towards achieving the targets. The results of the forecast and quantification of existing local and State reduction activities will inform GHG reduction policies in the CAAP.

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☒	☐	☐	☐

4.8.1 Impact Analysis

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. The Proposed Project is expected to generate GHG emissions during construction and operational activities. At this time, it is unknown whether these emissions would exceed

applicable thresholds or result in a significant impact. A GHG study will be conducted to assess potential impacts. This impact will be fully analyzed in the EIR.

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. As stated in a), the Proposed Project may potentially have impacts associated with GHG emissions during construction and operations. At this time, it is unknown whether the Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. A GHG study will be conducted to assess potential impacts. This potentially significant impact will be further analyzed in the EIR.

Issues Requiring Further Study. Impact associated with sections a) and b) are deemed potentially significant and will be further analyzed in the EIR.

4.9 HAZARDS AND HAZARDOUS MATERIALS

The Project site was analyzed to determine the potential for hazards or hazardous materials to occur on-site. Background research included an evaluation of the Geotracker and EnviroStor databases, operated by the State Water Resources Control Board (SWRCB) and the Department of Toxic Substances Control (DTSC).

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
(d)	Be located on a site which is included on a list of hazardous materials 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 within an airport land use plan or, where such a plan had not been adopted, within 2 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?	☒	☐	☐	☐

4.9.1 Impact Analysis

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

Less Than Significant Impact. The exposure of persons to hazardous materials can occur from improper handling or use of hazardous materials or hazardous waste during construction or operation of future development, particularly by untrained personnel, an accident during transport, environmentally unsound disposal methods, or fire, explosion or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous materials or waste present, and the proximity of sensitive receptors.

Construction activities associated with the Proposed Project include grading and the construction of an 18.5 linear foot of road surface at the terminus of Juanita Way. The proposed street access would facilitate the creation of a new building site and the potential development of a single-family residence at 2400 Juanita Way. The Proposed Project would involve the use of heavy equipment during construction that would emit emissions associated with internal combustion engines, (i.e., diesel and gasoline). Hazardous materials that are used during construction (e.g., petroleum-based products, paints, solvents, sealers, and asphalt) for a short period of time would be transported, used, stored, and disposed of according to local, County, state, and federal regulations. Once operational, the Proposed Project would only use chemicals associated with maintenance operations including the use of commercial cleansers, lubricants, solvents, and paints, among other things typically used in residential facilities. Maintenance materials would not be acutely hazardous and would be used in limited quantities at the Proposed Project site. Therefore, impacts would be less than significant. No further analysis is required.

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?

Less Than Significant Impact. As previously stated in a) above, construction activities would involve the use of chemical agents, oils, solvents, paints, and other hazardous materials that are typical at such construction sites. While typical household hazardous materials (e.g., paints, cleaning agents, fertilizers) would be present during operations, they would be consistent with existing residential uses in the area. No industrial or large-scale hazardous material storage is proposed. Construction and operational activities would be required to adhere to local standards set forth by the City, as well as state and federal health and safety requirements that are intended to minimize risk to the public from hazardous materials, such as California Division of Occupational Safety and Health (Cal/OSHA) requirements, the Hazardous Waste Control Act, the California Accidental Release Prevention (CalARP) Program, and the California Health and Safety Code. The Project would have a less than significant impact associated with creating significant hazards to the public or the environment through foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No further analysis is required.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The Project site is not located within 0.25-mile of an existing or proposed school. The closest school to the Project site is Laguna Beach High School, which is located approximately one mile northwest of the Project site. Therefore, the Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur. No further analysis is required.

d) Would the project be located on a site which is included on a list of hazardous materials 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?

No Impact. The Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (SWRCB 2024; DTSC 2024). Therefore, implementation of the proposed Project would not result in an impact associated with known hazardous materials sites. No further analysis is required.

e) For a project located within an airport land use plan or, where such a plan had not been adopted, within 2 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?

No Impact. The Project site is not located within an airport land use plan, nor is the Project site located within two miles of a public airport or public use airport. The closest airport to the Project site is John Wayne Airport, located approximately 11 miles northwest of the site. Therefore, the Proposed Project would not result in a safety hazard or excessive noise for people residing or working in the Project area; no impact would occur. No further analysis is required.

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

Potentially Significant Impact. The City has adopted a Local Hazard Mitigation Plan (LHMP), Wildfire Mitigation and Fire Safety Report, and an evacuation plan. The LHMP was approved by Federal Emergency Management Agency (FEMA) and adopted by the Laguna Beach City Council in August of 2018.

Access to the Project site is provided via SR-1, located southwest of the Project site. Local access to the Project site is provided from Juanita Way. Within the Project area, Solana Way to Alta Vista Way provide access to Juanita Way. According to the City of Laguna Beach Evacuation Management Zone map, the closest evacuation route to the Project site is Alta Vista Way (City 2019a). The Project site is at the terminus of Juanita Way, thus construction would not block evacuation routes. While the Proposed Project may introduce temporary traffic delays during construction with vehicles entering and exiting the site, these incidents are limited during the construction phase and would not result in road closures.

The Project site is not located within or near a fire hazard severity zone in state responsibility area (CalFire 2024). However, the Project site is identified as being within a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (City 2024a). Due to the sensitivity of the area and its identification within an LRA, this impact will be fully analyzed in the EIR.

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

Potentially Significant Impact. The Proposed Project consists of the construction of an 18.5 linear foot of road surface at the terminus of Juanita Way, which is located in a residential neighborhood. The Project site is located on a Fuel Modification Zone that is currently in development (City 2025a). A fuel modification zone is an area of land where combustible vegetation is removed and/or modified and partially or totally replaced with more adequately spaced, drought-tolerant, fire-resistant plants in order to provide a reasonable level of protection to structures from a wildland fire. Development contiguous to or within an undeveloped vegetated area (wildland urban interface) requires modification of natural vegetation at the urban interface and an integrated landscape plan (City 2019b).

Per City requirements, a licensed architect shall prepare a Landscape/Fuel Modification Plan (LFMP) for the Proposed Project compliant with the LBFD Landscape/Fuel Modification Standards and Maintenance Program. This shall occur prior to issuance of the building permit.

Given the sensitivity to the area in regard to wildland fires and City-required design specifications for such projects, impacts would be potentially significant. This impact will be fully analyzed in the EIR.

Issues Requiring Further Study: Issues Impacts associated with section f) and g) are deemed potentially significant and will be fully analyzed in the EIR.

4.10 HYDROLOGY AND WATER QUALITY

Hydrology is the study of the movement, distribution, and quality of water throughout the Earth, and thus addresses both the hydrologic cycle and water resources. Water quality is the physical, chemical, and biological characteristics of water, characterized through the methods of hydrometry. The primary bases for such characterization are parameters which relate to drinking water, safety of human contact, and the health of ecosystems.

A seiche is a standing wave in an enclosed or partially enclosed body of water. A tsunami is a series of waves created when a body of water, such as an ocean, is rapidly displaced. A mudflow or mudslide is the most rapid (up to 80 kilometers per hour) and fluid type of downhill mass wasting.

An Off-Site Hydrology Study was prepared for the Proposed Project on September 21st, 2023 by Total Engineering, Inc.

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☒	☐

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	☐	☐	☒	☐
	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?	☐	☐	☐	☒

4.10.1 Impact Analysis

a) Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Project-related construction activities would include grading activities and construction of the driveway, proposed residential structure, and associated improvements. Construction activities have the potential to temporarily alter the existing drainage patterns of the Project site. Soil disturbance would temporarily occur during Project construction due to grading activities. Disturbed soils would be susceptible to increased rates of erosion from wind and water and could produce polluted runoff or degrade surface and/or ground water quality. According to the Geotechnical Report, groundwater during the subsurface investigation was not encountered (Geofirm 2017). Existing surface runoff is generally uncontrolled and Proposed site improvements will modify surficial discharge.

The Project would be required to comply with LBMC Chapter 16.01, *Water Quality Control*, including Section 16.01.040, Control of Urban Runoff, which states that prior to issuance of a grading permit, building permit, or coastal development permit, the community development department shall review project plans and impose Best Management Practices (BMPs), terms, conditions and requirements on the project to ensure that pollutant discharges are prevented, reduced, or removed to the extent practicable. This would include, but is not limited to, implementation of erosion-control and sediment-control BMPs to control potential construction-related pollutants.

Regarding operational impacts, the existing catch basin at the Project site will be relocated and will connect to the existing 16-inch diameter storm drainpipe. The drainage pattern of the Proposed Project site and surrounding area is well established. According to LBMC 16.01.020, the Project site is located on

a "priority development area" due to its location on a hillside with greater than 25% slope. Under LBMC 16.01.050, all priority development projects shall prepare a water quality/urban runoff management plan (WQMP), which shall include proposed source control, site design, structural treatment control BMPs, and hydromodification controls as specified in the NPDES/MS4 permit, and the WQMP shall be prepared in conformance with the Jurisdictional Urban Runoff Management Program/Local Implementation Plan (JURMP/LIP).

In compliance with these ordinances and requirements, the Proposed Project would not violate any water quality standards or discharge requirements and would not result in a significant reduction of groundwater quality. Impacts would be less than significant. No further analysis is required.

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?

Less Than Significant Impact. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. The Proposed Project would increase impervious area in the proposed condition.

According to the Geotechnical Report, the Project site is underlain at shallow depth by competent sandstone bedrock strata of the San Onofre Formation (Geofirm 2017). The bedrock is overlain by a thin overburden of residual soils and fill. The Geotechnical Report indicates that the Project site is geotechnically unsuitable for the on-site discharge and/or infiltration of stormwater due to the potential for adverse perching of groundwater on shallow impermeable bedrock. No groundwater was encountered during the subsurface investigation and groundwater is not considered a design constraint. Additionally, as indicated in the Hydrology Study, the Project site is primarily comprised of Hydrologic Soil Group Type C soils that are moderate for on-site infiltration and while surficial infiltration is possible, it is not feasible due to the steep slope (Total 2023). The Proposed Project would not introduce new uses or pollutants to the area. Neither the construction, nor operation of the Proposed Project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge. As such, the Proposed Project would result in a less than significant impact. No further analysis is required.

c) 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:

i) result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Project-related construction activities would include grading activities and construction of the driveway, proposed residential structure, and associated improvements. Construction activities have the potential to temporarily alter the existing drainage patterns of the Project site. The Project would be required to comply with LBMC Chapter 16.01, *Water Quality Control*, including Section 16.01.040, Control of Urban Runoff, which states that prior to issuance of a grading permit, building permit, or Coastal Development Permit, the community development department shall review project plans and impose BMPs, terms, conditions and requirements on the project to ensure that pollutant discharges are prevented, reduced, or removed to the extent practicable. According to LBMC Section 25.05.040, all grading activities must comply with the city's grading ordinance, which includes

requirements for erosion control. LBMC Section 22.10.050 mandates the use of best management practices (BMPs) to prevent erosion and sedimentation for the Proposed Project.

The existing catch basin at the Project site will be relocated and will connect to the existing 16-inch diameter storm drainpipe. The drainage pattern of the Proposed Project site and surrounding area is well established. Development of a catch basin and compliance with relevant local regulations would result in less than significant impacts associated with the existing drainage pattern. No further analysis is required.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. Project-related construction activities would include grading activities and construction of the driveway, proposed residential structure, and associated improvements. Construction activities have the potential to temporarily alter the existing drainage patterns of the Project site. The Project would be required to comply with LBMC Chapter 16.01, *Water Quality Control*, including Section 16.01.040, Control of Urban Runoff, which states that prior to issuance of a grading permit, building permit, or Coastal Development Permit, the community development department shall review project plans and impose BMPs, terms, conditions and requirements on the project to ensure that pollutant discharges are prevented, reduced, or removed to the extent practicable. As such, Project related construction activities would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

The Proposed Project would not create or contribute surface runoff volume that would exceed the capacity of the existing stormwater drainage systems. According to the Hydrology Report prepared for the Proposed Project, to protect the proposed residential improvements at the subject property, grade and cross-slope must be sufficient to contain the flow within the street section, and the catch basin opening must be wider than the top width of the flow (Total 2023). The existing catch basin at the Project site will be relocated and will connect to the existing 16-inch diameter storm drainpipe. Compliance with relevant municipal codes and relocation of the catch basin will make impacts relating to surface runoff less than significant. No further analysis is required.

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff?

Less Than Significant Impact. Project-related construction activities would include grading activities and construction of the driveway, proposed residential structure, and associated improvements. Construction activities have the potential to temporarily alter the existing drainage patterns of the Project site. The Project would be required to comply with LBMC Chapter 16.01, *Water Quality Control*, including Section 16.01.040, Control of Urban Runoff, which states that prior to issuance of a grading permit, building permit, or Coastal Development Permit, the community development department shall review project plans and impose BMPs, terms, conditions and requirements on the project to ensure that pollutant discharges are prevented, reduced, or removed to the extent practicable. Therefore, implementation of the Proposed Project would result in a less than significant impact associated with stormwater drainage from construction activities. No further analysis is required.

iv) impede or redirect flood flows?

Less Than Significant Impact. The Proposed Project is not located within a FEMA-identified 100-year flood hazard area (FEMA 2024). Additionally, the Project site is designated as Zone X on FEMA's National Flood Hazard Layer Viewer, which means that the site is an area of minimum flood hazard. Therefore, implementation of the Proposed Project would not result in a significant impact associated with redirecting flood flows in a flood hazard area (FEMA 2024). No further analysis is required.

d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. Tsunamis are sea waves that are generated in response to large-magnitude earthquakes, which can result in coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. The Project site is not located within a flood hazard, tsunami, or seiche zone (CGS 2024b). Therefore, no impacts associated with risk of pollutants due to project inundation would occur. No further analysis is required.

