

Evaluation of Environmental Impacts

1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Sources	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?	1, 2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Less Than Significant Impact. The proposed project site (FMZ 20 and FMZ 21) would be in an area with low to medium development and on the wildland-urban interface of a heavily vegetated landscape. The City of Laguna Beach’s Landscape and Scenic Highways Element in its General Plan indicates that the concept of a “scenic” vista is based on the visibility of a natural landscape as viewed by travelers, the visual quality, and the extent to which development does not intrude upon the traveler’s enjoyment of the view. The proposed project would be located primarily near residential areas and public and institutional facilities and would not be highly visible to travelers from Coast Highway. Limited areas of the southwest-oriented portion of FMZ 20 would be partially visible from Coast Highway, particularly at the intersection of Coast Highway and West Street. However, the majority of views would be obscured due to topography, houses, and trees adjacent to Coast Highway. Furthermore, a large portion of FMZ 20 at this location would consist of a blue-line stream (i.e., a waterbody such as a creek or stream) buffer, which would be limited to only non-native plant removal (with certain case-by-case exceptions such as removal of excessive dead plant matter and rubbish). The proposed project would have no significant impact on the topography of the hillsides within the FMZs. The fuel management activities would completely or partially remove vegetation depending on species composition, topography, and presence of cultural resources. Sensitive native vegetation would be limited to a reduction of up to 50 percent within the FMZs and follow requirements as outlined in the City’s <i>Treatment Protocols for Fuel Modification Zones Subject to Coastal Development Permitting</i> (i.e., Treatment Protocols). The project would minimize impacts on sensitive species and habitats by avoiding removal in certain areas as determined by a biologist. Risk of erosion would be minimized, as 50 percent or more of existing native vegetative cover would be kept in the FMZs, and post-treatment erosion control measures would be implemented. Therefore, the proposed project would not adversely impact the surrounding natural landscape and scenic vista.</p>					
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Less Than Significant Impact. The proposed project site is located between approximately 180 feet (0.03 mile) and 0.3 mile away from Coast Highway, the nearest eligible State scenic highway. The County describes Coast Highway as a Viewscape Corridor in its Scenic Highway Plan and identifies this road as a valuable visual resource. The FMZs are generally located along the outer northern and eastern edges of residences, the South Coast Water District office and reservoir, and Mission Hospital Laguna Beach. The FMZs would predominantly be located behind and obscured by the topography, houses, and trees, and therefore would be generally hidden from major public views from Coast Highway. Given that the proposed project would not be within the viewshed of a designated State scenic highway, and the minimal visibility of the FMZs from Coast Highway, there would be a less than significant impact on scenic resources.</p>					
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Less Than Significant Impact. Fuel modification activities would occur on the wildland-urban interface of predominantly residential and public and institutional properties. Public views of FMZ 20 would be accessed along the Valido Trail in Aliso and Wood Canyons Wilderness Park, and views of both FMZs would be accessible from residential roads. Although the majority of FMZ 20 would be located within Aliso and Wood Canyons Wilderness Park and includes Valido Trail, public views of fuel modification activities would be insubstantial. Fuel modification activities would only prune dead and dying branches from native trees, and 50 percent or more of existing native vegetation would remain, so public views from Valido Trail would not be substantially degraded. Visibility from public viewing points along the residential roads would be limited, as there are homes and trees that would obscure visibility of the fuel breaks. Public views of the project area are expected to be insubstantial as project activities would be implemented using hand crews only, and equipment would be limited to hand tools and trucks over a temporary period. Therefore, fuel modification activities would not degrade public views of the site and its surroundings, and the proposed project would have a less than significant impact.</p>					

1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The proposed project would not introduce any lighting elements or materials that would create a new source of substantial light or glare. Fuel modification activities would occur during the day, and no nighttime activities would occur. Therefore, the proposed project would have no impact.

2. AGRICULTURE AND FORESTRY 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:**

	Sources	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 non-agricultural use?	3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. According to the California Resources Agency's Farmland Mapping and Monitoring Program, the proposed project does not lie within Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and therefore would not convert this farmland to non-agricultural use. The Orange County Important Farmland map depicts the location of FMZ 20 and FMZ 21 as "urban and built-up land" and "other land" (low density rural developments not suitable for agricultural activities). The proposed project would have no impact on Farmland.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project would not be located within an agricultural zone or Williamson Act parcel, so it would not conflict with existing zoning for an agricultural use or a Williamson Act contract. Therefore, the proposed project would have no impact.

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))?	4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project would traverse the following City-designated land use zones: Open Space/Conservation, Residential/Hillside Protection, Residential Low Density, and Institutional Zones. None of the areas within the project site are zoned for forest land, timberland, or Timberland Production. The proposed activities would have no impact on forest land or timberland or cause rezoning of these lands.

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| d. Result in the loss of forest land or conversion of forest land to non-forest use? | 4 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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No Impact. Since the proposed project would not occur within forest land, it would not result in the loss of forest land or convert forest land to non-forest use. The proposed project would have no impact on existing forest land.

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| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | 4 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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No Impact. Because the project site would not occur within or in proximity to zoned farmland or forest land, it would neither convert Farmland to non-agricultural use nor convert forest land to non-forest use. The proposed project would have no impact on Farmland or forest land.

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.
Would the project:

	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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| a. Conflict with or obstruct implementation of the applicable air quality plan? | 2, 5 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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No Impact. The proposed project’s emissions sources (on-road vehicles, chainsaws, a woodchipper) would comply with State and local emissions regulations included in the currently approved South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). Additionally, the proposed project does not change any land use or growth assumptions forecast by SCAQMD and the Southern California Association of Governments (SCAG) in the AQMP. Additionally, the proposed project is consistent with the City of Laguna Beach General Plan’s growth projection since it would not change any development density or population assumptions. As such, the proposed project’s initial and ongoing fuel modification activities are consistent with the AQMP emission source estimate assumptions and consistent with the AQMP and local planning land use/growth assumptions, so it is considered consistent with the SCAQMD’s AQMP. No impact would occur.

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| b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard? | 6 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Less Than Significant Impact. Applicable thresholds of significance are the SCAQMD regional air quality emissions thresholds. These are daily emissions thresholds, which for a “construction” project like the proposed project range from a low of 55 pounds per day for fine particulate matter (PM2.5) to a high of 550 pounds per day for Carbon Monoxide (CO). The proposed project involves hand cutting to clear vegetation in defined areas. The hand cutting and clearing would use gasoline fueled chainsaws, as many as six operating per day, a gas- or diesel-powered woodchipper, brush-cutters, and other hand tools. The proposed project would also include employee commuting trips and small and large truck trips to haul waste and supplies. The scale of use for these small off-road equipment items (e.g. woodchipper) and daily vehicle trips would not have the potential to produce emissions near the SCAQMD regional emissions thresholds. The worst-case daily emissions¹ are estimated (see Appendix B) and compared to the SCAQMD thresholds in Table 4. As shown, daily emissions would be below the SCAQMD thresholds and therefore less than significant.

¹ The maximum daily emissions are estimated with the following conservative assumptions: Six 5.5 horsepower (HP) California Air Resources Board (CARB) spark-engine emissions factor-compliant gasoline powered chainsaws operating 8 hours per day, one 81 HP diesel-fueled woodchipper operating 8 hours per day, 554 Vehicle Miles Traveled (VMT)/day of passenger vehicle use, 32 vehicle miles traveled (VMT)/day of medium sized truck use, and 40 VMT/day of heavy truck use. Sulfur Oxide (SOx) emissions are not estimated as they are negligible given CARB fuel sulfur content regulations.

3. **AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**

Sources Potentially Significant Impact Less Than Significant With Mitigation Incorporated Less Than Significant Impact No Impact

Table 4. Maximum Daily Emissions (lbs/day)

	VOC	CO	NO _x	PM10	PM2.5
Chainsaws	31.25	232.64	31.25	0.87	0.87
CalEEMod/On-Road Vehicles & Woodchipper	0.41	3.70	2.61	0.58	0.23
Total	31.66	236.34	33.86	1.45	1.10
SCAQMD Regional Significance Thresholds	75	550	100	150	55
Significant?	NO	NO	NO	NO	NO

Acronyms: VOC = volatile organic compounds; CO = Carbon Monoxide; NO_x = Nitrogen Oxides; PM10 = Particulate Matter of diameter 10 micrometers or less; PM2.5 = Fine Particulate Matter of diameter less than 2.5 micrometers.

Note: VOC and NO_x emissions factor for spark ignition engines (chainsaws) is based on a combined not to exceed value. To be conservative, both are assumed to be at the upper limit, but for gasoline-fueled engines the emissions will be primarily VOC emissions.

The proposed project is also required to comply with applicable rules and regulations, such as SCAQMD Rule 403 – Fugitive Dust, that requires control of fugitive dust causing activities. However, grading, or other major earth-moving activities and unpaved road travel is unlikely to occur, so fugitive dust emissions would be negligible and there would be no need for fugitive dust control mitigation measures, and impacts would be less than significant. In the unlikely event that off-road vehicle use would occur, vehicles would likely travel short distances over natural ground cover vegetated areas to gather cut vegetation wastes. Fugitive dust impacts would remain less than significant because the vegetated ground cover would reduce dust emissions. However, off-road vehicle use is unlikely because the majority of the project site is not suitable for off-road vehicle use due to difficulty of access (i.e., there are no direct vehicle access points to the FMZs and steep slopes would prevent vehicle use). Similarly, impacts during ongoing annual fuel modification activities, which involve a much lower level of activity than the initial fuel modification activities, would be below the SCAQMD thresholds and impacts would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations? 6

Less Than Significant Impact. The project site is adjacent to sensitive receptors, specifically residential uses. Air pollutant emissions generated by construction activities are anticipated to cause temporary increases in local air pollutant concentrations. However, the construction equipment (e.g., chainsaws and woodchipper) used during hand clearing would generate minimal emissions, and the emissions levels are not anticipated to exceed the SCAQMD’s screening level localized significance thresholds (LST). In fact, the maximum daily emissions estimate including on-road emissions which are not localized emissions would be below the SCAQMD LSTs, when compared to the most conservative LST table assumptions for the proposed project (1-acre daily working area within the project site area that could be within 25 meters of a sensitive receptor) as shown in Table 5 (see Appendix B).