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

No Impact. The Project site is not in a designated groundwater recharge area and based on geotechnical conditions, groundwater is not anticipated to be encountered during construction (Geofirm 2017). The Project would not introduce new uses or pollutants to the area, and water usage during Project operation is expected to be similar to existing conditions. The Project's implementation will be consistent with the General Plan land use and the zoning for the Project site. The Proposed Project would be within the population projections anticipated and planned for by the City's General Plan and would not increase growth beyond what was anticipated in the Laguna Beach County Water District (LBCWD) Urban Water Master Plan & Water Shortage Contingency Plan (UWMP).

Construction activities would adhere to local, State, and federal regulations regarding construction emissions to ensure water quality is not significantly degraded. As such, the Project would not conflict with any water quality control plans or sustainable groundwater management plans; less than significant impacts would occur. No further analysis is required.

Issues Requiring Further Study: No issues in this section require further study.

4.11 LAND USE AND PLANNING

Cities and counties "plan" in order to identify important community issues (such as new growth, housing needs, and environmental protection), project future demand for services (such as sewer, water, roads, etc.), anticipate potential problems (such as overloaded sewer facilities or crowded roads), and establish goals and policies for directing and managing growth. Local governments use a variety of tools in the planning process including the general plan, specific plans, zoning, and the subdivision ordinance.

The Project site is zoned R-1 and Open Space Preserve. The Project site has a General Plan land use designation of Village Low Density, which is intended to provide for single-family residential development and has been accounted for under General Plan build-out (City 2024a).

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☒	☐	☐	☐

4.11.1 Impact Analysis

a) Would the project physically divide an established community?

No Impact. The Project site is currently developed and is zoned R-1 and Open Space Conservation. The Proposed Project would not physically divide or separate the residential neighborhood within the surrounding area, as development of the proposed road extension would result in a continuation of residential uses that occur within the surrounding area. Therefore, no impact would occur. No further analysis is required.

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?

Potentially Significant Impact. The Proposed Project could potentially conflict with the following land use policies, as defined in the City's General Plan Land Use Element (City 2022):

- Land Use Element Policy 2.7: Evaluate the impact of proposed development on hillsides and along ridgelines require building design, location, and arrangement to avoid continuous and intrusion impacts on hillside views and skyline profiles.
- Land Use Element Policy 10.8: Avoid creation of building sites that will result in significant adverse impacts on the community.
- **Open Space and Conservation Element, Policy 7A:** Preserve to the maximum extent feasible the quality of public views from the hillsides and along the City's shoreline; and
- **Open Space and Conservation Element, Policy 7K:** Preserve as much as possible the natural character of the landscape (including coastal bluffs, hillsides and ridgelines) by requiring proposed development plans to preserve and enhance scenic and conservation values to the maximum extent possible, to minimize impacts on soil mantle, vegetation cover, water resources, physiographic features, erosion problems, and require recontouring and replanting where the natural landscape has been disturbed.
- **Open Space and Conservation Element, Policy 8N:** Prohibit intrusion of fuel modification programs into environmentally sensitive areas, including chaparral and coastal sage scrub.

  Due to the subject property's location at the urban-wildland interface, the proposed road extension and anticipated residential development would require fuel modification extending into a mapped open space preserve area. A fuel modification zone is a strip of land where combustible vegetation has been removed and/or modified and partially or totally replaced with more adequately spaced, drought-tolerant, fire-resistant plants in order to provide a reasonable

level of protection to structures from wildfire. Biological studies would be required to evaluate impacts to the ESAs and ESHA.

- **Open Space and Conservation Element, Policy 14A:** Require construction and grading to be concentrated on slopes of 30% or less; and
- **Open Space and Conservation Element, Policy 14B:** Prohibit construction and grading on slopes of 45% or greater except on properties previously approved by the subdivision map process and located adjacent to a dedicated accepted right-of-way that has been or can be improved to the City's access standards.

  The conceptual house plans propose a program consisting of 3,743 square feet of habitable area, primarily on the lower and middle levels. The lower and middle levels are designed to step with the hillside and, as shown above, encroach significantly into a greater-than-45-percent slope. The proposed turnaround retaining walls would wholly occur within a slope exceeding 45-percent. The General Plan generally prohibits development within these slope areas and project is inconsistent with Policies 14A and 14B.
- **Open Space and Conservation Element, Policy 14C:** Discourage the creation of new building sites that would require construction of a new street or a street extension of more than 12% in grade. Prohibit the creation of new building sites that would require construction of a new street or a street extension of more than 14% in grade.

  The proposed road extension would exceed the maximum 14-percent street grade. As shown on Sheet A-1.1 of the architectural drawings, the road extension slope conditions beyond the existing road barrier include slopes of 16-, 20-, and 30-percent. The General Plan prohibits development of the road extension as conceptually designed.
- **Open Space and Conservation Element, Policy 14F:** Require grading projects to minimize earth-moving operations and encourage preservation of the natural topographic land features;
- **Open Space and Conservation Element, Policy 14G:** Prohibit the dumping of excess fill within hillside areas, unless necessary for the public's health and safety; and
- **Open Space and Conservation Element, Policy 14I:** Discourage new roads or extensions of existing roads into currently inaccessible areas.

  The conceptual plans for the single-family dwelling convey an intent to step the multi-level residence with the slope as intended by Open Space and Conservation Element Policy 14F. However, due to the steep canyon topography, this results in construction within an area exceeding a 45-percent grade, inconsistent with Policies 14A and 14B.
- **Open Space and Conservation Element, Policy 8A:** Preserve the canyon wilderness throughout the City for its multiple benefits to the community, protecting critical areas adjacent to canyon wilderness, particularly stream beds whose loss would destroy valuable resources;
- **Open Space and Conservation Element, Policy 13A:** Preserve the function of ridgelines, hillsides and canyons as a link between adjoining open space areas;
- **Open Space and Conservation Element, Policy 14K:** The conversion of vacant hillside land into various types of urban development creates inescapable side effects that can potentially damage the natural environment. Loss of valuable habitat, increased runoff and erosion, intrusion into the public viewshed and introduction of man-made chemical compounds are often the undesirable by-products of new development. In order to minimize such effects, new

construction and grading should not create undesirable encroachments into undeveloped hillside areas; and

- **Transportation, Circulation and Growth Management Element Policy 2M:** Avoid extending roads and utilities to identified Environmentally Sensitive Areas and unincorporated County lands.

The Project site is located on a hillside and could result in adverse impacts to the community through alteration of the hillside. This impact will be fully analyzed in the EIR.

Issues Requiring Further Study: Impacts associated with section b) are deemed potentially significant and will be fully analyzed in the EIR.

4.12 MINERAL RESOURCES

Mineral resources are commercially viable mineral or aggregate deposits such as sand, gravel, and other construction aggregate. California is the largest consumer of sand and gravel in the nation; but it is also a major provider, producing approximately one billion dollars' worth of mineral resources annually.

The CGS provides objective geologic expertise and information about California's diverse non-fuel mineral resources. Maps, reports, and other data products developed by the CGS staff assist governmental agencies, mining companies, consultants, and the public in recognizing, developing, and protecting important mineral resources. The California Department of Conservation protects mineral resources to ensure adequate supplies for future production. The California Surface Mining and Reclamation Act of 1975 (SMARA) was developed to encourage production and conservation of mineral resources, prevent or minimize adverse effects to the environment, and protect public health and safety.

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☐	☒

4.12.1 Impact Analysis

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?

No Impact. The State Mining and Geology Board establishes Mineral Resources Zones (MRZs) to designate lands that contain mineral deposits. The following classifications are used by the State to define MRZs:

(a) *MRZ-1:* Areas where the available geologic information indicates no significant likelihood of significant mineral deposits.
(b) *MRZ-2a:* Areas where the available geologic information indicates that there are significant mineral deposits.

(c) *MRZ-2b:* Areas where available geologic information indicates that there is a likelihood of significant mineral deposits.
(d) *MRZ-3a:* Areas where the available geologic information indicates that mineral deposits exist. However, the significance of the deposit is undetermined.
(e) *MRZ-3b:* Areas where the available geologic information indicates that mineral deposits are likely to exist. However, the significance of the deposit is undetermined
(f) *MRZ-4:* Areas where there is not enough information available to determine the presence or absence of mineral deposits.

The Laguna Beach General Plan does not discuss the presence of mineral resources, and the Department of Conservation Mineral Land Classification Map classifies the Project site as MRZ-1, meaning an area where available geological information indicates no significant likelihood of significant mineral deposits (CDMG 1981). Therefore, due to the MRZ-1 classification, the Proposed Project would not result in the loss of availability of known mineral resources of value to the region nor result in the loss of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur. No further analysis is required.

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?

No Impact. As stated above in impact (a), the Project site is classified as MRZ-1, meaning an area where available geological information indicates no significant likelihood of significant mineral deposits (CDMG 1981). Therefore, due to the MRZ-1 classification, the Proposed Project would not result in the loss of availability of known mineral resources of value to the region or result in the loss of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur. No further analysis is required.

Issues Requiring Further Study: No issues in this section require further study.

4.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☒	☐	☐	☐

4.13.1 Impact Analysis

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?*

Potentially Significant Impact. The Proposed Project would generate noise during construction and operation. Construction activities may temporarily elevate noise levels due to equipment operation, material transport, and other site activities. Operational noise sources may include vehicle traffic and mechanical equipment. At this time, it is unknown whether noise levels would exceed applicable standards. A noise study will be conducted to assess impacts. The EIR will further analyze potential noise impacts.

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

Potentially Significant Impact. The Proposed Project could generate groundborne vibration or noise during construction activities, particularly from heavy equipment operation and potential pile driving. At this time, it is unknown whether levels of groundborne vibration and noise would exceed applicable thresholds. A noise study will be conducted to assess impacts. The EIR will further analyze potential impacts.

Issues Requiring Further Study. Issues Impacts associated with sections a) - b) are deemed potentially significant and will be fully analyzed in the EIR.

4.14 POPULATION AND HOUSING

Population refers to the occupants of housing projects, population indirectly associated with workers or proposed nonresidential projects, or changes in the amount and distribution of population and employment permitted by adoption or revision to a land use plan. Important areas include changes in the number, characteristics, geographical distribution, and timing of new residents directly or indirectly resulting from a project and the degree to which project-related changes are consistent with city, regional, or other adopted population growth policies. Other issues are the degree to which project-related population is already present in the area under analysis (i.e., already residing or working in the area) or whether they represent immigrants.

Housing impacts may result directly from a project, which includes housing units, or indirectly from revisions to the Housing Element in a General Plan or changes in housing demand associated with new non-residential development projects.

A project would have a significant adverse impact if it would induce substantial population growth in an area, either directly by proposing new homes and businesses or indirectly through the extension of roads or other infrastructure; displaced housing units causing the construction of replacement housing somewhere else; or displaced people causing the construction of replacement housing somewhere else.

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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)?	☐	☐	☒	☐
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

4.14.1 Impact Analysis

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)?

Less Than Significant Impact. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. Although the road expansion would result in the construction of a new single-family home, the Proposed Project would not induce substantial unplanned population growth. The single-family home would be consistent with the R-1 zoning designation. Additionally, the Project site has a General Plan land use designation of Village Low Density, which is intended to provide for single-family residential development and has been accounted for under General Plan build-out. Therefore, the Proposed Project would not induce substantial unplanned population growth to the area, either directly or indirectly, and impacts would be less than significant. No further analysis is required.

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

Less Than Significant Impact. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. The Project site is zoned for R-1, and the Proposed Project would be consistent with this zoning designation. The Proposed Project would not displace substantial numbers or existing people or housing elsewhere. Therefore, impacts would be less than significant. No further analysis is required.

Issues Requiring Further Study: There are no issues in this section requiring further study.

4.15 PUBLIC SERVICES

Public services include fire, police, schools, parks, and libraries. A project would impact a public service if it would result in an increased demand for that service or if the project would result in a hindrance to that service.

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, 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:				
	i) Fire Protection?	☒	☐	☐	☐
	ii) Police Protection?	☐	☐	☐	☒
	iii) Schools?	☐	☐	☐	☒
	iv) Parks?	☐	☐	☐	☒
	v) Other public facilities?	☐	☐	☐	☒

4.15.1 Impact Analysis

a) i) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 fire protection?

Potentially Significant Impact. The LBFD provides fire protection and emergency response services to the City, including the Project site. There are four fire stations within Laguna Beach. Fire Station 2, located at 285 Agate St, approximately 0.5-mile northwest of the Project site, is the nearest fire station to the site. Station 2 is staffed with a Captain, Engineer, and Firefighter and is the largest station in the city. In addition, a two-person ambulance crew also responds from station 2.

The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. The Proposed Project would be consistent with the residential land uses in the area and therefore would not result in the need for construction of new or physically altered fire facilities. Service to the Project site by LBFD occurs under existing conditions and implementation of the Proposed Project is not anticipated to increase calls for service or alter response times or other performance objectives that would result in the need for new or substantially altered LBFD facilities. The Proposed Project would be required to comply with the California Fire Code, as amended, in accordance with LBMC Chapter 15.01, *California Fire Code*. Implementation of all Fire Code requirements would further reduce potential impacts concerning fire protection services. The Proposed Project would not require the need for new or physically altered fire station facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

However, given the sensitivity to the area in regard to wildland fires and City-required design specifications for such projects, impacts would be potentially significant. This impact will be fully analyzed in the EIR..

ii) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 police protection?*

No Impact. Laguna Beach Police Department provides law enforcement to the City, including the Project site. Police services for the City are located at 505 Forest Ave, approximately 1.6 miles northwest of the Project site.

The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. The Proposed Project would not result in the need for construction of new or physically altered police facilities. The LBPD currently provides services to the Project site under existing conditions, and the Proposed Project is not anticipated to increase calls for service or alter response times or other performance objectives that would result in the need for new substantially altered law enforcement facilities. The Project would not require the need for new or physically altered police facilities in order to maintain acceptable services ratios, response times, or other performance objectives. No impact would occur. No further analysis is required.

iii) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 schools?*

No Impact. The City, including the Project site, is served by the Laguna Beach Unified School District (LBUSD). The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. The Project site is zoned for residential uses; therefore, the Project would not directly result in new students to the LBUSD. The Proposed Project would not require the need for new or physically altered school facilities, and no impact would occur. No further analysis is required.

iv) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 parks?*

No Impact. According to the General Plan Land Use Element, the City maintains 29 oceanfront parks and viewing areas totaling approximately 24.7 acres (City 2022). In addition, the City's 6.2 miles of coastline provide recreational beach opportunities, with public access to approximately 82 acres of sandy beaches. Community recreational needs are further supplemented by 13

neighborhood parks, totaling 11.3 acres and 25 acres of outdoor recreational facilities provided by LBUSED. Combined with parks and beach, total public recreational acreage in Laguna Beach is approximately 143 acres.

The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. The Project site would be consistent with the residential land uses in the area and therefore, the Proposed Project would not induce substantial unplanned population growth within the City that would potentially result in a significant increase in the use of existing parks within the area. The Proposed Project would not involve the construction of new park facilities, nor would it result in the need for new or physically altered park facilities. Therefore, the Proposed Project would not result in a substantial adverse physical impact associated with the provision of new or physically altered park facilities, and no impact would occur. No further analysis is required.

v) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 other public facilities?

No Impact. As described in Section 4.14, Population and Housing, the Project would not involve a significant increase in new residents to the City, as the proposed road expansion would facilitate the potential construction of a single-family home, which would be consistent with land use in the area and the surrounding neighborhood. The Proposed Project would not result in the need for new or physically altered public facilities. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities. No impact would occur. No further analysis is required.

Issues Requiring Further Study: Impact a)i) is deemed potentially significant and will be further analyzed in the EIR.

4.16 RECREATION

Recreational facilities include active and passive facilities. Active recreational facilities include parks, tennis and basketball courts, pools, golf courses, and various other facilities. Passive recreational facilities include plazas and other public places.

A project would result in a significant impact on recreational facilities if it would increase the use of existing parks and facilities such that substantial physical deterioration of the facility would occur or be accelerated, or if the project included recreational facilities or required construction that might have an adverse physical effect on the environment.

16.	RECREATION. Would the project:	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?	☐	☐	☐	☒

4.16.1 Impact Analysis

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?

No Impact. As discussed in Section 4.14 (d) the Proposed Project would not result or induce substantial unplanned population growth within the City limit that would potentially result in a significant increase in the use of existing parks or other recreational facilities. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. The Proposed Project would be consistent with the residential land uses in the area. Therefore, no impact to regional parks or recreational facilities would occur. No further analysis is required.

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?

No Impact. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. The Proposed Project does not propose the development of recreational facilities as part of the Project. No impact would occur. No further analysis is required.

Issues Requiring Further Study: There are no issues in this section requiring further study.

4.17 TRANSPORTATION

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?	☒	☐	☐	☐
(b)	For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(c)	Substantially increase hazards due to a geometric design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
(d)	Result in inadequate emergency access?	☒	☐	☐	☐

4.17.1 Impact Analysis

a) Would the project conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?

Potentially Significant Impact. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way.

Transit Facilities

The Orange County Transportation Authority (OCTA) provides public transportation services within the City and surrounding jurisdictions. There are no transit facilities located adjacent to the Project site (OCTA 2023). The closest OCTA bus stop is located approximately 0.23 miles south of the Project site at the corner of Solana Way and Pacific Coast Highway. In addition, the City runs a trolley system along SR-1 (City 2024d). The closest trolley stop is 0.23 miles south of the Project Site, at the same location as the OCTA stop.

No modifications to routes or bus stops within the area would occur as a result of the proposed Project. Project implementation would not conflict with a program plan, ordinance, or policy addressing the circulation system specific to transit facilities. Impacts would be less than significant. No further analysis is required.

Roadway Facilities

Regional access to the site is provided via SR-1 located southwest of the Project site. Local access to the Project site is provided from Alta Vista Way. Within the Project area, Alta Vista Way provides access to Juanita Way. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The City's Transportation, Circulation, and Growth Management Element (TCGME) specifies policies regarding impacts to roadway facilities. As stated previously, the City has determined that the Proposed Project would potentially conflict with the Transportation, Circulation and Growth Management Element Policy 2M, which states that development should avoid extending roads and utilities to identified Environmentally Sensitive Areas and unincorporated County lands. Further analysis of General Plan policies as they pertain to the roadway facilities will be included within the EIR. Thus, this is a potentially significant impact that will be further analyzed in the EIR.

Bicycle Facilities

No existing or planned bicycle facilities occur on Juanita Way. The Proposed Project would not conflict with a program plan, ordinance, or policy specific to bicycle facilities. Impacts would be less than significant. No further analysis is required.

Pedestrian Facilities

The Proposed Project would not disturb existing sidewalk paths along Juanita Way. Any sidewalk additions to Juanita Way as part of the road extension would be compliant with the TCGME. Impacts during construction and operations are not anticipated to conflict with a plan, ordinance, or policy that addresses pedestrian facilities. Impacts towards pedestrian facilities would be less than significant. No further analysis is required.

b) For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines section 15064.3, subdivision (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. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way.

According to the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA, land use projects, such as the Project, "that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact" (OPR 2018). Construction vehicle trips are temporary in nature and would not produce more than 110 trips per day. The daily weekday vehicle trips for a single-family residence is 9.43 trips per dwelling unit. Operation of the proposed single-family residence would not produce more than 110 trips per day. Therefore, because the Project would not generate substantial new vehicle trips, the Project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3 (b). Impact would be less than significant. No further analysis is required.

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

Less Than Significant Impact. The Project site is part of an existing residential neighborhood that is currently served by local roadways and access driveways. The Project site would continue to be accessed by the existing roadway, Juanita Way, and the proposed potential single-family home would be accessed by the proposed road extension.

The City has adopted Title 10, Traffic, into the Municipal Code. Title 10 establishes driving regulations in Chapter 10.02, and contains chapters that monitor turns, stops, parking, and crosswalks. The Municipal Code also includes Title 11, Streets and Sidewalks. Title 11 regulates buildings and materials (Chapter 11.12), street work (Chapter 11.16), excavations (Chapter 11.20), intersection visibility (Chapter 11.30), street openings and extensions (Chapter 11.40), and encroachment permits (Chapter 11.50). Regulations and design standards presented in Municipal Titles 10 and 11 reduce the possibility of Projects implementing hazardous design features and incompatible uses in an area. The Project would be required

to comply with the applicable regulations in the LBMC, reducing potential impacts associated with hazardous design features, such as sharp curves or dangerous intersections. Construction of the proposed residential structure, and road extension would be undertaken in accordance with City standards. Thus, compliance with the City's established regulatory framework, standard engineering practices, and design criteria, which would be verified through the City's development review process, would ensure that potential impacts associated with hazardous design features and incompatible uses at the Project site would be less than significant. No further analysis is required.

d) Would the project result in inadequate emergency access?

Potentially Significant Impact. Access to the Project site is provided via SR-1 located southwest of the Project site. Local access to the Project site is provided from Juanita Way. Within the Project area, Solana Way to Alta Vista Way provide access to Juanita Way. The Project site is at the terminus of Juanita Way, thus construction would not block emergency access routes. While the Proposed Project may introduce temporary traffic delays during construction with vehicles entering and exiting the site, these incidents are limited during the construction phase and would not result in road closures.

The design of the Proposed Project includes complete firefighter access around the building and is subject to a final fire inspection and requires approval prior to occupancy. The Project site is located on a Fuel Modification Zone that is currently in development (City 2025a). A fuel modification zone is an area of land where combustible vegetation is removed and/or modified and partially or totally replaced with more adequately spaced, drought-tolerant, fire-resistant plants in order to provide a reasonable level of protection to structures from a wildland fire. Development contiguous to or within an undeveloped vegetated area (wildland urban interface) requires modification of natural vegetation at the urban interface and an integrated landscape plan (City 2019b).

Per the LFPD LFMSM, a Fuel Modification Plan shall incorporate a minimum of 36" of horizontal clearance and unlimited vertical clearance around the exterior of the structure shall be provided for Firefighter access. Firefighter access shall be made without the need for special tools (ladders) or ability and have permanent improvements installed when ascending or descending from street level (e.g., stairs) (City 2019b). Per City requirements, a licensed architect shall prepare a Landscape/Fuel Modification Plan (LFMP) for the Proposed Project compliant with the LBFD Landscape/Fuel Modification Standards and Maintenance Program. This shall occur prior to issuance of the building permit.

However, given the sensitivity to the area in regard to wildland fires and City-required design specifications for such projects, impacts would be potentially significant. Additionally, information regarding fire truck access and fire hydrant location are unknown. This impact will be fully analyzed in the EIR.

Issues Requiring Further Study. Impacts a) and d) are deemed potentially significant and will be further analyzed in the EIR.

4.18 TRIBAL CULTURAL RESOURCES

This section describes the potential tribal cultural resources effects from implementation of the Proposed Project.

18.	TRIBAL CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, 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:				
	i) 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	☒	☐	☐	☐
	ii) 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 the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

4.18.1 Impact Analysis

i) Would the project cause a substantial adverse change in a 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)?

Potentially Significant Impact. At this time, it is unknown whether the Proposed Project would cause a substantial adverse change to a listed or eligible historical resource. Tribal consultation has not yet occurred, and no determination has been made regarding potential impacts. In accordance with AB 52, consultation with tribes will be conducted, and the EIR will further analyze whether any significant impacts could occur.

ii) Would the project cause a substantial adverse change in 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?

Potentially Significant Impact. The significance of potential impacts on tribal cultural resources has not yet been determined, as consultation with tribal representatives has not yet taken place. The lead agency will conduct tribal consultation in accordance with AB 52 and will further analyze potential impacts in the EIR based on the findings of that process.

Issues Requiring Further Study: Impacts associated with sections i) and ii) are deemed potentially significant and will be fully analyzed in the EIR.

4.19 UTILITIES AND SERVICE SYSTEMS

Utilities and service systems include potable water and wastewater treatment. The quantity of water consumed and wastewater generated by a project is determined by several factors, including the size, type, and characteristics of the project. The need for construction of new or replacement water and wastewater treatment facilities (e.g., reservoirs, storage tanks, water mains, filtration plants, pumps, wells, and other connections or distribution facilities) would depend on the existing capacity and anticipated demand for the Proposed Project site.

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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?	☐	☐	☒	☐
(e)	Negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

4.19.1 Impact Analysis

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

Less Than Significant Impact.

Water

The Project site and surrounding area are within the service area of LBCWD. The Project site is currently undeveloped and surrounded by residential single-family homes and open space. The Project site and

surrounding uses (residential uses) receive water services from LBCWD. As the Proposed Project will connect to the utilities that service the existing community and adjacent homes, implementation of the Proposed Project would not require new or expanded water services, the construction or relocation of which could cause significant environmental effects. Existing LBCWD water lines would continue to serve residential development within the Project site. Therefore, impacts would be less than significant. No further analysis is required.

Wastewater and Water Treatment

Wastewater service in the community is supplied by the City and the South Orange County Wastewater Authority (SOCWA). The City operates the sewer lines and pump stations that collect wastewater from buildings and facilities in Laguna Beach and conveys it to a regional network operated by SOCWA for treatment. The nearest wastewater treatment facility is the Coastal Treatment Plant, located in the unincorporated area of Aliso Canyon. No further analysis is required.

The Proposed Project consists of similar uses to that of the existing conditions (single-family residential land use). The sewer system will be extended along with the proposed road extension and will connect to the extended infrastructure within the right of way. Implementation of the Proposed Project would not require the relocation or construction of new or expanded wastewater facilities, the construction or relocation of which could cause significant environmental effects. Existing wastewater lines would continue to serve residential development within the Project site. Therefore, a less than significant impact would occur. No further analysis is required.

Stormwater Drainage

The Project site is located within a mapped watercourse and open space preserve. Stormwater runoff from Juanita Way would be collected in a storm drain system and conveyed to the natural drainage course below. The existing catch basin at the Project site will be relocated and will connect to existing stormwater drainage systems. However, the relocated catch basin will be placed within the existing Juanita Road Right-of-Way, similar to the existing condition.

The potential environmental effects associated with construction and operation of the Project would further be reduced by compliance with regulatory stormwater requirements, including those presented in LBMC Chapter 16.01, *Water Quality Control*. LBMC Section 16.01.040, *Control of Urban Runoff*, states that prior to issuance of a grading permit, building permit, or Coastal Development Permit, the community development department shall review project plans and impose BMPs, terms, conditions and requirements on the project to ensure that pollutant discharges are prevented, reduced, or removed to the extent practicable. Therefore, the Proposed Project would not require or result in relocation or construction of new or expanded storm water drainage facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant. No further analysis is required.