Table 5. Maximum Daily Emissions (lbs/day)

	CO	NO _x	PM10	PM2.5
Chainsaws	232.64	31.25	0.87	0.87
CalEEMod/On-Road Vehicles & Woodchipper	3.70	2.61	0.58	0.23
Total	236.34	33.86	1.45	1.10
SCAQMD Localized Significance Thresholds	647	92	4	3
Significant?	NO	NO	NO	NO

Notes: Thresholds are for SRA 20 (Central Orange County Coastal). VOC does not have a LST. Emissions are total daily emissions; the localized maximum daily emissions would be lower.

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.
Would the project:

	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The quantity of toxic air contaminant (TAC) emissions from proposed project emissions sources, given the quantity and short duration of the proposed project's TAC emissions, are similarly minor in the context of the SCAQMD TAC significance thresholds. Given the low localized emissions potential for the proposed project, impacts would be less than significant.					
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact. The proposed project would not emit objectionable odors that would affect a substantial number of people. The proposed project would include emissions from construction equipment (e.g., chainsaws and woodchipper) that may generate minor odors; however, these odors would not be highly objectionable near the source, would dissipate quickly, and would be temporary. Therefore, the proposed project's odor sources would not affect a substantial number of people. A small amount of nuisance dust emissions would be generated by the proposed project, but these emissions would be minor; limited to dust kicked up by workers and in unlikely cases, short occasional vehicle trips over vegetated areas. Additionally, the proposed project would be required to comply with the SCAQMD Rule 402, Nuisance. Therefore, objectionable odors and other nuisance emissions would not adversely affect a substantial number of people, so impacts would be less than significant.

4. BIOLOGICAL RESOURCES. Would the project:

	Sources	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 Wildlife or U.S. Fish and Wildlife Service?	7, 8	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact With Mitigation Incorporated. A biological resources report was prepared in 2021 for the proposed project (GLA, 2021a – see Biological Technical Report in Appendix C). This report included a literature review of biological resources known from the area and field surveys to assess the habitat for these species and to search for special-status species, map jurisdictional drainages, and map vegetation. During the surveys, one State and federally listed species, big-leaved crownbeard (*Verbesina dissita*), was identified within the project site. The proposed project has been modified with exclusion areas (see Table 3) to avoid any potential impacts to big-leaved crownbeard. California gnatcatcher (*Polioptila californica californica*), which is federally listed, was also determined to have potential to occur in coastal sage scrub habitat in or adjacent to the project site (GLA, 2021b – see Coastal California Gnatcatcher letter report in Appendix C). Impacts to any of these species including harass, harm, pursue, wound, or kill would be significant, and without mitigation the proposed project would have the potential to “take” these species. With implementation of Mitigation Measures BIO-1 (designation of a Project Biologist), BIO-2 (pre-construction survey for special-status species), BIO-3 (nesting bird avoidance), BIO-4 (biological monitoring), and BIO-5 (environmental training), impacts to these species, including “take” would be avoided and reduced to a less-than-significant level. Furthermore, habitat for both these species is abundant throughout the vicinity of the project site and removal or thinning of a limited amount of suitable habitat would therefore be negligible.

Several additional special-status plants have a potential to be present including Coulter's matilija poppy (*Romneya coulteri*), Catalina mariposa lily (*Calochortus catalinae*), intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*), Palmer's grapplinghook (*Harpagonella palmeri*), western dichondra (*Dichondra occidentalis*), cliff spurge (*Euphorbia misera*). None of these were detected during focused surveys in 2021.

Intermediate mariposa-lily has a California Rare Plant Rank (CRPR) of 1B which indicates these plants are rare, threatened, or endangered in California and impacts to these species may be significant. Cliff spurge has a CRPR of 2B.2 which indicates these plants are rare, threatened, or endangered in California but may be common elsewhere and impacts to these species may be significant. Mitigation Measures BIO-1 (designation of a Project Biologist), BIO-2 (pre-construction survey for special-status species), BIO-4 (biological monitoring), and BIO-5 (environmental training), would reduce the impact to these species to a less-than-significant level. Impacts would be avoided by (1) requiring a pre-construction clearance survey for special-

4. BIOLOGICAL RESOURCES. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>status species, (2) identifying buffer areas around any special-status biological resources within or near the project site, and (3) conducting biological monitoring and environmental training.</p>					
<p>Catalina mariposa lily, Coulter’s matilija poppy, Palmer’s grapplehook, and Western dichondra all have a CRPR of 4, which indicates that these species have a limited range but are not considered to be rare, threatened, or endangered in California. As such, impacts to these species are not expected to be significant and no mitigation is required. No special-status wildlife species were found within the Project Site during the surveys. Several species, as noted in Table 3 (GLA, 2021a – see Biological Technical Report in Appendix C), have varying degrees of potential to be present and include American badger (<i>Taxidea taxus</i>), California glossy snake (<i>Arizona elegans occidentalis</i>), coast horned lizard (<i>Phrynosoma blainvillii</i>), coast patch-nosed snake (<i>Salvadora hexalepis virgulata</i>), coastal cactus wren (<i>Campylorhynchus brunneicapillus sandiegensis</i>), coastal whiptail (<i>Aspidoscelis tigris stejnegeri</i>), Cooper’s hawk (<i>Accipiter cooperii</i>), grasshopper sparrow (<i>Ammodramus savannarum</i>), orange-throated whiptail (<i>Aspidoscelis hyperythrus</i>), San Diego desert woodrat (<i>Neotoma lepida intermedia</i>), and Southern California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>).</p>					
<p>Many of these species are State Species of Special Concern as designated by the California Department of Fish and Wildlife (CDFW). Impacts to these species may be significant and could include harass, harm, pursue, wound, or kill. With implementation of Mitigation Measures (MM) BIO-1 (designation of a Project Biologist), BIO-2 (pre-construction survey for special-status species), BIO-3 (nesting bird avoidance), BIO-4 (biological monitoring), and BIO-5 (environmental training), impacts to these species would be reduced to a less-than-significant level. Impacts would be avoided by (1) avoiding nesting season if possible, (2) requiring a pre-construction clearance survey for special-status species, (3) requiring a pre-construction clearance surveys during bird nesting season, (4) identifying buffer areas around any bird nest or special-status biological resources within or near the project site, and (5) conducting environmental training.</p>					
<p>The federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503, 3503.5, and 3513 prohibit take of migratory birds, including eggs or active nests, except as permitted by regulation (e.g., licensed hunting). Mitigation Measures BIO-1 (designation of a Project Biologist), BIO-3 (nesting bird avoidance), BIO-4 (biological monitoring), and BIO-5 (environmental training), would avoid potential “take” or other adverse impacts to nesting birds by (1) avoiding nesting season if possible, (2) requiring a pre-construction clearance surveys during bird nesting season, (3) identifying buffer areas around any bird nest within or near the project site, and (4) conducting environmental training.</p>					
Mitigation Measures					
<p>BIO-1 The City of Laguna Beach (City) shall assign a qualified biologist to the project (i.e., Project Biologist). The qualified biologist shall be responsible for conducting pre-construction surveys (MM BIO-2), implementing nesting bird avoidance (MM BIO-3), monitoring project activities (MM BIO-4), and conducting worker training (MM BIO-5). The "qualified biologist" is defined as a person with appropriate education, training, and experience to conduct the required surveys, monitor project activities, provide worker education programs, and supervise or perform other monitoring-related actions. The Project Biologist shall be authorized by the City to temporarily halt project activities, if needed, to prevent take of listed species or harm to any other special-status species.</p>					
<p>BIO-2 Prior to start of project activities, the Project Biologist shall survey the work area to determine if any special-status species are present. During the survey, the Project Biologist shall search for nesting birds, special-status plants, and other special-status species. Pre-clearing surveys shall be performed during the appropriate blooming period for special-status plants to ensure species present are identified. Any special-status species or sensitive resources shall be flagged and avoided, in coordination with the Project Biologist. If big-leaved crownbeard are located within the project site, they shall be flagged, and a 50-foot buffer installed. Plants with a CRPR of 1B or 2B shall be flagged and a 15-foot buffer installed. Any willow canopy that falls outside the 25-foot buffer around “blue-line” drainages (per the City’s Treatment Protocols), shall be avoided. San Diego desert woodrat nests shall be avoided with a 15-foot buffer. No work shall be permitted within these buffers. The Project Biologist shall also flag coast live oak seedlings and western sycamore seedlings for avoidance, as feasible. The Project Biologist shall also search for shot hole borers on all oak and sycamore trees that are proposed for pruning. If shot hole borers are found, the Project Biologist shall notify the City who will then coordinate with OC Parks, CDFW, and the U.S. Fish and Wildlife Service. All pruning tools shall be cleaned and disinfected prior to use within the project area and at least weekly during the project to further reduce the spread of pathogens. To the extent practicable, thinning within coastal sage scrub and chaparral habitats shall be limited to winter months outside the growing season.</p>					
<p>BIO-3 Vegetation removal and initial ground disturbance shall be completed outside the breeding season (i.e., no removal of potential nesting habitat from January 1 through September 1), or after a pre-construction nesting bird survey has been completed. The Project Biologist shall confirm that no birds are nesting in or adjacent to areas to be disturbed. If native birds are nesting on the site, then project activities shall be postponed until nesting is completed or the Project Biologist shall</p>					