Electricity, Natural Gas, and Telecommunications

Energy consumption would occur during construction and operation of the Project. The proposed Project would extend existing electrical, natural gas, and telecommunications infrastructure to the Project site. The existing infrastructure serves the existing community. The potential environmental effects associated

with the construction and operation of the Project would be less than significant with compliance with regulatory requirements. Impacts would be less than significant. No further analysis is required.

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?

No Impact. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. LBCWD and South Coast Water District supply water to the City. The Project is within the LBCWD jurisdiction. In the 2020 UWMP, LBCWD confirmed that there is a sufficient amount of water to supply Laguna Beach residents, including the Project site, during normal, dry, and multiple dry years. Therefore, the Proposed Project would result in no impact. No further analysis is required.

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?

Less Than Significant Impact. Wastewater service in the community is provided by the City and SOCWA. The City operates a sanitary sewer system that serves a population of approximately 22,700 in an 8.7-square-mile service area, including the Project site. The sewer system serves 7,688 residential connections and 355 commercial, industrial, and institutional customers, as of 2014. The sewer system consists of 85.71 miles of gravity sewers (approximately 2,937-line segments), 2,674 manholes, 9.44 miles of force mains, and 25 lift stations (City 2024b).

The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. The proposed addition of a single-family residence in the neighborhood would generate additional wastewater. The Proposed Project would connect to the existing wastewater system and would not require the expansion of such facilities. Additionally, the Proposed Project would comply with LBMC Chapter 17.25, *Sewer Service Charge*, which imposes an annual sewer service charge to pay for operating and capital improvement costs of the City sewer system. Therefore, with compliance of LBMC Chapter 17.25, implementation of the Proposed Project would result in a less than significant impact to wastewater treatment. No further analysis is required.

d) Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?

Less Than Significant Impact. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. There is no demolition required, thus no waste would be produced that would otherwise need to be transported to the landfill.

Therefore, no demolition is required. Waste Management provides solid waste and recycling collection services to the City. The Proposed project would generate solid waste during construction and operational activities. The Proposed Project is consistent with the area's R1 zoning designation; operation of the

Proposed Project is anticipated to generate a similar amount of solid waste as existing conditions in the existing neighborhood. The Proposed Project would not generate solid waste in excess of State or local standards. Therefore, a less than significant impact would occur. No further analysis is required.

e) Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The Proposed Project would generate solid waste during construction and operational activities. The Proposed Project consists of constructing an additional 18.5 linear feet of road surface at the terminus of Juanita Way. The Proposed Project would facilitate the construction of a new building site and potential development of a single-family residence at 2400 Juanita Way. Operation of the Proposed Project is anticipated to generate a similar amount of solid waste as existing conditions in the existing neighborhood. The Proposed Project would not negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals. Therefore, a less than significant impact would occur. No further analysis is required.

Issues Requiring Further Study: There are no issues in this section requiring further study.

4.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	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 downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☒	☐	☐	☐

4.20.1 Impact Analysis

a) Would the project impair an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact. The Project site is not located within or near a fire hazard severity zone in state responsibility area (CalFire 2024). However, the Project site is identified as being within a VHFHSZ within a Local Responsibility Area (City 2024a). Given the sensitivity to the area in regard to wildland fires and City-required design specifications for such projects, impacts would be potentially significant. This impact will be fully analyzed in the EIR.

b) 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?

Potentially Significant Impact. The Project site is not located within or near a fire hazard severity zone in state responsibility area (CalFire 2024). However, the Project site is identified as being within a VHFHSZ within a Local Responsibility Area (City 2024a). Given the sensitivity to the area in regard to wildland fires and City-required design specifications for such projects, impacts would be potentially significant. This impact will be fully analyzed in the EIR.

c) 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?

Potentially Significant Impact. The Project site is not located within or near a fire hazard severity zone in state responsibility area (CalFire 2024). However, the Project site is identified as being within a VHFHSZ within a Local Responsibility Area (City 2024a). Given the sensitivity to the area in regard to wildland fires and City-required design specifications for such projects, impacts would be potentially significant. This impact will be fully analyzed in the EIR.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Potentially Significant Impact. The Project site is not located within or near a fire hazard severity zone in state responsibility area (CalFire 2024). However, the Project site is identified as being within a VHFHSZ within a Local Responsibility Area (City 2024a). Given the sensitivity to the area in regard to wildland fires and City-required design specifications for such projects, impacts would be potentially significant. This impact will be fully analyzed in the EIR.

Issues Requiring Further Study: Impacts a)-d) are deemed potentially significant and will be further analyzed in the EIR.

SECTION 5.0 – REFERENCES

California Department of Conservation (DOC)

2024 California Important Farmland Finder. URL: https://maps.conservation.ca.gov/DLRP/CIFF/

California Department of Forestry and Fire Protection (CALFIRE)

2024 Fire Hazard Safety Zone Map. URL: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008

California Department of Mines and Geology (CDMG)

1981 Generalized Aggregate Resource Classification Map; Orange County – Temescal Valley and Adjacent Production – Consumption Regions. Authored by R.V. Miller, R.E. Corbsley, T.B. Anderston et al.

California Department of Transportation (Caltrans)

2024 California Scenic Highway Mapping System. URL: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

California Geological Survey (CGS)

2024a Earthquake Zones of Required Investigation. URL: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/

2024b Tsunami Hazard Zones. URL: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/#data_s=id%3AdataSource_3-1918f9f263a-layer-15%3A6

California Governor's Office of Planning and Research (OPR)

2018 Technical Advisory on Evaluating Transportation. URL: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

City of Laguna Beach (City)

1976 Environmentally Sensitive Areas Map.

2005 City of Laguna Beach General Plan – Open Space and Conservation Element.

2012 Laguna Beach General Plan – Land Use Element. URL: https://www.lagunabeachcity.net/home/showpublisheddocument/8146/638001338428230000

2018 Laguna Beach General Plan Landscape and Scenic Highways Element. URL: https://www.lagunabeachcity.net/home/showpublisheddocument/8156/637502780391970000

2019a Arch Beach Heights. URL: https://www.lagunabeachcity.net/home/showpublisheddocument/10304/638736585903170000

2019b Laguna Beach Fire Department Landscape/Fuel Modification Standards and Maintenance Program. URL: https://www.lagunabeachcity.net/home/showpublisheddocument/444/637409828342370000

2019c Community Development Department Planning Commission Staff Report.

2024a Public Map Viewer. URL: https://gis.lagunabeachcity.net/Html5Viewer/index.html?viewer=LagunaBeachPublicGIS

2024b Regulatory Compliance. URL: https://www.lagunabeachcity.net/government/departments/water-quality/regulatory-compliance

2024c Community-wide and Municipal Operations Greenhouse Gas (GHG) Emissions – Results for 2018, 2021, 2030, and 2045. URL: https://www.lagunabeachcity.net/home/showpublisheddocument/17747/638423946819200000

2024d Laguna Beach Trolley. URL: https://www.lagunabeachcity.net/home/showdocument?id=19874

2025a GIS Map of Fuel Modification Zones. URL: https://lagunabeach.maps.arcgis.com/apps/webappviewer/index.html?id=2c83384651774e42821b331b43dcd1b2&extent=-13121947.869%2C3961578.1984%2C-13097488.0199%2C3973588.3665%2C102100

2025b City of Laguna Beach GIS Map – Public. URL: https://www.arcgis.com/apps/mapviewer/index.html?webmap=2813315a21324b58aa2e0ddb4104fb09

Department of Toxic Substances Control (DTSC)

2024 EnviroStor Database. URL: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Search

Federal Emergency Management Agency (FEMA)
2024 National Flood Hazard Layer. URL: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent

Geofirm
2017 Preliminary Geotechnical Investigation Proposed New Single-Family Residence.

Google Earth
2024 URL: https://earth.google.com/web/

Orange County (County)
2008 Airport Land Use Commission for John Wayne Airport. URL: https://files.ocair.com/media/2021-02/JWA_AELUP-April-17-2008.pdf?VersionId=cB0byJjdad9OuY5im7Oaj5aWaT1FS.vD

2023 Orange County Transit Authority (OCTA). Orange County System Map. URL: https://www.octa.net/ebusbook/routePdf/SouthCounty.pdf?n=2023

State Water Resources Control Board (SWRCB)
2024 GeoTracker Database. URL: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Search+GeoTracker

Stuart, C.J
1979 Lithofacies and origin of the San Onofre Breccia, coastal southern California. In, C.J. Stuart (ed.), *A Guidebook to Miocene Lithofacies and Depositional Environments, Coastal Southern California and Northwestern Baja California*. Society of Economic Paleontologists and Mineralogists, Pacific Section, pp. 25-42.

Total Engineering Inc. (Total)
2023 Off-Site Hydrology Study.

United States Department of Agriculture (USDA)
2025 Web Soil Survey. URL: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx

Western Regional Climate Center (WRCC)
2016 Long Beach Daugherty Field, California Monthly Climate. URL: https://wrcc.dri.edu/Climsum.html.

APPENDIX A – BIOLOGICAL TECHNICAL REPORT

BIOLOGICAL TECHNICAL REPORT FOR PROPOSED 2400 JUANITA WAY, LAGUNA BEACH, ORANGE COUNTY, CALIFORNIA

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December 2017

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I. SITE LOCATION

This report addresses the biological resources associated with a newly proposed single-family home, at 2400 Juanita Way (Study Area) located in the City of Laguna Beach, Orange County, California (Exhibit 1: Regional Map). The Study Area is located in the Arch Beach Heights area on the undeveloped slopes as an extension of Juanita Way, west of Iris Way, and north of Alta Vista Way, in Section 31 of Township 7 South, Range 8 West of the Laguna Beach 7.5" U.S. Geological Survey (USGS) Quadrangle Map [dated 1965 and photorevised in 1981]. The Study Area is depicted on Exhibit 2: Vicinity Map.

II. SITE DESCRIPTION AND PROJECT PURPOSE

As indicated above, the Study Area addressed in this report includes a single-family residence and associated fuel modification zone which is limited to the parcel, depicted on Exhibit 2. The property totals 0.184 acres, which includes the overlap with the proposed fuel modification zone. Proposed fuel modification would require approximately fifty-percent thinning of vegetation. The Study Area is located on a hillside adjacent to existing residential housing development and includes moderate to steep canyons that are vegetated with chaparral and coastal sage scrub habitat, as well as ornamental and non-native vegetation.

The purpose for conducting biological surveys is to determine where special-status species would be affected by the project.

The Study Area consists of hillside and canyon areas vegetated with chaparral, coastal sage scrub, and large areas of a transitional state between the two that are dominated by lemonade berry (*Rhus integrifolia*). Throughout portions of the site, an existing fuel modification area consisting of a band of primarily non-native and ornamental vegetation separates the residential housing from the native habitat. Exhibit 3 depicts the vegetation communities found within the Study Area.

Dominant plant species within chaparral habitat include lemonade berry, toyon (*Heteromeles arbutifolia*), big-pod ceanothus (*Ceanothus megacarpus*), mesa bushmallow (*Malacothamnus fasciculatus*), laurel sumac (*Malosma laurina*), and giant wild rye (*Elymus condensatus*).

Coastal sage scrub habitat within the Study Area is dominated by black sage (*Salvia mellifera*), California sagebrush *(Artemisia californica),* California buckwheat (*Eriogonum fasciculatum*), coastal prickly pear (*Opuntia littoralis*), orange bush monkey-flower (*Mimulus aurantiacus*), coastal goldenbush (*Isocoma menziesii*), and deerweed (*Acmispon glaber*).

III. METHODS

Biologist Tony Bomkamp from Glenn Lukos Associates, Inc. (GLA) visited the Study Area on December 20, 2017 and January 3, 2018 to identify the presence of habitat capable of supporting special-status species and habitats, including conducting focused surveys for special-status

plants. The area was also evaluated for the presence of aquatic features potentially subject to the jurisdiction of the U.S. Army Corps of Engineers (Corps) pursuant to Section 404 of the Clean Water Act and the California Department of Fish and Wildlife (CDFW) pursuant to Section 1602 of the California Fish and Game Code. Reconnaissance was conducted in such a manner as to allow inspection of the entire site by direct observation, including the use of binoculars, for avian surveys.

In addition to site reconnaissance, the study included a review of the CNDDB for the Laguna Beach Quadrangle[1], a review of the 2010 CNPS rare plant inventory[2], and a review of the Natural Resources Conservation Service's (NRCS)[3] soil survey for Laguna Beach.

IV. REGULATORY SETTING/REQUIREMENTS

The proposed activities may be subject to local, state, and federal regulations associated with a number of regulatory programs. These programs often overlap and were developed to protect natural resources, including: state- and federally-listed plants and animals; aquatic resources including rivers and creeks, ephemeral streambeds, wetlands, and areas of riparian habitat; other special-status species which are not listed as threatened or endangered by the state or federal governments; and other special-status vegetation communities.

A. State and/or Federally Listed Plants or Animals

1. State of California Endangered Species Act

California's Endangered Species Act (CESA) defines an endangered species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease." The State defines a threatened species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an Endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species." Candidate species are defined as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list." Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the Federal Endangered Species Act (FESA), CESA does not list invertebrate species.

[1] California Department of Fish and Wildlife. June 2014. Natural Diversity Database: RareFind 5.0.
[2] California Native Plant Society. 2010. Inventory of Rare and Endangered Plants of California (Eighth Edition).
[3] NRCS was formerly the Soil Conservation Service (SCS).

Article 3, Sections 2080 through 2085, of the CESA addresses the taking of threatened, endangered, or candidate species by stating "No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided." Under the CESA, "take" is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Exceptions authorized by the state to allow "take" require permits or memoranda of understanding and can be authorized for endangered species, threatened species, or candidate species for scientific, educational, or management purposes and for take incidental to otherwise lawful activities. Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

2. Federal Endangered Species Act

The FESA of 1973 defines an endangered species as "any species that is in danger of extinction throughout all or a significant portion of its range." A threatened species is defined as "any species that is likely to become an Endangered species within the foreseeable future throughout all or a significant portion of its range." Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to "take" any listed species. "Take" is defined in Section 3(18) of FESA: "...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Further, the U.S. Fish and Wildlife Service (USFWS), through regulation, has interpreted the terms "harm" and "harass" to include certain types of habitat modification that result in injury to, or death of species as forms of "take." These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a Federal agency for an action that could affect a federally listed plant and animal species, the property owner and agency are required to consult with USFWS. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants.

3. State and Federal Take Authorizations for Listed Species

Federal or state authorizations of impacts to or incidental take of a listed species by a private individual or other private entity would be granted in one of the following ways:

- Section 7 of the FESA stipulates that any federal action that may affect a species listed as threatened or endangered requires a formal consultation with USFWS to ensure that the action is not likely to jeopardize the continued existence of the listed species or result in destruction or adverse modification of designated critical habitat. 16 U.S.C. 1536(a)(2).

- In 1982, the FESA was amended to give private landowners the ability to develop Habitat Conservation Plans (HCP) pursuant to Section 10(a) of the FESA. Upon development of an HCP, the USFWS can issue incidental take permits for listed species where the HCP specifies at minimum, the following: (1) the level of impact that will result from the

taking, (2) steps that will minimize and mitigate the impacts, (3) funding necessary to implement the plan, (4) alternative actions to the taking considered by the applicant and the reasons why such alternatives were not chosen, and (5) such other measures that the Secretary of the Interior may require as being necessary or appropriate for the plan.

- Sections 2090-2097 of the CESA require that the state lead agency consult with CDFW on projects with potential impacts on state-listed species. These provisions also require CDFW to coordinate consultations with USFWS for actions involving federally listed as well as state-listed species. In certain circumstances, Section 2080.1 of the California Fish and Game Code allows CDFW to adopt the federal incidental take statement or the 10(a) permit as its own based on its findings that the federal permit adequately protects the species under state law.

B. Aquatic Resources

1. U.S. Army Corps of Engineers

Pursuant to Section 404 of the Clean Water Act, the Corps regulates the discharge of dredged and/or fill material into waters of the United States. The term "waters of the United States" is defined in Corps regulations at 33 CFR Part 328.3(a) as:

(1) All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
(2) All interstate waters including interstate wetlands;
(3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect foreign commerce including any such waters:
(i) Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
(ii) From which fish or shell fish are or could be taken and sold in interstate or foreign commerce; or
(iii) Which are used or could be used for industrial purpose by industries in interstate commerce...
(4) All impoundments of waters otherwise defined as waters of the United States under the definition;
(5) Tributaries of waters identified in paragraphs (a) (1)-(4) of this section;
(6) The territorial seas;
(7) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a) (1)-(6) of this section.

In the absence of wetlands, the limits of Corps jurisdiction in non-tidal waters, such as intermittent streams, extend to the ordinary high water mark (OHWM) which is defined at 33 CFR 328.3(e) as:

> *...that line on the shore established by the fluctuation of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.*

The term “wetlands” (a subset of “waters of the United States”) is defined at 33 CFR 328.3(b) as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support...a prevalence of vegetation typically adapted for life in saturated soil conditions." The discharge of dredge or fill material into waters of the United States, including wetlands requires authorization from the Corps prior to impacts.

2. Regional Water Quality Control Board

Regional Water Quality Control Board (RWQCB) jurisdiction includes all waters or tributaries to waters that are determined to be waters of the United States plus any waters that may lack a connection to a federal nexus. RWQCB jurisdiction, similar to waters of the United States, is typically delineated at the OHWM but may also include isolated vernal pools, isolated wetlands, or other aquatic habitats not normally subject to federal regulation (under Section 404 of the Clean Water Act). The RWQCB regulates isolated features under Section 13260 of the state Porter-Cologne Act.

3. California Department of Fish and Wildlife

Pursuant to Division 2, Chapter 6, Sections 1600-1603 of the California Fish and Game Code, the CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake, which supports fish or wildlife.

CDFW defines a "stream" (including creeks and rivers) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation." CDFW's definition of "lake" includes "natural lakes or man-made reservoirs."

Diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake which supports fish or wildlife, require authorization from CDFW by means of entering into an agreement pursuant to Section 1601 or 1603 of the Fish and Game Code.

4. California Coastal Commission

The California Coastal Commission (CCC) regulates the diking, filling, or dredging of wetlands within the coastal zone. The Coastal Act Section 30121 defines "wetlands" as land "which may be covered periodically or permanently with shallow water." The 1998 CCC Statewide Interpretive Guidelines state that hydric soils and hydrophytic vegetation "are useful indicators of wetland conditions, but the presence or absence of hydric soils and/or hydrophytes alone are not necessarily determinative when the Commission identifies wetlands under the Coastal Act. In the past, the Commission has considered all relevant information in making such determinations and relied upon the advice and judgment of experts before reaching its own independent conclusion as to whether a particular area will be considered wetland under the Coastal Act. The Commission intends to continue to follow this policy."

Areas regulated by the Corps, RWQCB, CDFW and CCC are often not coincident due to the different goals of the respective regulatory programs as well as because these agencies use different definitions for determining the extent of wetland areas. The Corps requires that under normal circumstances, all three wetland parameters (i.e., hydrophytic vegetation, hydric soils, and wetland hydrology) be present for an area to be considered as a jurisdictional wetland; whereas, the CCC policy provides for a positive determination for the presence of wetlands based on the presence of any one of the three criteria.

C. Local Approvals

1. City of Laguna Beach

The Project Site is located within the coastal zone, which is under the permitting authority of the City of Laguna Beach through the City's Local Coastal Program. In addition, the City has inventoried biological resources occurring within the City and has designated several categories of habitat value, ranging from low value habitats to very high value habitats[4]. The Project Site occurs partially within an area designated as a high value habitat. High value habitats are described by the City as:

> *" . . . extensive areas dominated by indigenous plant communities, which possess good species diversity. They are often, but not always, linked to extensive open space areas, within or outside of the City, by traversable open space corridors. Their faunal carrying capacity is good to excellent; many areas are utilized as bedding and foraging sites by mule deer, or possess large resident populations of birds or native small mammals."*

Areas which contain environmentally sensitive habitat resources as identified through an on-site biological assessment process, including areas of "High" and "Moderate" habitat value on the Biological Resources Values Map and areas which meet the definition of ESA's in Section 30107.5 of the Coastal Act, including streams, riparian habitats, and areas of open coastal waters, including tidepools, areas of special biological significance will be addressed below.

[4] City of Laguna Beach. 1993. Laguna Beach General Plan; Open Space/Conservation Element (updated February 2006)

"*When subdivision proposals are situated in areas designated as high or very high value on the Biological Values map and where these are confirmed by subsequent onsite assessment:*
a) Require maximum preservation possible of the high value habitats and when appropriate, require that mitigation measures be enacted for immediately adjacent areas.
b) Require preservation of the very high value habitats and, when appropriate, require that mitigation measures be enacted for immediately adjacent areas.
c) Create no new building sites which are entirely within a coastal ESA or which do not contain an area where development can occur consistent with the ESA policies of this Plan. "

Where development is proposed on a legal building site, as defined in the zoning ordinance, and is consistent with all other policies of this Land Use Plan except for its location entirely within an area identifies and mapped on the coastal ESA map, the following shall apply:

"c) Construction or remodeling of a single-family house will be allowed, only if the area of development or development related disturbance is minimized and environmentally sensitive areas are protected. Mitigation will likely include protection of habitat during construction and prohibited of fencing; mitigation may also include, but is not limited to, enhancement of existing, offsite degraded habitat and/or provision of an on-site biologist during the construction process."

The City requires that all development proposals, including fuel modification proposals, located within or adjacent to high value or very high value habitat, undergo detailed biological assessments. Pursuant to the City's general plan these biological assessments are to utilize the biological value criteria specified in the City's Biological Resource Inventories as a means to conduct an updated, and smaller-scale assessment of the resources actually present on site.

In regard to proposed fuel modification activities within areas designated as high value or very high value habitat, the City's General Plan specifically,

" Prohibit[s] intrusion of fuel modification programs into environmentally sensitive areas, including chaparral and coastal sage scrub."

In an effort to protect watershed areas and natural watercourses, the City has designated several drainage features throughout the City as "significant drainage courses". Avoidance of these drainage courses is recommended within the City's General Plan so as to minimize the likelihood of disasters such as flooding and mudslides, and to protect water supply, water quality, and valuable habitat lands and ecological systems. Two significant drainage courses and their associated tributaries occur adjacent to the proposed fuel modification area, but will be entirely avoided.

D. California Environmental Quality Act

1. CEQA Guidelines Section 15380

The California Environmental Quality Act (CEQA) requires evaluation of a project's impacts on biological resources and provides guidelines and thresholds for use by lead agencies for evaluating the significance of proposed impacts. Sections VII.A.1 and VII.A.2 below set forth these thresholds and guidelines. Furthermore, pursuant to the CEQA Guidelines Section 15380, CEQA provides protection for non-listed species that could potentially meet the criteria for state listing. For plants, CDFW adopts the California Rare Plant Ranks (CRPR) and recognizes that species ranked as Rank 1A, 1B, 2A, or 2B of the CNPS *Inventory of Rare and Endangered Plants in California* may meet the criteria for listing and should be considered under CEQA. CDFW also recommends protection of plants, which are regionally important, such as locally rare species, disjunct populations of more common plants, or plants on the CNPS Ranks 3 or 4.

2. Non-Listed Special-Status Plants and Animals Evaluated Under CEQA

Federally Designated Special-Status Species

Within recent years, the USFWS instituted changes in the listing status of candidate species. Former C1 (candidate) species are now referred to simply as candidate species and represent the only candidates for listing. Former C2 species (for which the USFWS had insufficient evidence to warrant listing) and C3 species (either extinct, no longer a valid taxon or more abundant than was formerly believed) are no longer considered as candidate species. Therefore, these species are no longer maintained in list form by the USFWS, nor are they formally protected. However, some USFWS field offices have issued memoranda stating that former C2 species are to be considered federal Species of Concern (FSC). This term is employed in this document, but carries no official protections. All references to federally protected species in this report (whether listed, proposed for listing, or candidate) include the most current published status or candidate category to which each species has been assigned by USFWS.

For this report the following acronyms are used for federal special-status species:

- FE Federally listed as Endangered
- FT Federally listed as Threatened
- FPE Federally proposed for listing as Endangered
- FPT Federally proposed for listing as Threatened
- FC Federal candidate species (former C1 species)
- FSC Federal Species of Concern (former C2 species)

State-Designated Special-Status Species

Some mammals and birds are protected by the state as Fully Protected (SFP) Mammals or Fully Protected Birds, as described in the California Fish and Game Code, Sections 4700 and 3511, respectively. California Species of Special Concern (SSC) are species designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. This

list is primarily a working document for the CDFW's CNDDB project. Informally listed taxa are not protected, but warrant consideration in the preparation of biotic assessments. For some species, the CNDDB is only concerned with specific portions of the life history, such as roosts, rookeries, or nest sites.

For this report the following acronyms are used for State special-status species:

- SE State-listed as Endangered
- ST State-listed as Threatened
- SR State-listed as Rare
- SCE State candidate for listing as Endangered
- SCT State candidate for listing as Threatened
- SFP State Fully Protected
- SP State Protected
- SSC California Special Concern Species (CDFW)

Literature Search

Prior to conducting fieldwork, pertinent literature on the flora of the region was examined. A thorough archival review was conducted using available literature and other historical records. These resources included the following:

- CNPS, Inventory of Rare and Endangered Plants of California (Eighth Edition), 2010.
- CNDDB Rarefind 5.0, for USGS 7.5' Laguna Beach quadrangle, which contains the Study Area, 2014.

V. VEGETATION MAPPING

During vegetation mapping of the site, seven different habitat associations were identified. Table 1 provides a summary of vegetation types/land uses and the corresponding acreage. Detailed descriptions of each vegetation type follow the table. A Vegetation Map is attached as Exhibit 3.

Table 1.
Summary of Vegetation/Land Use Types for the Study Area

Vegetation/Land Use Type	**Area (Acres)**
Fuel Modification Zone/Disturbed	0.022
Giant Wildrye	0.002
Iceplant	0.010
Lemonade berry	0.133
Myoporum	0.004
Ornamental	0.008
Toyon	0.005

Total Vegetation/Land Use Acreage	0.184

Fuel Modification Zone/Disturbed

Fuel modification and portions of the property that are disturbed accounts for approximately 0.022 acres and best characterizes much of the vegetation on the site due to the mosaic of native and non-native ornamental species that have been planted or volunteered on the site. In some instances, species occur in clumps forming a mosaic of small clumps; whereas in other areas, there is a mix of many species including canopy, shrub, and herbaceous layer. Species included in this land-cover type include different species of agave (*Agave* spp.), a number of species of aloe (*Aloe* spp.), pride of Maderia (*Echium fastuosum*), tree tobacco (*Nicotiana glauca*), and Peruvian pepper tree (*Schinus molle*).