	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>4. BIOLOGICAL RESOURCES. Would the project:</p> <p>designate appropriate avoidance buffers around nests to protect nesting birds. No project related disturbance shall be allowed within these buffers.</p> <p>BIO-4 The Project Biologist shall be present on the project site during vegetation clearing done by hand crews to document compliance with the avoidance and minimization measures and to provide guidance in avoiding or minimizing impacts to biological resources. The Project Biologist shall also conduct quarterly monitoring of the project site for 12-months after the completion of the fuel treatment. During this post-treatment monitoring the Project Biologist shall inspect the mulched plant material for Argentine ants and will also note wildlife use of the treatment areas. If Argentine ants are found within the mulched plant material, the City shall implement an ant control program to remove them from these areas. If any new non-native plants are found within the project area, the City shall implement a control program for these species to ensure they are eradicated and not allowed to spread into adjacent natural lands.</p> <p>BIO-5 The Project Biologist shall conduct training to ensure that all workers on the project site are aware of all applicable mitigation measures for biological resources. Specifically, workers shall be required to (1) limit all activities to approved work areas; (2) report any special-status species; (3) report any bird nests; (4) avoid contact with any wildlife that may approach a work area, and be aware of potential venomous reptile bites from carelessness or unnecessary harassment; (5) pick up and properly dispose of any food, trash, or construction refuse; and (6) report any spilled materials (e.g., oil, fuel, solvent, engine coolant, raw concrete, or other material potentially hazardous to wildlife) to the supervisor. During the training, the Project Biologist shall briefly discuss special-status species that may occur in the work areas, their habitats, and requirements to avoid or minimize impacts. In addition, all workers shall be informed of civil and criminal penalties for violations of the federal Endangered Species Act, California Endangered Species Act, and the Migratory Bird Treaty Act.</p>					
<p>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 Wildlife or U.S. Fish and Wildlife Service?</p>		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact. Impacts to native vegetation would focus on the removal of non-native species and dead or dying material to achieve a threshold of no more than fifty-percent vegetative cover, as specified in the City’s Treatment Protocols. The project site includes a significant drainage course near the west end of FMZ 20, which consists of approximately 0.24 acre of Goodding’s Willow – Red Willow Riparian Woodland (*Salix gooddingii* – *Salix laevigata* Woodland) and has a State Rank of S3; therefore, impacts may be significant. In accordance with the Treatment Protocols, a 25-foot buffer on either side of any “blue-line” ephemeral drainages or stream courses crossing the treatment area would be established. In addition, any willow canopy that falls outside of the 25-foot buffer would also be avoided (MM BIO-2). There is no riparian habitat within FMZ 21, therefore, there would be no impacts to riparian habitat including special-status riparian habitat associated with the proposed project.

The proposed project would also result in direct impact to approximately 3.47 acres of Lemonade Berry Scrub (*Rhus integrifolia* Shrubland Alliance) which has a State Rank of S3 and impacts may be significant. Per the City’s Treatment Protocols, impacts to areas of chaparral habitat, including Lemonade Berry Scrub, would not have more than 50-percent of the vegetation removed in accordance with the hierarchy developed for the fuel modification program (Appendix A). Specifically, vegetation thinning would remove all non-native species first and then have additional native removals where there is still more than 50-percent cover. Per the City’s Treatment Protocols, Lemonade Berry Scrub is the last element in the removal hierarchy, which would limit the amount of Lemonade Berry Scrub that would otherwise be removed, reducing impacts to less than significant.

One other special-status alliance, big-pod ceanothus (S4), encompasses 0.07 acre and is considered very high value habitat in many settings within Laguna Beach. The proposed project would impact High Value Habitat within FMZ 20 and Very High Value Habitat in FMZ 21, as identified by the City of Laguna Beach Local Coastal Program. Impacts would be reduced to less than significant with the avoidance of the big pod ceanothus and big-leaved crownbeard, per the proposed project’s exclusion areas and measures set forth in the City’s Treatment Protocols. With implementation of the Treatment Protocols, impacts to High and Very High Value Habitat would be reduced to less-than-significant.

With implementation of the Treatment Protocols as part of the proposed project, impacts to riparian and sensitive vegetation types would be less than significant.

4. BIOLOGICAL RESOURCES. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	7	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact. There are no wetlands as defined by the state or under Section 404 of the Clean Water Act, and there would be no impacts due to implementation of the fuel modification program. An assessment of jurisdictional features within the project site was conducted by Glenn Lukos Associates (GLA, 2021a – see Biological Technical Report in Appendix C). Approximately 11 ephemeral drainages occur within the project site. Alteration to these drainages would necessitate authorization from the California Regional Water Quality Control Board in Section 401 of the Clean Water Act. In addition, the streambeds and any adjacent riparian vegetation on the project site are regulated under Section 1600 of the California Fish and Game Code and alteration to these features would necessitate authorization from the CDFW. As noted in the City’s Treatment Protocols, a 25-foot buffer on each side of each significant drainage course would be established and the only vegetation removed from within the significant drainage course would consist of non-native invasive species identified during pre-removal surveys. With establishment of the 25-foot buffers from both edges of each significant drainage and limited vegetation removal, impacts to drainages as defined by the City’s Local Coastal Program would be less than significant.

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?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact With Mitigation Incorporated. The proposed project encompasses natural lands at the edge of residential development. It supports limited wildlife movement as a result of the surrounding development and steep terrain. Movement through the project site appears to be limited to low-lying canyon bottoms and is not likely to occur in areas immediately adjacent to residential development where fuel modification activities are proposed. Additionally, the proposed project is not expected to erect any permanent barriers to wildlife movement or alter wildlife movement through the area; therefore, the proposed project would have no significant impact on wildlife movement.

The project site provides suitable nesting habitat for many birds and nursery sites for other wildlife species. Impacts to nesting bird will be avoided with implementation of Mitigation Measure BIO-3 (nesting bird avoidance) as discussed above for question (a). No additional mitigation measures are needed to reduce impacts to a less-than-significant level. Any impacts to common wildlife species would be less than significant given that habitat would not be removed, habitat would be improved by removal of non-natives, and similar habitat is abundant throughout the vicinity of the project site.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	7	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. 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. A portion of the project site occurs within an area designated as high and very high value habitat. 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 (GLA, 2021a – see Biological Technical Report in Appendix C). 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 to conduct an updated, and smaller-scale assessment of the resources present on site. The proposed project would impact High and Very High Value Habitats consisting of coastal sage or chaparral habitats. The project proposes to reduce the cover within these areas by up to 50 percent with selective thinning which would be a significant impact. The impact to High and Very High Value Habitats would be less than significant because habitat would not be entirely removed from the project site, is abundant in the open space surrounding the project site, and the total acreage of potential impacts to these habitats would be limited. Removal of non-native invasives would benefit habitat.

Additionally, to protect watershed areas and natural watercourses, the City has designated certain drainage features throughout the City as “significant drainage courses.” Avoidance of these drainage courses is recommended within the City’s General Plan 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. As discussed under question (c), 11 segments of significant

4. BIOLOGICAL RESOURCES. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>drainages cross or partially intersect the project site. With establishment of the 25-foot buffers from both edges of each significant drainage and limited vegetation removal per the City’s Treatment Protocols, impacts to the City’s significant drainage courses would be less than significant.</p> <p>Lastly, for areas with coast live oak or western sycamore trees, trees would not be removed. Rather, as set forth in the City’s Treatment Protocols, large trees such as oaks and sycamores shall be pruned of dead components, and lower small branches removed to a height of 8 feet or one half their height, whichever is less, to disrupt “fuel ladder” potential. Dead and down tree components on the ground below large trees shall be removed. With implementation of Treatment Protocols (Appendix A), the project would not conflict with local policies and ordinances, and impacts to the large trees would be less than significant.</p>					
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?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Less Than Significant Impact. The project site is entirely within the Orange County Central Coastal Natural Community Conservation Plan (NCCP)/ Habitat Conservation Plan (HCP) area. The City of Laguna Beach is not a signatory to the Orange County Central Coastal NCCP/HCP and the project does not conflict with the NCCP/HCP because the project proposes to remove invasive species from the project site and reduce the total cover by up to fifty percent using only hand tools. It does not propose to completely remove native habitat. In addition, all potential impacts to sensitive habitats and species are mitigated for as described elsewhere in this document. As such, the proposed project would not conflict with adopted HCPs, NCCPs, or other approved local, regional, or State habitat conservation plan.</p>					

5. CULTURAL RESOURCES. Would the project:	Sources	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?	9	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Less Than Significant Impact With Mitigation Incorporated. A cultural resources study was prepared for the project site (see Appendix D). The study included a cultural resources records search at the South Central Coastal Information Center (SCCIC), a Native American Heritage Commission Sacred Lands File search, Tribal outreach, and an attempted field survey. The record search indicates the presence of two known archaeological sites, P-30-000812 and P-30-000813, within the FMZ 20. A pedestrian survey was not feasible at the time of the study because of safety concerns with the steep slopes and the density of vegetation. Since a pedestrian survey is not possible, P-30-000812 and P-30-000813 are presumed eligible for the California Register of Historical Resources (CRHR) and therefore should be avoided. The project has been designed to include avoidance areas to avoid these resources assuming a conservative buffer of 15-feet, which per Mitigation Measure CUL-3 may be reduced once enough vegetation has been removed to clearly identify the extent of the resources. As such, impacts to known resources would be reduced to a less than significant level. Mitigation Measures CUL-1 and CUL-2 are also recommended to reduce impacts to unanticipated discoveries to a less than significant level.</p>					
Mitigation Measures					
<p>CUL-1 A qualified professional archaeologist shall be retained to provide on-call monitoring services in the event that cultural resources are encountered during project activities. If any such resources are discovered, contractors should stop work in the immediate area of the find and contact the archaeologist to assess the nature of the find and determine if future monitoring is appropriate. If deemed appropriate, monitoring should continue until vegetation removal activities are complete, or until the monitoring archaeologist, based on field observations, is satisfied there is no likelihood of encountering intact archaeological deposits. Upon completion of any monitoring activities, the archaeologist should prepare a report to document the methods and results of monitoring activities. This report should be submitted to the South Central Coastal Information Center.</p>					
<p>CUL-2 Prior to the initiation of construction, all construction personnel shall be trained by a qualified archaeologist regarding the recognition of possible buried cultural resources (i.e., prehistoric and/or historical artifacts, objects, or features) and protection of all archaeological resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural materials. All personnel shall be instructed that unauthorized removal or collection of artifacts is a violation of State law. Any excavation contract (or contracts for other activities that may</p>					