Giant Wildrye

Giant Wildrye (*Elymus condensatus*) at the site consists of approximately 0.002 acres. The entire area consisted of giant wildrye.

Iceplant

Fig marigold (*Carpobrotus edulis*) at the site occupies an area of approximately 0.01 acres. Additional species within this habitat association include: California buckwheat (*Eriogonum fasciculatum*), coastal prickly pear (*Opuntia littoralis*), orange bush monkey-flower (*Mimulus aurantiacus*).

Lemonade berry

Lemonade berry (*Rhus integrifolia*) at the site occupies an area of approximately 0.133 acres and primarily occurs adjacent to existing residential development, and downslope of existing development where landscaped areas have expanded into natural areas. The habitat consists of areas of chaparral that have been subject to past or present disturbance. Species within this community include: toyon (*Heteromeles arbutifolia*), big-pod ceanothus (*Ceanothus megacarpus*), mesa bushmallow (*Malacothamnus fasciculatus*), laurel sumac (*Malosma laurina*), black sage (*Salvia mellifera*), California sagebrush (*Artemisia californica*), and coastal goldenbush (*Isocoma menziesii*).

Myoporum

Myoporum (*Myoporum laetum*) at the site occupies an area of approximately 0.004 acres. The area consists on one large individual myoporum shrub.

Ornamental

Ornamental vegetation within the study area occupies an area of approximately 0.008 acres. As a result, these areas contain a relatively large component of non-native or ornamental vegetation, including, but not limited to, species such as myoporum, acacia (*Acacia* sp.), eucalyptus (*Eucalyptus* sp.), tree tobacco (*Nicotiana glauca*), and Peruvian pepper tree (*Schinus molle*). These areas primarily occur adjacent to existing residential development and appear to have resulted from residents' fuel modification attempts.

Toyon

Toyon at the site occupies an area of approximately 0.005 acres. The area consists on one large individual toyon shrub.

VI. SPECIAL-STATUS SPECIES AND HABITATS

Species were considered based on a number of factors, including: 1) species identified by the March 2014 CNDDB as occurring (either currently of historically) on or in the vicinity of the subject areas, and 2) any other special-status species that are known to occur within the vicinity of the subject areas, or for which potentially suitable habitat occurs within the subject areas.

A. Special-Status Animals

1. State- or Federally-Listed Animal Species

Table 2 includes a summary list of the special-status animal species considered in the biological study and their status. All species were evaluated for their potential to occur on the site. State- and/or federally-listed animal species or species proposed for listing that were considered for this report include: the federally-listed threatened coastal California gnatcatcher (*Polioptila californica californica*), the federally- and state-listed endangered least Bell's vireo (*Vireo belli pusillus*), the federally-listed endangered Pacific pocket mouse (*Perognathus longimembris pacificus*), and the federally-listed endangered tidewater goby (*Eucyclogobius newberryi*). There is no suitable habitat for any of these federally- or state-listed species.

2. Other Special-Status Animal Species

Other special-status species that have the potential to occur in the subject areas based on habitat and range include the orangethroat whiptail (*Aspidoscelis hyperythra*), red-diamond rattlesnake (*Crotalus ruber*), western mastiff bat (*Eumops perotis californicus*), and coast horned lizard (*Phrynosoma blainvillii* (*blainvillii* population)). No special-status animal species were observed within the Study Area.

Table 2. Special-Status Wildlife Species Considered for the Biological Study

Species	Status	Habitat Requirements	Occurrence on Site
FEDERALLY OR STATE-LISTED THREATENED OR ENDANGERED SPECIES			
Eucyclobobius newberryi Tidewater goby	Federal: FE State: None CDFW: SSC	Occurs in shallow lagoons and lower stream reaches along the California coast from Agua Hedionda Lagoon, San Diego Co. to the mouth of the Smith River.	Does not occur on site due to lack of suitable habitat.
Perognathus longimembris pacificus Pacific pocket mouse	Federal: FE State: None CDFW: SSC	Fine, alluvial soils along the coastal plain. Scarcely in rocky soils of scrub habitats.	Does not occur on site due to lack of suitable habitat.
Polioptila californica californica Coastal California gnatcatcher	Federal: FT State: None CDFW: SSC	Low elevation coastal sage scrub and coastal bluff scrub.	Does not occur on site due to lack of suitable habitat.
Vireo bellii pusillus Least Bell's vireo	Federal: FE State: SE CDFW: None	Dense riparian habitats with a stratified canopy, including southern willow scrub, mule fat scrub, and riparian forest.	Does not occur on site due to lack of suitable habitat.
OTHER SPECIAL-STATUS ANIMALS			
Actinemys marmorata pallida Southwestern pond turtle	Federal: FSC State: None CDFW: SSC	Slow-moving permanent or intermittent streams, small ponds and lakes, reservoirs, abandoned gravel pits, permanent and ephemeral shallow wetlands, stock ponds, and treatment lagoons. Abundant basking sites and cover necessary, including logs, rocks, submerged vegetation, and undercut banks.	Does not occur on site due to lack of suitable habitat.
Aspidoscelis hyperythrus Orange-throated whiptail	Federal: None State: None CDFW: SSC	Coastal sage scrub, chaparral, non-native grassland, oak woodland, and juniper woodland.	Does not occur on site due to lack of suitable habitat.
Athene cunicularia Burrowing owl	Federal: FSC State: None CDFW: SSC	Shortgrass prairies, grasslands, lowland scrub, agricultural lands (particularly rangelands), coastal dunes, desert floors, and some artificial, open areas as a year-long resident. Occupies abandoned ground squirrel burrows as well as artificial structures such as culverts and underpasses.	Does not occur on site due to lack of suitable habitat.
Buteo regalis Ferruginous hawk (wintering)	Federal: FSC State: None CDFW: SSC	Open, dry country, perching on trees, posts, and mounds. In California, wintering habitat consists of open terrain and grasslands of the plains and foothills.	Does not occur on site due to lack of suitable habitat.
Campylorhychus brunneicapillus couesi Coastal cactus wren	Federal: None State: None CDFW: SSC	Occurs almost exclusively in cactus (cholla and prickly pear) dominated coastal sage scrub.	Does not occur on site due to lack of suitable habitat.

Species	Status	Habitat Requirements	Occurrence on Site
Crotalus ruber Red-diamond rattlesnake	Federal: None State: None CDFW: SSC	Habitats with heavy brush and rock outcrops, including coastal sage scrub and chaparral.	Does not occur on site due to lack of suitable habitat.
Danaus plexippus Monarch butterfly (wintering)	Federal: None State: None CDFW: None	Roosts in winter in wind-protected tree groves along the California coast from northern Mendocino to Baja California, Mexico.	Does not occur on site due to lack of suitable habitat.
Elanus leucurus White-tailed kite (nesting)	Federal: FSC State: None CDFW: CFP	Low elevation open grasslands, savannah-like habitats, agricultural areas, wetlands, and oak woodlands. Dense canopies used for nesting and cover.	Low potential to forage on site, no suitable nesting habitat occurs on site.
Eumops perotis californicus western mastiff bat	Federal: None State: None CDFW: SSC	Many open, semi-arid to arid habitats, including conifer & deciduous woodlands, coastal scrub, grasslands, chaparral etc.	Low potential to occur on site; would not present a constraint to vegetation thinning.
Icteria virens Yellow-breasted chat	Federal: None State: None CDFW: SSC	Dense, relatively wide riparian woodlands and thickets of willows, vine tangles, and dense brush with well-developed understories.	Does not occur on site due to lack of suitable habitat.
Nyctinomops macrotis Big free-tailed bat	Federal: None State: None CDFW: SSC	Occurs in low-lying arid areas in Southern California. Roosts in high cliffs or rocky outcrops.	Does not occur on site due to lack of suitable habitat.
Phrynosoma coronatum (*blainvillii* population) Coast (San Diego) horned Lizard	Federal: FSC State: None CDFW: SSC	Chaparral and coastal sage scrub.	Does not occur on site due to lack of suitable habitat.
Spea hammondii Western spadefoot	Federal: FSC State: None CDFW: SSC	Seasonal pools in coastal sage scrub, chaparral, and grassland habitats.	Does not occur on site due to lack of suitable habitat.

Federal
FE – Federally Endangered
FT – Federally Threatened
FPT – Federally Proposed Threatened
FSC – Federal Species of Concern
FD – Federally Delisted

State
SE – State Endangered
ST – State Threatened

CDFW
SSC – California Species of Concern
CFP – California Fully-Protected Species

B. Special-Status Plants

Species were considered based on a number of factors including: 1) species identified by the March 2014 CNDDB as occurring (either currently of historically) on or in the vicinity of the subject areas, and 2) any other special-status species that are known to occur within the vicinity of the subject areas, or for which potentially suitable habitat occurs on site. The CNPS has

compiled an inventory comprised of information focusing on geographic distribution and qualitative characterization of rare, threatened or endangered vascular plant species of California. The current inventory (Eighth Edition, 2010) was used to identify sensitive plant species that occur on or in the vicinity of the subject areas.

1. Sate or Federally Listed Plant Species

State- and/or federally-listed plant species or species proposed for listing that are addressed in this report include: the federally- and state-listed threatened Laguna Beach dudleya (*Dudleya stolonifera*) and the federally- and state-listed threatened big-leaved crownbeard (*Verbesina dissita).* Suitable habitat does not exist on site for the Laguna Beach dudleya or Big-leaved crownbeard.

2. Other Special-Status Plant Species

Other special-status plants that been recorded as occurring within the region include: Coulter's matilija poppy (*Romneya coulteri*), intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*), summer holly (*Comarostaphylos diversifolia* ssp. *diversifolia*), western dichondra (*Dichondra occidentalis*), many-stemmed dudleya (*Dudleya multicaulis*), cliff spurge (*Euphorbia misera*), and Fish's milkwort (*Polygala cornuta* var. *fishiae*). Table 3 includes a summary list of the special-status plant species considered in the biological study and their status.

Table 3. Special-Status Plant Species Considered for the Biological Study

Species	Status	Habitat	Occurrence On Site
FEDERALLY OR STATE-LISTED THREATENED OR ENDANGERED SPECIES			
Dudleya stolonifera Laguna Beach dudleya	Federal: FT State: ST CRPR: 1B.1	Chaparral, cismontane woodland, coastal sage scrub, valley and foothill grassland. Occurring on rocky soils.	No suitable habitat within the Study Area.
Verbesina dissita Big-leaved crownbeard	Federal: FT State: ST CRPR: 1B.1	Southern maritime chaparral, coastal sage scrub.	Does not occur on site due to lack of suitable habitat.
OTHER SPECIAL-STATUS PLANTS			
Aphanisma blitoides Aphanisma	Federal: None State: None CRPR: 1B.2	Coastal bluff scrub, coastal dunes, coastal dune scrub.	Does not occur due to lack of suitable habitat.
Atriplex coulteri Coulter's saltbush	Federal: None State: None CRPR: 1B.2	Coastal bluff scrub, coastal dunes, coastal sage scrub, valley and foothill grassland. Occurring on alkaline or clay soils.	Does not occur due to lack of suitable habitat.
Atriplex pacifica South coast saltscale	Federal: None State: None CRPR: 1B.2	Coastal bluff scrub, coastal dunes, coastal sage scrub, playas.	Does not occur due to lack of suitable habitat.

Species	Status	Habitat	Occurrence On Site
Atriplex parishii Parish's brittlescale	Federal: None State: None CRPR: 1B.1	Alkali meadows, vernal pools, chenopod scrub, playas.	Does not occur due to lack of suitable habitat.
Atriplex serenana var. *davidsonii* Davidson's saltscale	Federal: None State: None CRPR: 1B.2	Alkaline soils in coastal sage scrub, coastal bluff scrub.	Does not occur due to lack of suitable habitat.
Calochortus weedii var. *intermedius* Intermediate mariposa lily	Federal: None State: None CRPR: 1B.2	Rocky soils in chaparral, coastal sage scrub, valley and foothill grassland.	Does not occur on site due to lack of suitable habitat.
Chaenactis glabriuscula var. *orcuttiana* Orcutt's pincushion	Federal: None State: None CRPR: 1B.1	Coastal bluff scrub (sandy soils) and coastal dunes.	Does not occur due to lack of suitable habitat.
Comarostaphylos diversifolia ssp. *diversifolia* Summer holly	Federal: None State: None CRPR: 1B.2	Chaparral.	Does not occur on site due to lack of suitable habitat.
Dichondra occidentalis Western dichondra	Federal: None State: None CRPR: 4.2	Coastal sage scrub, chaparral, oak woodland. Often in dry sandy banks in scrub or under trees.	Does not occur on site due to lack of suitable habitat.
Dudleya multicaulis Many-stemmed dudleya	Federal: None State: None CRPR: 1B.2	Chaparral, coastal sage scrub, valley and foothill grassland. Often occurring in clay soils.	Does not occur on site due to lack of suitable habitat.
Euphorbia misera Cliff spurge	Federal: None State: None CRPR: 2B.2	Coastal bluff scrub and coastal sage scrub. Occurring on rocky soils.	Does not occur on site due to lack of suitable habitat.
Horkelia cuneata var. *puberula* Mesa horkelia	Federal: None State: None CRPR: 1B.1	Chaparral, cismontane woodland, and coastal scrub. Occuring on sandy or gravelly soils.	Does not occur due to lack of suitable habitat.
Isocoma menziesii var. *decumbens* Decumbent goldenbush	Federal: None State: None CRPR: 1B.2	Utilizes coastal sage scrub habitat intermixed with grassland, and is more partial to clay soils than other closely related varieties.	Does not occur due to lack of suitable habitat.
Lasthenia glabrata ssp. *coulteri* Coulter's goldfields	Federal: None State: None CRPR: 1B.1	Playas, vernal pools, marshes and swamps (coastal salt).	Does not occur due to lack of suitable habitat.
Nama stenocarpum Mud nama	Federal: None State: None CRPR: 2B.2	Marshes and swamps	Does not occur due to lack of suitable habitat.
Pentachaeta aurea ssp. *allenii* Allen's Pentachaeta	Federal: None State: None CRPR: 1B.1	Valley and foothill grasslands, coastal scrub.	Does not occur due to lack of suitable habitat.
Polygala cornuta var. *fishae* Fish's milkwort	Federal: None State: None CRPR: 4.3	Chaparral, cismontane woodland, riparian woodland.	Potential to occur within the Study Area.
Quercus dumosa	Federal: None	Closed-cone coniferous	Potential to occur

Species	Status	Habitat	Occurrence On Site
Nuttall's scrub oak	State: None CRPR: 1B.1	forest, chaparral, and coastal sage scrub. Occurring on sandy, clay loam soils.	within the Study Area
Romneya coulteri Coulter's matilija poppy	Federal: None State: None CRPR: 4.2	Occurs in chaparral and coastal scrub from 20 to 1,200 meters (66 to 3,940 feet) MSL and is known as a fire follower species.	Does not occur due to lack of suitable habitat.
Suaeda esteroa Estuary seablite	Federal: None State: None CRPR: 1B.2	Coastal salt marsh and swamps. Occurs in sandy soils.	Does not occur due to lack of suitable habitat.