5. CULTURAL RESOURCES. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
have subsurface soil impacts) shall include clauses that require construction personnel to attend the Workers' Environmental Training Program, so they are aware of the potential for inadvertently exposing buried archaeological deposits.					
CUL-3 The locations of P-30-000812 and P-30-000813 shall be excluded and avoided during project vegetation removal. In order to maximize the amount of vegetation removed, all vegetation removal within the vicinity of these exclusion zones shall be monitored by a qualified professional archaeologist. Once enough vegetation has been removed, and the archaeologist can safely access P-30-000812 and P-30-000813, the sites will be delineated and flagged for avoidance. This may allow for a reduction in the size of the exclusion zones. Lastly, the qualified archaeologist shall update the Department of Parks and Recreation (DPR) 523 series forms for P-30-000812 and P-30-000813 as applicable, based on current field observations. DPR 523 updates will be submitted to the SCCIC for inclusion in the archaeological record.					
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	9	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact With Mitigation Incorporated. The settlement of the project site included use of rock shelters naturally formed in the sandstone formations that make up much of the coastal hillside's geology. These shelters had a lifecycle of having been created by natural forces of rain and wind, were utilized by native people for shelter and ceremony, and then ultimately had been eroded to disuse with many eventually suffering collapse. As such, there is a potential for encountering unknown buried resources within the project site. Mitigation Measures CUL-1 and CUL-2 are recommended to reduce impacts to a less than significant level.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?	9	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact With Mitigation Incorporated. No human remains, including those interred outside of dedicated cemeteries, are known in the project site. The project site therefore has a low sensitivity for encountering human remains. Mitigation Measure CUL-4 is recommended to reduce this impact to a less than significant level.

Mitigation Measure

CUL-4 All human remains discovered are to be treated with respect and dignity. Upon discovery of human remains, all work within 50 feet of the discovery area must cease immediately, nothing is to be disturbed, and the area must be secured. The County Coroner's Office must be called. The Coroner has two working days to examine the remains after notification. The appropriate land manager/owner of the site (i.e., Orange County Parks) is to be called and informed of the discovery. It is very important that the suspected remains, and the area around them, are undisturbed and the proper authorities called to the scene as soon as possible, as it could be a crime scene. The Coroner will determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions.

After the Coroner has determined the remains are archaeological/historic-era, the Coroner will make recommendations concerning the treatment and disposition of the remains to the person responsible for the excavation, or to his or her authorized representative. If the Coroner believes the remains to be those of a Native American, he/she shall contact the Native American Heritage Commission (NAHC) by telephone within 24 hours.

The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the remains. The MLD has 48 hours to make recommendations to the landowner for treatment or disposition of the human remains. If the descendant does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the descendant's recommendations, the owner or the descendant may request mediation by NAHC.

According to the California Health and Safety Code, six (6) or more human burials at one (1) location constitute a cemetery (Section 8100), and willful disturbance of human remains is a felony (Section 7052).

6. ENERGY. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6. ENERGY. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Less Than Significant Impact. The proposed project would consume energy in the form of diesel and gasoline fuels used in off-road equipment (woodchipper) and on-road vehicles and hand-held equipment (chainsaws). The proposed project is designed to efficiently remove areas of heavy vegetation that pose a wildfire threat. Indirectly, the proposed project is designed to reduce the potential for wildfires, which would reduce the potential for much greater future energy consumption events that would otherwise be required for firefighting and fire damage repair without the proposed project. Therefore, the proposed project would not include the wasteful, inefficient, or unnecessary consumption of energy resources.</p>					

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. The proposed project does not include renewable energy, restrict renewable energy projects, or restrict the use of renewable energy. The proposed project does not include energy consumption sources that are directly subject to State or local energy efficiency plans. Indirectly, on-road vehicles used during fuel management activities would have to meet the ongoing federal and State fuel efficiency requirements. Therefore, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

7. GEOLOGY AND SOILS. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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.	10	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. According to the California Department of Conservation (DOC) California Earthquake Hazards Zone Application, no known Alquist-Priolo earthquake fault zones exist within 10 miles of the project location. Therefore, the fuel modification activities would have no impact on the potential cause of the rupture of an Alquist-Priolo earthquake fault zone. No impact is anticipated.

ii) Strong seismic ground shaking?	11	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. There are two major inactive fault systems in the City of Laguna Beach, which are the Laguna Canyon Fault and the Temple Hills Fault. There is no evidence within the last 11,000 years that suggests that these faults would become active soon. Furthermore, none of the proposed project activities involve the erection of structures or grading, thus eliminating any risk of additional substantial adverse effects to human life and health caused by seismic ground shaking. Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?	10	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Less Than Significant Impact. According to the DOC California Earthquake Hazards Zone Application, FMZ 20 and FMZ 21 are not located within a liquefaction zone. Furthermore, the proposed project would not exacerbate seismic-related ground failure such as liquefaction because no structures such as buildings would be built on the hillsides, thus eliminating the probability of a seismic-related liquefaction event. Therefore, the proposed project would have no impact on causing adverse effects relating to seismic-related ground failure.

iv) Landslides?	1, 10, 12, 13	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact With Mitigation Incorporated. According to the DOC California Earthquake Hazards Zone Application, FMZ 20 and FMZ 21 are located within a landslide zone. However, the proposed project's activities would not exacerbate the risk of landslides because the exclusive use of hand removal would avoid complete removal of vegetation

7. GEOLOGY AND SOILS. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
and reduce erosion, reducing the probability of a landslide. In very steep areas and slopes previously cleared by homeowners, post-treatment erosion control measures such as scattered cut brush clippings, jute netting, straw bales, and related efforts as recommended in the FMZ 20 and FMZ 21 geotechnical reports (see Appendix E) would be implemented to further minimize the potential for landslides. A qualified biologist would survey for rare plant species in High/Very High Value Habitat, and any native rare plant species would be avoided and left in place. As assessed in the project-specific geotechnical evaluation reports (provided as Appendix E to this Initial Study), the overall likelihood of increased gross slope instability as a result of fuel modification is very low. No mapped landslides are present on the slopes within FMZ 20 or FMZ 21. Residual soils on the bedrock are subject to shallow instability in moderately steep terrain, but steep slopes do not typically support soil accumulation, and therefore pose a relatively low debris flow potential. Sensitive surficial instability areas are indicated in Figure 1 in both reports (see Appendix E). As suggested in the geotechnical evaluation reports' guidelines, Mitigation Measure GEO-1 is recommended, which would require vegetation to be removed in the spring and completed in the early summer in landslide-prone areas within the FMZs, limiting fuel modification effort to the canopy and seasonal grasses, minimizing damage to existing root systems, and using spray adhesives, fiber rolls, or jute matting to maintain soil stability in landslide-prone areas in FMZ 20 and 21. Therefore, impacts would be less than significant with mitigation incorporated.					
Mitigation Measure					
GEO-1 The City of Laguna Beach shall adhere to the following fuel modification protocols in landslide-prone areas in FMZ 20 and FMZ 21:					
<ul style="list-style-type: none"> Fuel modification activities shall be conducted in the spring and summer and allow for some re-establishment of the native canopy prior to the next rainy season. Fuel modification efforts shall be limited to the canopy and seasonal grasses and should minimize damage to the existing root systems. Spray adhesives, fiber rolls, or jute matting shall be used in areas with a thick accumulation of soil on slopes between a 2:1 to 1:1 (horizontal:vertical) ratio prior to winter. 					
b. Result in substantial soil erosion or the loss of topsoil?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Less Than Significant Impact. Although there is potential for project activities to increase soil erosion and topsoil loss, the use of hand crew treatment would leave up to 50 percent or more of native perennial root systems in the soil to minimize potential for erosion. Removed native vegetation may be chipped and spread on the ground for erosion protection. Other erosion control methods such as straw wattles and/or jute netting would be installed where necessary, as recommended by the geotechnical reports. Haul paths would be minimized and rehabilitated with mulch or other methods as deemed appropriate by the project biologist. Areas of relatively low slope (i.e., below 33 percent or 1:3 grade) would be mulched to an adequate depth to minimize weed propagation and ongoing maintenance needs. The proposed project would not use heavy machinery that would disrupt a substantial amount of topsoil. Therefore, impacts to soil erosion or loss of topsoil would be less than significant.					
c. Be located on geologic units 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?	12, 13	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Less Than Significant With Mitigation Incorporated. According to the geotechnical reports (see Initial Study Appendix E), some slopes (ranging from 4:1 to 1:1 ratios [horizontal:vertical]) in FMZ 20 and FMZ 21 have a moderate to high potential for debris and/or mudflows from major fuel modification activities. In these areas, safety measures would include worker fall protection (e.g., field personnel would be trained in fall prevention, and crews would be restricted from working on slopes where field supervisors or staff judge conditions to be unsafe for unprotected work) and post-treatment erosion control measures (e.g., scattered cut brush clippings, jute netting, straw bales, and related efforts as recommended by consulting geologists). Furthermore, Mitigation Measure GEO-1 would reduce the risk of landslides, lateral spreading, liquefaction, and collapse in areas of unstable geologic units. Therefore, impacts would be less than significant with mitigation incorporated.					
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?*		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No Impact. Under the proposed project, no new structures or buildings would be built. No impact from expansive soil would occur.					

7. GEOLOGY AND SOILS. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The proposed project would not require the development or use of any septic systems. No impact from soils incapable of supporting wastewater would occur.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	14	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. A paleontological resource report was completed covering the project area (see Appendix F). According to the report, the project area is mostly underlain by San Onofre Breccia and some exposures of the Topanga Formation. The paleontological resources records search yielded one known San Onofre Breccia locality and two known nearby Topanga Formation localities. As determined in the report, the proposed project is unlikely to substantially impact unique paleontological resources because ground disturbance would be minimal. There is no clear evidence that the Topanga Formation or the San Onofre Breccia would be impacted and would at most be impacted only by pedestrian traffic. Therefore, the proposed project would result in less than significant impacts.

8. GREENHOUSE GAS EMISSIONS. Would the project:	Sources	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?	6, 15	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact. The determination of project significant greenhouse gas (GHG) emission levels can be determined via many methods depending on the type of project, such as by per capita emissions thresholds or total project annual emissions. Per capita thresholds are most relevant to new residential construction projects, or similar projects that have a clear per capita use that can be expressed. For this type of project, an annual GHG emissions threshold would be more appropriate. There are many such thresholds proposed for use by different agencies for different project types; however, the City of Laguna Beach has not approved the use of any CEQA GHG emissions significance thresholds. The SCAQMD has adopted a GHG emissions significance threshold of 10,000 metric tons (MT) of carbon dioxide equivalent (CO₂e) emissions per year for industrial projects. The SCAQMD has also proposed, but not adopted, the use of a “bright line” GHG emissions significance threshold of 3,000 MT CO₂e/year for residential/commercial projects. Other local jurisdictions in Southern California, such as Los Angeles County, San Bernardino County, and Riverside County have approved this emissions level as a CEQA screening level or significance threshold, which is considered reasonable and appropriate for the proposed project. The proposed project’s emissions include temporary emissions from vehicles, chainsaws, and a woodchipper. The proposed project’s total GHG emissions would be substantially below the significance threshold of 3,000 MT CO₂e (<15 MT CO₂e); therefore, the proposed project’s GHG emissions impacts would be less than significant.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	16, 17, 18	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. Applicable plans adopted for the purpose of reducing GHG emissions include the most recent California Air Resources Board’s (CARB) Scoping Plan Update, SCAG’s 2020-2035 Regional Transportation Plan/ Sustainable Communities Strategy, and the City of Laguna Beach Climate Protection Action Plan. The proposed project would temporarily generate small amounts of GHG emissions during fuel modification activities by using small off-road equipment items such as chain saws and a woodchipper, and through the necessary vehicle trips for the workers commute, contractor work trucks, and waste haul trucks. The proposed project would not change the project site area’s use and the less intensive ongoing annual vegetation maintenance would not result in substantial long-term emissions. The proposed project would also appropriately dispose of green waste; native green waste would be mulched and applied on the project site, and non-native green waste would be sent to a green waste recycler. These disposal methods conform with State and City GHG emissions reduction goals to maximize recycling and minimize landfill waste. Therefore, the proposed project would not conflict with

any applicable plan, policy, or regulations adopted for the purpose of reducing the GHG emissions. Impacts would be less than significant.

9. HAZARDS AND HAZARDOUS MATERIALS.
Would the project:

	Sources	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?	1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less Than Significant With Mitigation Incorporated. The proposed project would not involve the routine transport, use, or disposal of hazardous materials. Equipment would be limited to hand tools (e.g., chainsaws, brush-cutters), chippers, and trucks during temporary fuel modification activities. Many of these tools would be powered by gas and/or diesel fuel. Any onsite refueling would need to occur in a containment system to prevent spills, as required by Mitigation Measure HAZ-1. Similarly, trucks would need to be fueled off site (see Mitigation Measure HAZ-1). Per the City’s Treatment Protocols, herbicides would be used for spot treatment of invasive species, would not occur within 25 feet of any blue-line ephemeral drainages or stream courses that cross the treatment areas, and would be specific to the intended use and be used in a manner as not to pose excessive risk to nearby sensitive species or water courses. Herbicides would not be used on a landscape scale to defoliate large expanses of vegetation. Therefore, impacts would be less than significant with mitigation incorporated.

Mitigation Measure

HAZ-1 The City of Laguna Beach shall include the following provisions or similar in the contractor bid contract for hand clearing:

- All power tools shall be fueled in an area clear of fire hazards.
- Fueling of power tools in the fuel modification zones shall occur over a containment system (e.g., plastic tray or tub) to catch and prevent spills.
- Any fuel spills shall be cleaned up immediately and properly disposed.
- All trucks and larger equipment, such as chippers, shall be fueled off site.
- Engine fuel shall not be used as a cleaning solvent.

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?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. Hazardous material use during temporary fuel modification activities would be limited to gas and/or diesel fuel for equipment and herbicides (if spot treatment for invasive species is required and determined necessary by a qualified biologist). Hazardous materials would not be used or stored onsite in quantities that could create a foreseeable upset or accident condition that could create a significant hazard to the public or the environment. Impacts would be less than significant.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Less Than Significant Impact. The proposed project is not located within 0.25 mile of any existing or proposed schools. The nearest school is Anneliese Schools – Aliso Campus (21542 Wesley Dr., Laguna Beach), approximately 0.6 mile to the northwest. Vegetation removal activities would occur by hand crews. The amount of fuel onsite at any given time and the quantity of emissions from equipment, such as chainsaws, brush-cutters, and chippers, would not create a hazardous condition for students or the public given the project’s distance from this school. No impacts would occur.

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?	19, 20, 21	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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9. HAZARDS AND HAZARDOUS MATERIALS.		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:	Sources				
No Impact. Hazardous materials sites pursuant to Government Code Section 65962.5 include all hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the California Health and Safety Code (HSC), all land designated as hazardous waste property or border zone property pursuant to former Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the HSC, all information received by the Department of Toxic Substances Control (DTSC) on hazardous waste disposals on public land pursuant to HSC Section 25242, and all sites listed pursuant to HSC Section 25356. A review of DTCS’s EnviroStor database and the State Water Resources Control Board GeoTracker database, both of which track cleanup, permitting, enforcement, and investigation efforts at facilities with known hazardous waste or groundwater contamination or sites where there may be reasons to investigate further, yielded no known hazardous materials site within the proposed project footprint. Several GeoTracker sites were identified near the project site in urbanized areas; however, all have been cleaned up and have a status of “Completed – Case Closed.” No impact would occur.					
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	22	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No Impact. The proposed project is not located within an airport land use plan or within two miles of an airport. John Wayne Airport is over 13 miles to the northwest of the project site.					
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	23, 24	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Less Than Significant Impact. The proposed project would temporarily place vehicles and equipment at access points to allow hand crews to complete fuel management activities. Access points, as identified in the Project Description Tables 1 and 2, would generally be along residential streets, private roads, and driveways. The work itself would generally be conducted behind homes and a few public facilities. Access through private roads and driveways would be coordinated with homeowners to ensure access is available. Access along public roadways would be maintained. As such, implementation of the proposed project would not interfere with adopted emergency response plans or emergency evacuation plans.					
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	24	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No Impact. The project site lies within designated Very High Fire Hazard Severity Zone as identified by the City of Laguna Beach. FMZ 20 and FMZ 21 are within the City of Laguna Beach Local Responsibility Area (LRA). The proposed project would reduce the risk of wildland fires by removing vegetation cover within 100 feet of residences and public facilities, thereby reducing fire threats to people and structures. Additional fire safety and prevention measures during fuel management activities would include requiring fire extinguishers and hand tools on site, prohibiting smoking, prohibiting operation of power tools during red flag warnings, and implementing proper fueling locations and practices. This impact would be beneficial, and no adverse impacts would occur.					

10. HYDROLOGY AND WATER QUALITY.		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:	Sources				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Less Than Significant Impact. The proposed project area includes several drainage areas that drain to the Pacific Ocean at Laguna Beach approximately 0.13 to 0.43 mile downstream (see Figures 3 and 5). Impacts to water quality could occur as a result of disturbing topsoil and reducing vegetation coverage. Increased sediment delivery to these drainages may result in the addition of organic sediments and herbicides. Both FMZs would be managed by hand crews using chainsaws, brush-cutters, and other hand tools. This will minimize the potential for fuels and lubricants normally associated with larger mechanized equipment and will minimize the disturbance					

10. HYDROLOGY AND WATER QUALITY.

Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>of soil that could cause displacement of sediment to surface waters. As described in the Project Description, 25-foot buffers would be established on either side of blue-line streams to limit impacts to drainages from erosion and sedimentation. Within these buffers, only non-native plant species would be removed by hand crews in accordance with the City's Treatment Protocols, and all other native plant species would be left in place. In certain cases, excessive dead plant matter and rubbish would be removed. All watercourses recognized by the City and California Coastal Commission as "blue line" would be protected within this buffer, except for hand crew removal of invasive plants and certain case-by-case exceptions such as removal of excessive dead plant matter and rubbish. Additionally, hazardous steep slopes, some of which are nearly vertical in some areas, may require modified treatment or avoidance to prevent disturbing unstable areas that could adversely impact nearby water courses. Native vegetation may be chipped and spread on the ground, which will act as a deterrent to surface erosion. Roots of perennial plants would be left in place to reduce erosion where possible. Mulch and other erosion-control measures such as spray adhesives, fiber rolls, straw wattles, and/or jute netting would be installed as necessary for erosion protection as recommended in the site geotechnical reports. Haul paths would be minimized and rehabilitated with mulch or other methods as deemed appropriate by the project biologist. Areas of relatively low slope (i.e., below 33 percent or 1:3 grade) would be mulched to an adequate depth to minimize weed propagation and ongoing maintenance needs. Trash and litter found on the site would be removed.</p> <p>Herbicide use would be limited to spot treatment of invasive species as identified by a biologist and used in a manner as to not pose an excessive risk to watercourses. Herbicide use would be subject to the conditions of the Municipal Separate Storm Sewer System (MS4) Permit for the San Diego Region of the State Water Resources Control Board.</p> <p>Based on the above considerations, this impact is determined to be less than significant.</p>					

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project would not use any groundwater supplies, nor would it increase impervious areas or otherwise interfere with recharge. No impact would occur.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
(i) result in substantial erosion or siltation on- or off-site;	1, 25	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact. There is a potential for increased erosion and siltation into the Pacific Ocean resulting from the removal of vegetative cover. However, the proposed treatments completed by hand crews, which would minimize disturbance of soil that could cause displacement of sediment to surface waters. The treatment area has been evaluated and mapped by a geologist for stability (see Figure 1 in each of the reports provided in Appendix E). Unstable areas may be avoided if deemed unsafe by field supervisors or staff. All blue-line streams would be given a 25-foot buffer from treatment (except for hand crew removal of invasive plants and case-by-case exceptions as described in (a)). Native vegetation may be chipped and spread on the ground, which will act as a deterrent to surface erosion. Roots of perennial plants would be left in place to reduce erosion where possible. Mulch and other erosion-control measures, such as straw wattles and/or jute netting, would be installed as necessary for erosion protection. Haul paths would be minimized and rehabilitated with mulch or other methods as deemed appropriate by the project biologist. Areas of relatively low slope (i.e., below 33 percent or 1:3 grade) would be mulched to an adequate depth to minimize weed propagation and ongoing maintenance needs. The total area to be treated is 20.4 acres (see Table 3) which represents only a small portion (0.4 percent) of the overall Salt Creek/Dana Point Coastal Streams watershed area (approximately 4,741 acres). Therefore, impacts to existing drainage patterns would be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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10. HYDROLOGY AND WATER QUALITY.

Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Less Than Significant Impact. There is a potential for increased runoff into the various drainages within and adjacent to the project area due to reduced vegetation cover. This impact is considered less than significant primarily due to the small size of the area to be treated in comparison to the Salt Creek watershed (See (i) above). Increased runoff would be further reduced by chipping and spreading native vegetation on the ground, leaving roots of perennial plants in place, using mulch and straw wattles for erosion protection, and leaving some vegetative cover in place.					
(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	1, 25	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Less Than Significant Impact. Runoff from the project site would flow into the Pacific Ocean. A small to negligible increase in flood discharge could result from the proposed project, but this increase would be less than significant as described under (ii) above. The area to be treated is a very small fraction of the Salt Creek watershed area and the reduction in vegetative cover would be offset by leaving most perennial plant roots in place and leaving ground cover in the form of mulch. No sources of pollution would be produced other than those described under (a) above.					
(iv) impede or redirect flood flows?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No Impact. The proposed project would remove vegetative cover, which would not alter the terrain or install structures that could impede or redirect flood flows. No impact will occur.					
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	26	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Less Than Significant Impact. Based on the <i>California Emergency Management Agency Tsunami Inundation Map Laguna Beach Quadrangle</i> the proposed project is not within a tsunami inundation zone. Seiches are wave inundation produced on large lakes. There are no lakes adjacent to the project site and therefore no possibility of seiche. Except as described under item (a), the proposed project would produce no pollutants that could affect flood waters. As such, flood hazard impacts would be less than significant.					
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No Impact. The proposed project would have no effect on groundwater as all work would be completed by hand crews and has no features that could conflict with or obstruct a water quality control plan.					

11. LAND USE PLANNING. Would the project:

Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No Impact. The proposed project would not result in any structures that would physically divide an established community. The proposed fuel breaks would be located on the outer edges of urban development. No impact is anticipated.					
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?	27, 28, 29, 30, 31, 32, 33	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Less Than Significant Impact. The proposed project would primarily occur within the planning boundary of the City of Laguna Beach. Project activities would be subject to the policies of the City's General Plan and Local Coastal Program, the Aliso and Wood Canyons Wilderness Park Resource Management Plan (RMP), and the California Coastal Act. Appendix G to this Initial Study identifies the relevant policies from these applicable plans and demonstrates the project's consistency with these policies. The proposed project would have a less than significant impact because it does not conflict with any land use plan, policy, or regulation.					

12. MINERAL RESOURCES. Would the project:	Sources	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?	34	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. According to the California Department of Conservation's Generalized Aggregate Resource Classification Map, FMZ 20 and FMZ 21 are in mineral resources zone (MRZ) 1 and MRZ 3. MRZ 1 is defined as areas where no significant aggregate deposits are present, or where presence is unlikely. MRZ 3 is defined as areas where inadequate information is available to determine the significance of deposit presence. Fuel modification activities would not result in the loss of availability of a known valuable regional or State mineral resource. Therefore, no impact is anticipated.

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?	28, 29	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. No locally important mineral resource recovery sites are delineated in the City of Laguna Beach General Plan or Aliso and Wood Canyons Wilderness Park RMP. No impact would occur.

13. NOISE. Would the project result in:	Sources	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?	35, 36	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact. No new development or land uses are proposed that would generate noise levels in excess of established standards. The proposed project, which is limited to construction-type activities and maintenance, would be completed in compliance with the City of Laguna Beach Noise Ordinance (Title 7 Health and Sanitation, Chapter 7.25 Noise, Section 7.25.080 Construction activity noise regulations) and Orange County noise regulations (Title 4 – Health Sanitation and Animal Regulations, Division 6 – Noise Control, Section 4-6-7 – Special Provisions). Under these regulations, construction noise is allowed between 7:30am and 6:00pm Monday-Friday within the City of Laguna Beach and between 7:00am-8:00pm Monday-Saturday within unincorporated areas of Orange County; no construction activities are allowed on federal holidays. Work completed by hand crews, which would involve the use of mechanical equipment, such as chainsaws and a woodchipper, would be limited to Monday-Friday 8am-5pm and would not occur on federal holidays. Therefore, a less-than-significant impact would occur.

b. Generation of excessive groundborne vibration or groundborne noise levels?	37	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact. Equipment used during vegetation clearing activities would be limited to woodchipper, chainsaws, brush-cutters, and hand tools. This equipment would not generate excessive groundborne vibration or noise levels. Chippers used to create mulch, however, could generate groundborne vibrations. Vibrations generated would attenuate quickly at short distances (within 200 feet or less) and would not be at a level to cause building damage. Any vibrations from equipment would be negligible to nearby structures and would not result in significant impacts.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	19	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project is not located in the vicinity of a private airstrip or within an airport land use plan. John Wayne Airport is over 13 miles to the northwest of the project site.

14. POPULATION AND HOUSING.

Would the project:

Sources	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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The proposed project would not introduce any new development that would directly or indirectly induce substantial unplanned population growth. No impact would occur.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project would not create any new development or involve demolition that would displace people or housing. No impact would occur.

15. PUBLIC SERVICES. 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:

Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. The proposed project would not involve any construction activities nor would it require increased fire protection services. Instead, it would enhance fire safety and reduce wildfire hazards for the public. No new or physically altered fire facilities would be necessary and no impact is anticipated.

b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project is not a development project and would not result in any substantial population increase or new structures that require increased police protection. No impact is anticipated.

c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project is not a development project and would not create demands for new or expanded school facilities. No impact is anticipated.

d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project is not a development project and would not increase the demand for parks. The proposed project would not affect the park service ratio and no new or expanded parks would be necessary. No impact is anticipated.

e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project is not a development project that would affect other public facilities such as library services or hospitals. The proposed project would not increase demands for such public services or otherwise affect performance objectives. No impact is anticipated.

16. RECREATION. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>No Impact. Some portions of FMZ 20 would occur within Aliso and Wood Canyons Wilderness Park. None of the proposed fuel modification activities would increase use of this park. The proposed project would neither cause a population increase nor create new developments that would increase the use of existing recreational facilities. Therefore, no substantial physical deterioration of recreational facilities would occur or be accelerated. No impact is anticipated.</p>					
b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>No Impact. The proposed project does not include any recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact would occur.</p>					

17. TRANSPORTATION. Would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	38, 39	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Less Than Significant Impact. The proposed project would include the use of several vehicles to transport up to an estimated maximum of 14 crew members and equipment. Because there are no major construction activities that would require a substantial number of workers and large equipment, the number of vehicles is expected to be minimal and temporary, and as a result, have nominal impact on local traffic conditions. According to the Caltrans Traffic Volumes report from 2017, approximately 36,800 to 37,750 vehicles travel on the segment of Coast Highway nearest to FMZ 20 and FMZ 21 (Doheny Park Road in Dana Point to Mountain Road in Laguna Beach). The addition of a few vehicles for the proposed project would not add a substantial amount of traffic to existing traffic volumes. The fuel modification activities would not conflict with any of the policies as outlined in the City General Plan's Transportation, Circulation, and Growth Management Element. Therefore, there would be a less than significant impact on the City's circulation policy.</p>					
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Less Than Significant Impact. Section 15064.3 of the State CEQA Guidelines describes vehicle miles traveled (VMT) as an appropriate measure of transportation impacts. In this case, VMT is analyzed qualitatively as the proposed project is most similar to a construction project. Up to 14 crew members would be onsite at any given time to conduct work and are likely to come from local areas. VMT would be generated by transporting workers, equipment, and green waste. The proposed project would involve such a small quantity of vehicles, trips, and total VMT that it would not have a substantial effect on the level of service on Coast Highway and other associated roads. Impacts would be less than significant.</p>					
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>No Impact. The proposed project would not introduce any new geometric design features to roads or include incompatible uses that would substantially increase road hazards. Transportation uses involved in the proposed project would only include compatible uses such as trucks to transport hand crew personnel and small hand-held equipment such as chainsaws, brush-cutters, and other hand tools. No impact would occur.</p>					

	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:					
d. Result in inadequate emergency access?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. FMZ 20 and FMZ 21 would each have multiple access points that would also serve as potential staging areas and provide emergency access if needed. Most of the access points are private roads that require coordination with property owners and would not impede on the general public’s need for emergency access. Therefore, no impact to emergency access would occur.

	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES.					
Would the project:					
a. 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	9	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. Assembly Bill (AB) 52 consultation was not completed for this project as no Native American tribes have requested consultation with the City of Laguna Beach. On September 16, 2020, Aspen requested that the Native American Heritage Commission (NAHC) complete a search of its Sacred Lands Files to determine if resources significant to Native Americans have been recorded within the project site. On September 22, 2020, Aspen received a response from the NAHC stating that the search of its Sacred Lands File was negative for the presence of resources within the project site (see Appendix D). The NAHC also provided their contact list of interested Native Americans to contact for additional information regarding resources in the area. Aspen sent outreach letters on September 28, 2020 to each of the listed representatives asking if any additional information could be provided regarding resources within the project site. Follow up emails and/or phone calls were completed on October 15, 2020 and December 7, 2020. One response has been received to date from the Juaneño Band of Mission Indians, Acjachemen Nation indicating that the tribe had no concerns with the vegetation removal by hand crews.