Federal
FE – Federally Endangered
FT – Federally Threatened

State
SE – State Endangered
ST – State Threatened

CRPR
1B – Plants rare, threatened, or endangered in California and elsewhere.
2A - Plants rare, threatened, or endangered in California, but more common elsewhere.
2B – Plants rare, threatened, or endangered in California, but more common elsewhere.
3 – Plants about which more information is needed.
4 – Plants of limited distribution (a watch list).

Threat Code Extension
.1 – Seriously endangered in California (over 80% occurrences threatened)
.2 – Fairly endangered in California (20-80% occurrences threatened)
.3 – Not very endangered in California (<20% of occurrences threatened or no current threats known)

C. Special-Status Habitats

A review of the March 2014 CNDDB identified the following special-status habitats as occurring within the USGS Laguna Beach quadrangle: southern coast live oak riparian forest, southern sycamore alder riparian woodland, and valley needlegrass grassland. The Study Area does not contain these special-status habitats.

D. Wildlife Movement

Areas to the north of the Project Site supports limited wildlife movement as a result of steep topography and surrounding existing development. Species observed utilizing or moving through the site included raccoon (*Procyon lotor*) [tracks], coyote (*Canis latrans*) [tracks and scat], and mule deer (*Odocoileus hemionus*). Movement on the site appears to be limited to low-lying canyon bottoms and is not likely to occur in residential development. Additionally, movement to and from the site to adjacent open space areas is inhibited by dense, existing residential development and the associated roads. Very limited potential exists for wildlife movement into the site from the adjacent open space, however, due to the insularity of the site, it does not function as a wildlife corridor. As such, wildlife movement would not be significantly affected by proposed fuel modification activities.

E. Soil Mapping

The NRCS has mapped the below soil types as occurring in the general vicinity of the Project Site. A soils map is attached as Exhibit 5.

Soper Gravelly Loam, 30 to 50 Percent Slopes

The soils of the Soper series are moderately deep, well-drained soils that formed in material weathered from conglomerate and sandstone. They are found on hills and uplands at elevations of 100 to 2,500 feet. The texture is that of gravelly loam to gravelly clay loam with rapid runoff and moderately slow permeability. Soper soils have a moderate extent and are found in foothill areas in the western part of southern and central California.
None of the soil units referenced above are identified as hydric in the SCS's publication, Hydric Soils of the United States[5].

F. Jurisdictional Waters

The Study Area contains no aquatic features potentially subject to the jurisdiction of the Corps, RWQCB, CDFW, and or CCC.

G. High Value Habitat

As depicted in Exhibit 4, a portion of the Study Area is mapped by the City of Laguna Beach as "High Value Habitat". Specifically, the Sumac-Toyon Southern Mixed habitat with lemonade berry, toyon, fuel modification/disturbed, and giant wildrye, is within the high value habitat area and will be impacted. These areas cover a total of approximately 0.089 acres of the areas mapped as high value habitat occurring within the proposed site and fuel modification area, as depicted in Table 4 below.

Table 4. High Value Habitat Acres

Vegetation Type	**Acres**
Fuel Modification Zone/Disturbed	0.002
Giant Wildrye	0.002
Lemonade Berry	0.081
Toyon	0.004
Total	**0.089**

Two areas within those mapped as High Value Habitat do not exhibit characteristics associated with High Value Habitat; primarily the area covered by myoporum and the fuel modification zone/disturbed area. These area does not support a high diversity of plant species nor does it

[5] United States Department of Agriculture, Soil Conservation Service. 1991. Hydric Soils of the United States, 3rd Edition, Miscellaneous Publication Number 1491. (In cooperation with the National Technical Committee for Hydric Soils.)

facilitate wildlife movement, because it is occupied by non-native and/or ornamental plant species and occurs at the urban interface, which already serves to limit wildlife movement and dispersal. Nonetheless, between the construction and fuel modification zone the entire area will be impacted.

VII. PROJECT-RELATED IMPACTS

A. Discussion of Impacts Considered in Accordance with the California Environmental Quality Act (CEQA)

1. Thresholds of Significance

Environmental impacts relative to biological resources are assessed using impact significance threshold criteria, which reflect the policy statement contained in CEQA, Section 21001(c) of the California Public Resources Code. Accordingly, the State Legislature has established it to be the policy of the State of California:

> *"Prevent the elimination of fish or wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities..."*

Determining whether a project may have a significant effect, or impact, plays a critical role in the CEQA process. According to CEQA, Section 15064.7 (Thresholds of Significance), each public agency is encouraged to develop and adopt (by ordinance, resolution, rule, or regulation) thresholds of significance that the agency uses in the determination of the significance of environmental effects. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant. In the development of thresholds of significance for impacts to biological resources CEQA provides guidance primarily in Section 15065, Mandatory Findings of Significance, and the CEQA Guidelines, Appendix G, Environmental Checklist Form. Section 15065(a) states that a project may have a significant effect where:

> *"The project has 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 wildlife community, reduce the number or restrict the range of an endangered, rare, or threatened species, ..."*

Therefore, for the purpose of this analysis, impacts to biological resources are considered potentially significant (before considering offsetting mitigation measures) if one or more of the following criteria discussed below would result from implementation of the proposed activities.

2. Criteria for Determining Significance Pursuant to CEQA

Appendix G of the 1998 State CEQA guidelines indicate that a project may be deemed to have a significant effect on the environment if the project is likely to:

> *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 Game 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, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service (including protections provided pursuant to Section 1600 et seq.).*
>
> *c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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.*

3. Direct and Indirect Impacts Defined

The following discussion examines the potential impacts to plant and wildlife resources that may be anticipated to occur as a result of implementation of the proposed fuel modification zones. Project-related impacts can occur in two forms, direct and indirect. Direct impacts are considered to be those that involve the loss, modification or disturbance of natural habitats (i.e., plant communities), which in turn, directly affect the flora and fauna associated with those habitats. Direct impacts also include the destruction of individual plants or wildlife, which can also directly affect regional populations or result in the physical isolation of populations, potentially reducing genetic diversity and population stability.

Indirect impacts involve the harmful effects associated with increases in ambient levels of noise or light, introduction of unnatural predators (i.e., domestic cats and other non-native animals),

competition from exotic plants and animals, increased levels of human disturbance associated with human incursions from hiking, mountain biking and changes in fire regimes. Indirect impacts may be associated with the day-to-day activities associated with project build-out, such as increased traffic use, permanent concrete barrier walls or chain-link fences that restrict wildlife movement, exotic ornamental plantings that provide a local source of seed of invasive plants, etc., which may be both short-term and long-term in their duration. These impacts are commonly referred to as "edge effects" and may result in a slow replacement of native plants by exotics, and changes in the behavioral patterns of wildlife and reduced wildlife diversity and abundance in habitats adjacent to project sites.

Potentially significant effects, either directly through habitat loss or modifications, or indirectly due to edge effects on any endangered or threatened species, or any other special-status plant, animal, or habitat that could occur as a result of the project are discussed below.

A. Impacts to Native Vegetation

The total area subject to and vegetation/land use types impacted by construction and fuel modification covers 0.184 acres. Proposed impacts to lemonade berry total approximately 0.133 acre. Proposed impacts to toyon total approximately 0.005 acre. Proposed impacts to giant wildrye total approximately 0.002 acre. Portions of the lemonade berry, toyon, and giant wildrye occur within areas mapped as high value habitat as depicted on Exhibit 3.

While fuel modification activities will result in the thinning of the vegetation canopy, fuel modification activities will not result in impacts to special-status plants or native shrubs that are identified as providing habitat conditions required by special-status species, such as big-leaved crownbeard. Therefore, with the mitigation measures implemented as discussed below, fuel modification activities will not result in impacts to special-status species.

B. Impacts to Special-Status Animals

No special-status animals were observed within the site and none are expected to occur.

C. Impacts to Special-Status Plants

No Special-Status plants were observed and there is no suitable habitat for special status plants.

D. Impacts to Special-Status Habitats

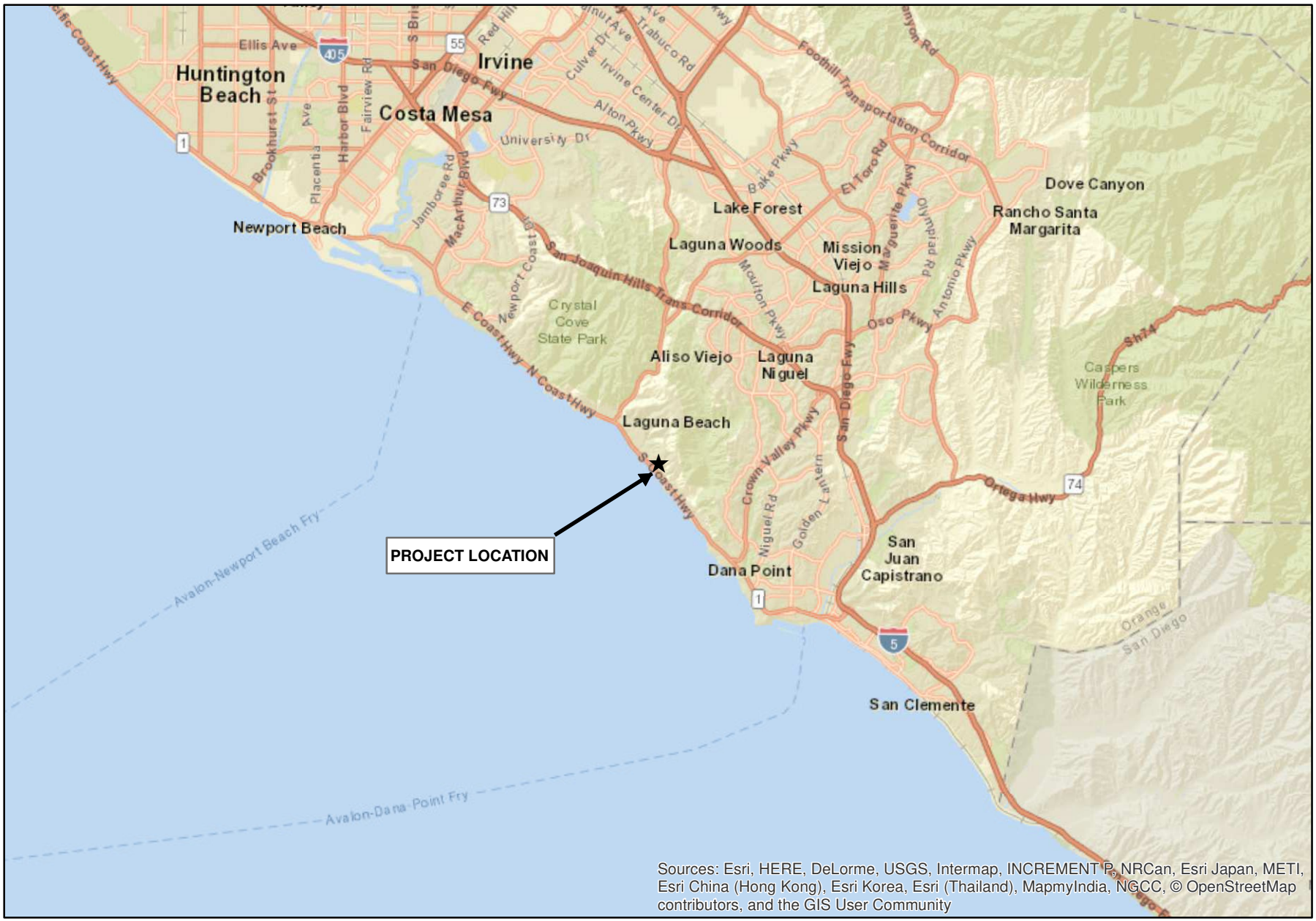
There are no impacts to Special-Status Habitats.