(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.	40	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. AB 52 consultation was not completed for this project as no Native American tribes have requested consultation for this area of South Laguna. As stated above, the NAHC did not indicate the presence of any tribal cultural resources within the project site and those tribes contacted did not indicate the presence of Tribal Cultural Resources in the project site.

19. UTILITIES AND SERVICE SYSTEMS.					
Would the project:					
Sources	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
No Impact. The proposed project would not include any new development. No utilities or other service systems would be needed. No impact would occur.					
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
No Impact. The proposed project would not include any development. No water supplies would be needed to serve the project. No impact would occur.					
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
No Impact. The proposed project would neither include any development nor require wastewater treatment. No impact would occur.					
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
No Impact. The proposed fuel modification activities would only generate green waste. The amount of green waste would be minimal compared to the amount of solid waste generated by the general public on a daily basis. Of the total amount of green waste generated, native green waste would be left onsite, while the majority of non-native green waste would be hauled to a green waste recycling facility. Any remaining green waste that is not accepted by the green waste recycler would be hauled to a landfill. The total amount of solid waste is not expected to be in excess of the capacity of local infrastructure. Therefore, a less than significant impact would occur.					
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
No Impact. The proposed project would not generate solid waste other than green waste, which would be converted to mulch and left in place or be taken to a green waste recycling facility or landfill. The proposed project would not conflict with federal, state, or local statutes and regulations related to solid waste.					
20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
No Impact. The proposed project would not substantially impair the City's adopted emergency response plan and would instead improve wildfire response. Fuel breaks would create defensible space between wildfires and urban development to reduce risk of ignition. Therefore, no impacts would occur.					

20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. Removal of fuels in the wildland-urban interface would reduce the risk of flammability in developed areas. Therefore, project occupants would not be exposed to hazards from exacerbated wildfire risks. No impact would occur.

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?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The proposed project aims to create and maintain fuel breaks with the intention of reducing fire risk to nearby urban structures. It would not exacerbate fire risks and thus would not require installation or maintenance of infrastructure to reduce those risks. No impact would occur.

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?	1, 12, 13	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact With Mitigation Incorporated. Fuel modification activities would remove vegetation cover in landslide-prone areas in FMZ 20 and FMZ 21. However, the proposed project would implement the City's Treatment Protocols and comply with the geotechnical reports' suggested erosion control methods such as installing spray adhesives, fiber rolls, and/or jute netting as necessary for additional protection, thus maintaining stable topsoil and reducing runoff. Additionally, in very steep areas and slopes previously cleared by homeowners, post-treatment erosion control measures such as scattered cut brush clippings, jute netting, straw bales, and related efforts as determined by the geotechnical reports (Appendix E) would be implemented to further minimize the potential for landslides. Additionally, although some slopes in FMZ 20 and FMZ 21 may have a moderate to high potential for debris and/or mudflows from significant fuel modification, spring or early summer fuel modification should not exacerbate the future mudflow potential, as some of the native canopy would re-establish by the rainy season which would maintain soil stability. Mitigation measures for unstable geologic units within FMZ 20 and FMZ 21 are discussed in Mitigation Measure GEO-1. Flooding, landslides, and post-fire slope instability impacts would be less than significant with mitigation incorporated.

21. MANDATORY FINDINGS OF SIGNIFICANCE	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact With Mitigation Incorporated. Section 4, Biological Resources, discusses the potential impacts to wildlife, plants, and the quality of the environment as well as any required mitigation measures. See Mitigation Measures BIO-1 through BIO-5. Section 5, Cultural Resources, and Section 18, Tribal Cultural Resources, discuss impacts that would be less than significant to historic and prehistoric California artifacts and remains with mitigation incorporated. See Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4. Impacts to these resources would be less than significant with mitigation incorporated.

21. MANDATORY FINDINGS OF SIGNIFICANCE	Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Less Than Significant Impact. Impacts that may contribute cumulatively with concurrent or past projects may include air quality, greenhouse gases, noise, and transportation. The proposed project would utilize a minimal number of vehicles and motorized hand equipment that would not substantially contribute to the impacts of other projects. Due to the highly localized, temporary, and brief nature of the proposed project, these impacts are expected to remain less than significant and not result in a cumulatively considerable impact.					
c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Less Than Significant Impact With Mitigation Incorporated. As discussed in Section 9, Hazards and Hazardous Materials, gas or diesel would be used to fuel equipment. Mitigation Measure HAZ-1 would mitigate any fuel spillage hazards to avoid potential adverse effects on human beings. Section 7, Geology and Soils, refers to the geotechnical reports’ (Appendix E) findings of areas of potential soil unit instability within FMZ 20 and FMZ 21. Section 20(d) of Wildfire also discusses the potential for post-fire downslope landslides. Mitigation Measure GEO-1 would mitigate mudflow and general soil instability risks mentioned in these two sections. Implementing these mitigation measures would lessen impacts and potential effects on human beings to a less-than-significant level.					

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23. MITIGATION MEASURES

For effects that are "Less Than Significant Impact with Mitigation Incorporated," describe the mitigation measure(s) which were incorporated and the extent to which they address site-specific conditions of the project. The responsible person, Department, Agency, etc., that will be responsible for verification and the event or time of verification should also be specified. The following mitigation measures were identified for the proposed project. A Mitigation Monitoring Program is included in Table 4.

4. BIOLOGICAL RESOURCES

- 4(a). BIO-1 The City of Laguna Beach (City) shall assign a qualified biologist to the project (i.e., Project Biologist). The qualified biologist shall be responsible for conducting pre-construction surveys (MM BIO-2), implementing nesting bird avoidance (MM BIO-3), monitoring project activities (MM BIO-4), and conducting worker training (MM BIO-5). The "qualified biologist" is defined as a person with appropriate education, training, and experience to conduct the required surveys, monitor project activities, provide worker education programs, and supervise or perform other monitoring-related actions. The Project Biologist shall be authorized by the City to temporarily halt project activities, if needed, to prevent take of listed species or harm to any other special-status species.
- 4(a). BIO-2 Prior to start of project activities, the Project Biologist shall survey the work area to determine if any special-status species are present. During the survey, the Project Biologist shall search for nesting birds, special-status plants, and other special-status species. Pre-clearing surveys shall be performed during the appropriate blooming period for special-status plants to ensure species present are identified. Any special-status species or sensitive resources shall be flagged and avoided, in coordination with the Project Biologist. If big-leaved crownbeard are located within the project site, they shall be flagged, and a 50-foot buffer installed. Plants with a CRPR of 1B or 2B shall be flagged and a 15-foot buffer installed. Any willow canopy that falls outside the 25-foot buffer around "blue-line" drainages (per the City's Treatment Protocols), shall be avoided. San Diego desert woodrat nests shall be avoided with a 15-foot buffer. No work shall be permitted within these buffers. The Project Biologist shall also flag coast live oak seedlings and western sycamore seedlings for avoidance, as feasible. The Project Biologist shall also search for shot hole borers on all oak and sycamore trees that are proposed for pruning. If shot hole borers are found, the Project Biologist shall notify the City who will then coordinate with OC Parks, CDFW, and the U.S. Fish and Wildlife Service. All pruning tools shall be cleaned and disinfected prior to use within the project area and at least weekly during the project to further reduce the spread of pathogens. To the extent practicable, thinning within coastal sage scrub and chaparral habitats shall be limited to winter months outside the growing season.
- 4(a, d). BIO-3 Vegetation removal and initial ground disturbance shall be completed outside the breeding season (i.e., no removal of potential nesting habitat from January 1 through September 1), or after a pre-construction nesting bird survey has been completed. The Project Biologist shall confirm that no birds are nesting in or adjacent to areas to be disturbed. If native birds are nesting on the site, then project activities shall be postponed until nesting is completed or the Project Biologist shall designate appropriate avoidance buffers around nests to protect nesting birds. No project related disturbance shall be allowed within these buffers.
- 4(a). BIO-4 The Project Biologist shall be present on the project site during vegetation clearing done by hand crews to document compliance with the avoidance and minimization measures and to provide guidance in avoiding or minimizing impacts to biological resources. The Project Biologist shall also conduct quarterly monitoring of the project site for 12-months after the completion of the fuel treatment. During this post-treatment monitoring the Project Biologist will inspect the mulched plant material for Argentine ants and will also note wildlife use of the treatment areas. If Argentine ants are found within the mulched plant material, the City shall implement an

ant control program to remove them from these areas. If any new non-native plants are found within the project area, the City shall implement a control program for these species to ensure they are eradicated and not allowed to spread into adjacent natural lands.

- 4(a). BIO-5 The Project Biologist shall conduct training to ensure that all workers on the project site are aware of all applicable mitigation measures for biological resources. Specifically, workers will be required to (1) limit all activities to approved work areas; (2) report any special-status species; (3) report any bird nests; (4) avoid contact with any wildlife that may approach a work area, and be aware of potential venomous reptile bites from carelessness or unnecessary harassment; (5) pick up and properly dispose of any food, trash, or construction refuse; and (6) report any spilled materials (e.g., oil, fuel, solvent, engine coolant, raw concrete, or other material potentially hazardous to wildlife) to the supervisor. During the training the Project Biologist shall briefly discuss special-status species that may occur in the work areas, their habitats, and requirements to avoid or minimize impacts. In addition, all workers shall be informed of civil and criminal penalties for violations of the federal Endangered Species Act, California Endangered Species Act, and the Migratory Bird Treaty Act.