VIII. MITIGATION MEASURES

No special-status wildlife species were detected. The only mitigation needed will be for nesting birds found on the site. The following measures are recommended to minimize impacts within

special-status habitats:

- To avoid impacts to nesting and migratory birds it is recommended that any removal or clearing of vegetation be conducted outside of the breeding season, which extends from February 1 to August 31. If seasonal conditions promote a high risk for wildfires, work may occur during the breeding season if a qualified biologist conducts a survey for nesting birds within 48 hours prior to the commencement of fuel modification activities in the area, and ensures that no active nests are affected.



Source: ESRI World Street Map

N

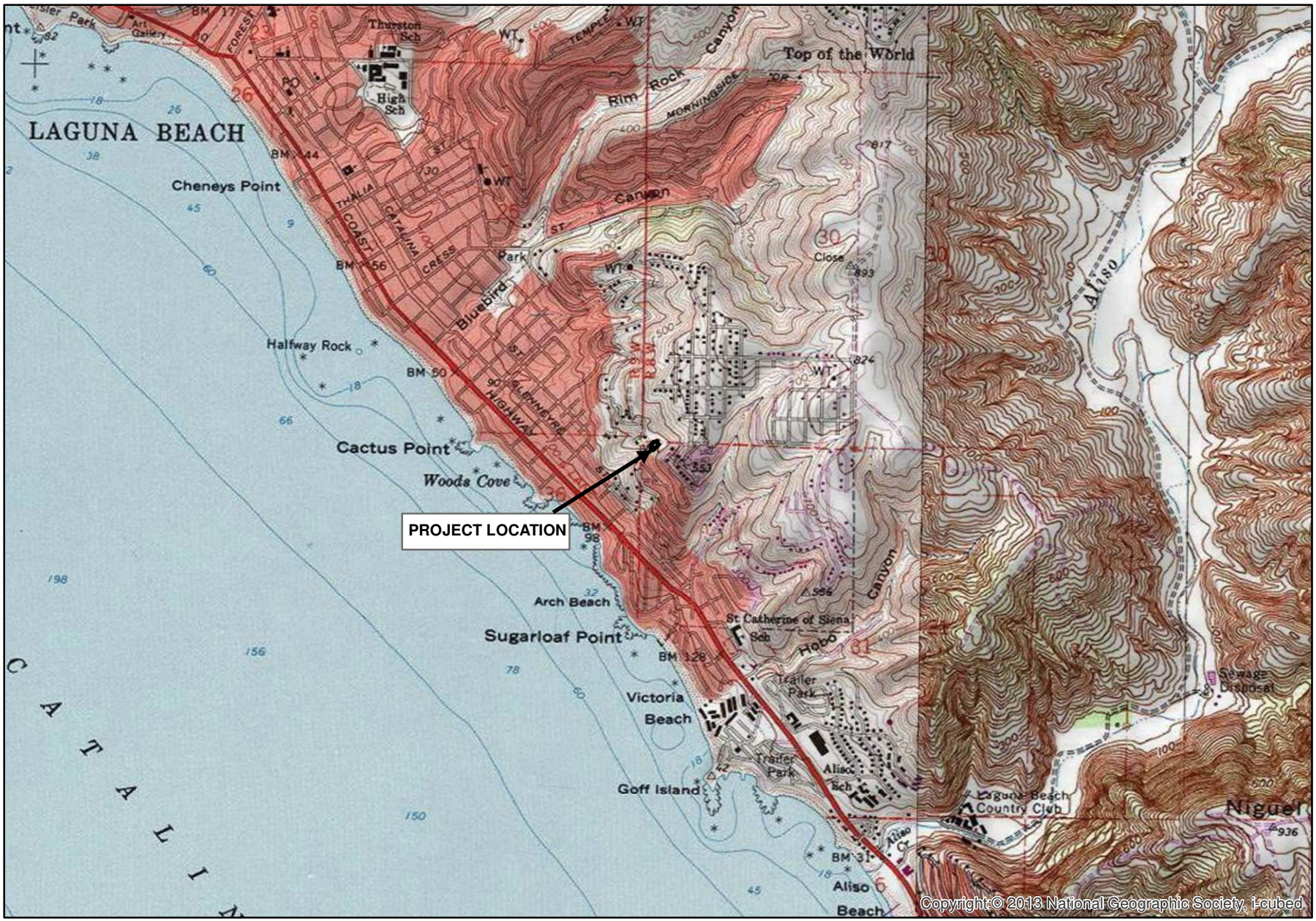
0 2 4 8 Miles

2400 JUANITA WAY

Regional Map

GLENN LUKOS ASSOCIATES

Exhibit 1



Adapted from USGS Laguna Beach, CA quadrangle

N

0 1,000 2,000 4,000 Feet

2400 JUANITA WAY

Vicinity Map

GLENN LUKOS ASSOCIATES

Exhibit 2



- Project Boundary
- Fuel Mod Zone/Disturbed
- Giant Wildrye
- Iceplant
- Lemonade Berry
- Myoporum
- Ornamental
- Toyon

N

0 15 30 60

Feet

1 inch = 30 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: C. Lukos, GLA
Date Prepared: October 16, 2017

2400 JUANITA WAY

Vegetation Map

GLENN LUKOS ASSOCIATES

Exhibit 3

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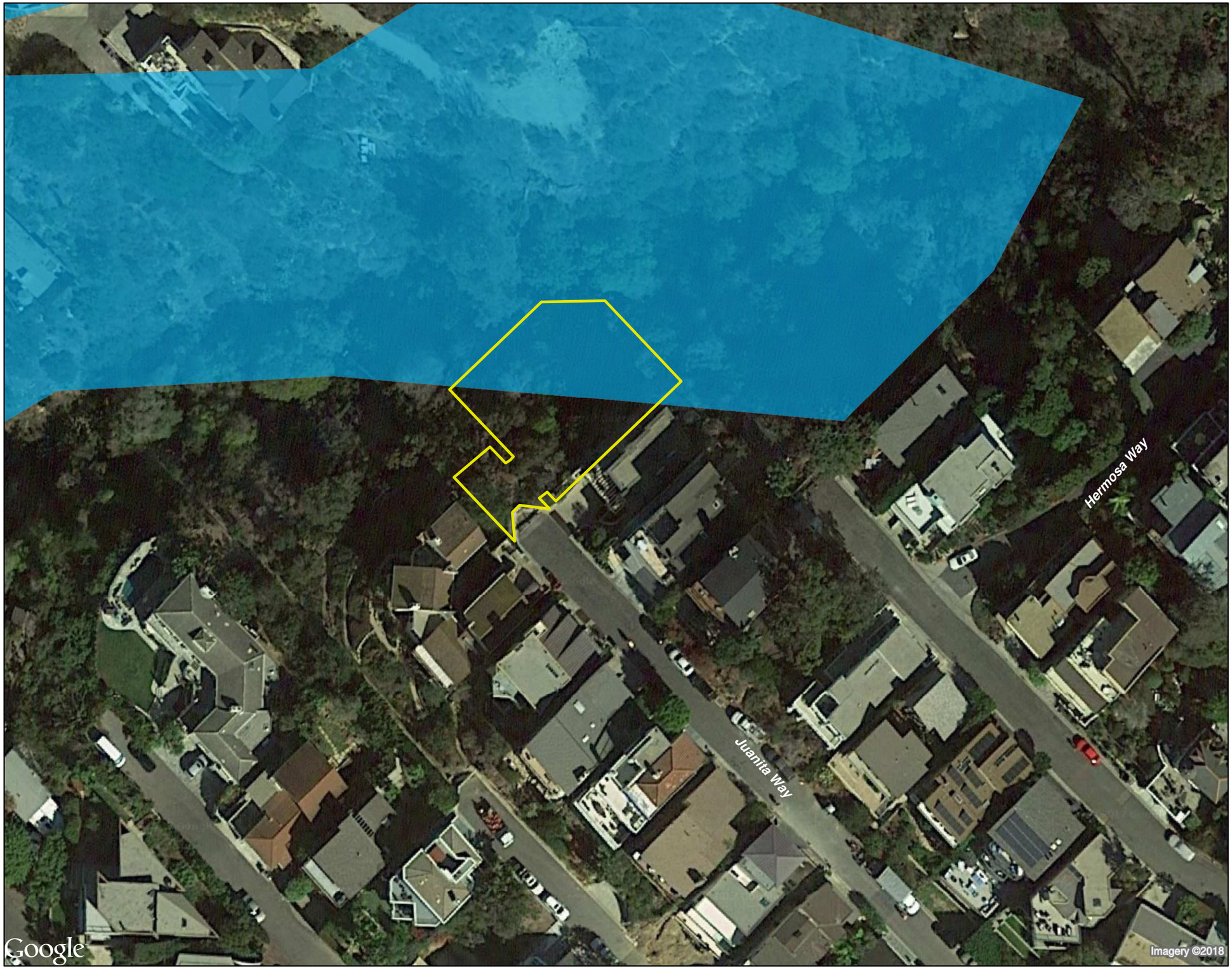


Project Boundary

High Value Habitat

N

0 25 50 100

Feet

1 inch = 50 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: C. Lukos, GLA
Date Prepared: October 16, 2017

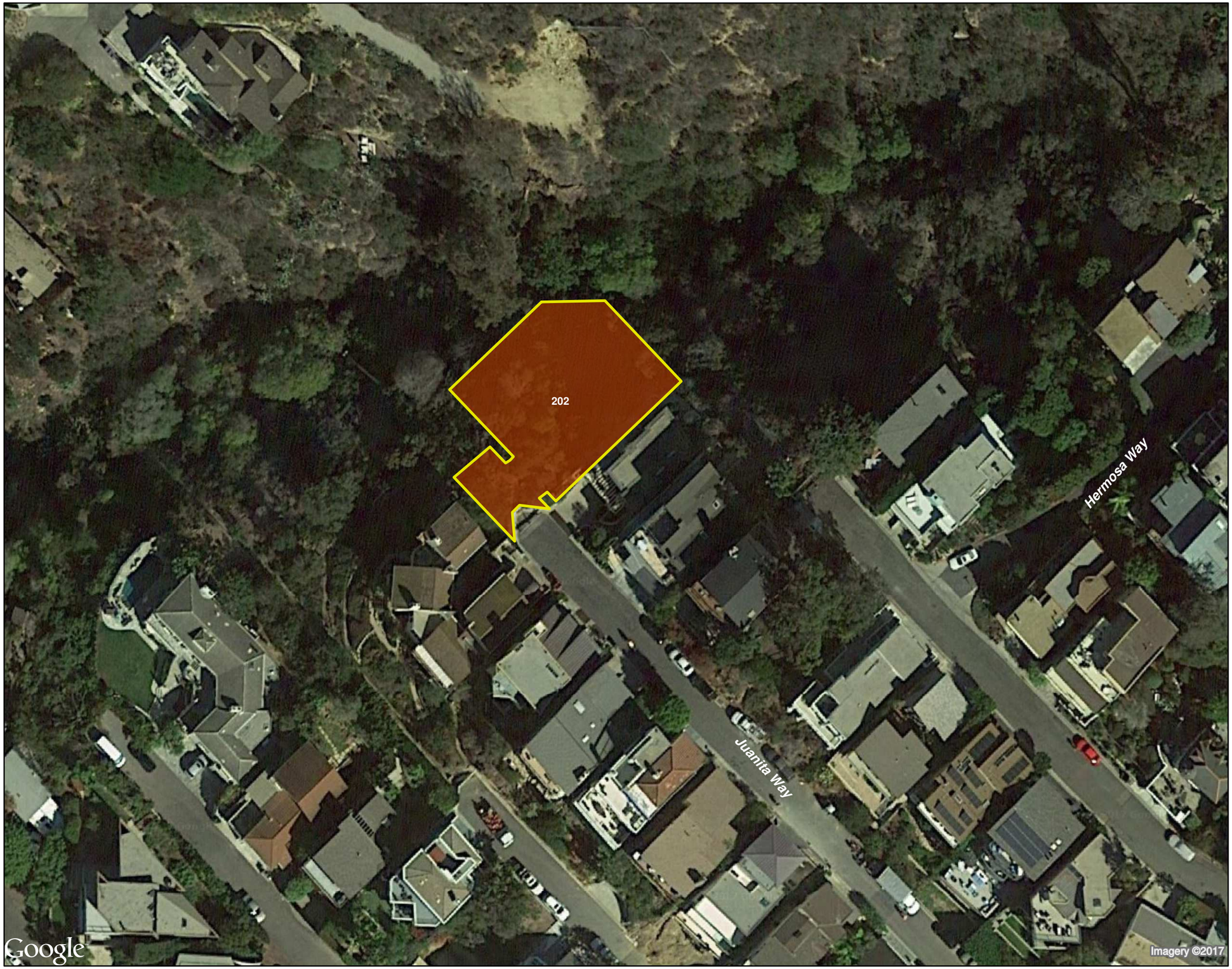
2400 JUANITA WAY

Aerial Site Map with High Value Habitats

GLENN LUKOS ASSOCIATES

Exhibit 4

X:\1100 AFTER THE REST\1294-01JUAN\1294-1GIS\1294-1AerialLayout.mxd



Project Boundary

202 - SOPER GRAVELLY LOAM, 30 TO 50 PERCENT SLOPES

N

0 25 50 100

Feet

1 inch = 50 feet

Coordinate System: State Plane 6 NAD 83
Projection: Lambert Conformal Conic
Datum: NAD83
Map Prepared by: C. Lukos, GLA
Date Prepared: October 16, 2017

2400 JUANITA WAY

Soils Map

GLENN LUKOS ASSOCIATES

Exhibit 5

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