5. CULTURAL RESOURCES

- 5(a, b). CUL-1 A qualified professional archaeologist shall be retained to provide on-call monitoring services in the event that cultural resources are encountered during project activities. If any such resources are discovered, contractors should stop work in the immediate area of the find and contact the archaeologist to assess the nature of the find and determine if future monitoring is appropriate. If deemed appropriate, monitoring should continue until vegetation removal activities are complete, or until the monitoring archaeologist, based on field observations, is satisfied there is no likelihood of encountering intact archaeological deposits. Upon completion of any monitoring activities, the archaeologist should prepare a report to document the methods and results of monitoring activities. This report should be submitted to the South Central Coastal Information Center.
- 5(a, b). CUL-2 Prior to the initiation of construction, all construction personnel shall be trained by a qualified archaeologist regarding the recognition of possible buried cultural resources (i.e., prehistoric and/or historical artifacts, objects, or features) and protection of all archaeological resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural materials. All personnel shall be instructed that unauthorized removal or collection of artifacts is a violation of State law. Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Workers' Environmental Training Program, so they are aware of the potential for inadvertently exposing buried archaeological deposits.
- 5(a). CUL-3 The locations of P-30-000812 and P-30-000813 shall be excluded and avoided during project vegetation removal. In order to maximize the amount of vegetation removed, all vegetation removal within the vicinity of these exclusion zones shall be monitored by a qualified professional archaeologist. Once enough vegetation has been removed, and the archaeologist can safely access P-30-000812 and P-30-000813, the sites will be delineated and flagged for avoidance. This may allow for a reduction in the size of the exclusion zones. Lastly, the qualified archaeologist shall update the Department of Parks and Recreation (DPR) 523 series forms for P-30-000812 and P-30-000813 as applicable, based on current field observations. DPR 523 updates will be submitted to the SCCIC for inclusion in the archaeological record.
- 5(c). CUL-4 All human remains discovered are to be treated with respect and dignity. Upon discovery of human remains, all work within 50 feet of the discovery area must cease immediately, nothing is to be disturbed, and the area must be secured. The County Coroner's Office must be called. The Coroner has two working days to examine the remains after notification. The appropriate land manager/owner of the site (i.e., Orange County Parks) is to be called and informed of the discovery. It is very important that the suspected remains, and the area around them, are undisturbed and the proper authorities called to the scene as soon as possible, as it could be a crime scene. The Coroner will determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions.
- After the Coroner has determined the remains are archaeological/historic-era, the Coroner will make recommendations concerning the treatment and disposition of the remains to the person responsible for the excavation, or to his or her authorized representative. If the Coroner believes the remains to be those of a Native American, he/she shall contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the remains. The MLD has 48 hours to make recommendations to the landowner for treatment or disposition of the human remains. If the descendant does not make recommendations within 48 hours, the landowner shall reenter the remains in an area of the property secure from further disturbance. If the landowner does not accept the descendant's recommendations, the owner or the descendant may request mediation by NAHC.

According to the California Health and Safety Code, six (6) or more human burials at one (1) location constitute a cemetery (Section 8100), and willful disturbance of human remains is a felony (Section 7052).

7. GEOLOGY AND SOILS & 20. WILDFIRE

7(a, c), 20(d).

- GEO-1 The City of Laguna Beach shall adhere to the following fuel modification protocols in landslide-prone areas in FMZ 20 and the FMZ 21:
- Fuel modification activities shall be conducted in the spring and summer and allow for some re-establishment of the native canopy prior to the next rainy season.
 - Fuel modification efforts shall be limited to the canopy and seasonal grasses and should minimize damage to the existing root systems.
 - Spray adhesives, fiber rolls, or jute matting shall be used in areas with a thick accumulation of soil on slopes between a 2:1 to 1:1 (horizontal: vertical) ratio prior to winter.

9. HAZARDS AND HAZARDOUS MATERIALS

- 9(a). HAZ-1 The City of Laguna Beach shall include the following provisions or similar in the contractor bid contract for hand clearing:
- All power tools shall be fueled in an area clear of fire hazards.
 - Fueling of power tools in the fuel modification zones shall occur over a containment system (e.g., plastic tray or tub) to catch and prevent spills.
 - Any fuel spills shall be cleaned up immediately and properly disposed.
 - All trucks and larger equipment, such as chippers, shall be fueled off site.
 - Engine fuel shall not be used as a cleaning solvent.

Table 4. Mitigation Monitoring Program for Fuel Breaks in FMZ 20 and FMZ 21

Environmental Factor	Reference Number	Mitigation Measures	Responsible Party	Timing
4. BIOLOGICAL RESOURCES	4(a)	<p>BIO-1 The City of Laguna Beach (City) shall assign a qualified biologist to the project (i.e., Project Biologist). The qualified biologist shall be responsible for conducting pre-construction surveys (MM BIO-2), implementing nesting bird avoidance (MM BIO-3), monitoring project activities (MM BIO-4), and conducting worker training (MM BIO-5). The "qualified biologist" is defined as a person with appropriate education, training, and experience to conduct the required surveys, monitor project activities, provide worker education programs, and supervise or perform other monitoring-related actions. The Project Biologist shall be authorized by the City to temporarily halt project activities, if needed, to prevent take of listed species or harm to any other special-status species</p>	City of Laguna Beach Fire Chief	Prior to and during fuel modification activities
	4(a)	<p>BIO-2 Prior to start of project activities, the Project Biologist shall survey the work area to determine if any special-status species are present. During the survey, the Project Biologist shall search for nesting birds, special-status plants, and other special-status species. Pre-clearing surveys shall be performed during the appropriate blooming period for special-status plants to ensure species present are identified. Any special-status species or sensitive resources shall be flagged and avoided, in coordination with the Project Biologist. If big-leaved crownbeard are located within the project site, they shall be flagged, and a 50-foot buffer installed. Any willow canopy that falls outside the 25-foot buffer around "blue-line" drainages (per the City's Treatment Protocols), shall be avoided. San Diego desert woodrat nests shall be avoided with a 15-foot buffer. Plants with a CRPR of 1B or 2B shall be flagged and a 15-foot buffer installed. No work shall be permitted within these buffers. The Project Biologist shall also flag coast live oak seedlings and western sycamore seedlings for avoidance, as feasible. The Project Biologist shall also search for shot hole borers on all oak and sycamore trees that are proposed for pruning. If shot hole borers are found, the Project Biologist shall notify the City who will then coordinate with OC Parks, CDFW, and the U.S. Fish and Wildlife Service. All pruning tools shall be cleaned and disinfected prior to use within the project area and at least weekly during the project to further reduce the spread of pathogens. To the extent practicable, thinning within coastal sage scrub and chaparral habitats shall be limited to winter months outside the growing season.</p>	City of Laguna Beach Fire Chief	Prior to and during fuel modification activities
	4(a, d)	<p>BIO-3 Vegetation removal and initial ground disturbance shall be completed outside the breeding season (i.e., no removal of potential nesting habitat from January 1 through September 1), or after a pre-construction nesting bird survey has been completed. The Project Biologist shall confirm that no birds are nesting in or adjacent to areas to be disturbed. If native birds are nesting on the site, then project activities shall be postponed until nesting is completed or the Project Biologist shall designate appropriate avoidance</p>	City of Laguna Beach Fire Chief	Prior to fuel modification activities outside of bird

Table 4. Mitigation Monitoring Program for Fuel Breaks in FMZ 20 and FMZ 21

Environmental Factor	Reference Number	Mitigation Measures	Responsible Party	Timing
		buffers around nests to protect nesting birds. No project related disturbance shall be allowed within these buffers.		breeding season
	4(a)	BIO-4 The Project Biologist shall be present on the project site during vegetation clearing done by hand crews to document compliance with the avoidance and minimization measures and to provide guidance in avoiding or minimizing impacts to biological resources. The Project Biologist shall also conduct quarterly monitoring of the project site for 12-months after the completion of the fuel treatment. During this post-treatment monitoring the Project Biologist shall inspect the mulched plant material for Argentine ants and will also note wildlife use of the treatment areas. If Argentine ants are found within the mulched plant material, the City shall implement an ant control program to remove them from these areas. If any new non-native plants are found within the project area, the City shall implement a control program for these species to ensure they are eradicated and not allowed to spread into adjacent natural lands.	City of Laguna Beach Fire Chief	During fuel modification activities and continuing for at least 12 months following completion of activities
	4(a)	BIO-5 The Project Biologist shall conduct training to ensure that all workers on the project site are aware of all applicable mitigation measures for biological resources. Specifically, workers shall be required to (1) limit all activities to approved work areas; (2) report any special-status species; (3) report any bird nests; (4) avoid contact with any wildlife that may approach a work area, and be aware of potential venomous reptile bites from carelessness or unnecessary harassment; (5) pick up and properly dispose of any food, trash, or construction refuse; and (6) report any spilled materials (e.g., oil, fuel, solvent, engine coolant, raw concrete, or other material potentially hazardous to wildlife) to the supervisor. During the training, the Project Biologist shall briefly discuss special-status species that may occur in the work areas, their habitats, and requirements to avoid or minimize impacts. In addition, all workers shall be informed of civil and criminal penalties for violations of the federal Endangered Species Act, California Endangered Species Act, and the Migratory Bird Treaty Act.	City of Laguna Beach Fire Chief	Prior to fuel modification activities
5. CULTURAL RESOURCES	5(a, b)	CUL-1 A qualified professional archaeologist shall be retained to provide on-call monitoring services in the event that cultural resources are encountered during project activities. If any such resources are discovered, contractors should stop work in the immediate area of the find and contact the archaeologist to assess the nature of the find and determine if future monitoring is appropriate. If deemed appropriate, monitoring should continue until vegetation removal activities are complete, or until the monitoring archaeologist, based on field observations, is satisfied there is no likelihood of encountering intact archaeological deposits. Upon completion of any monitoring activities, the archaeologist should prepare a report to document the methods and results of	City of Laguna Beach Fire Chief	During fuel modification activities

Table 4. Mitigation Monitoring Program for Fuel Breaks in FMZ 20 and FMZ 21

Environmental Factor	Reference Number	Mitigation Measures	Responsible Party	Timing
		monitoring activities. This report should be submitted to the South Central Coastal Information Center.		
	5(a, b)	CUL-2 Prior to the initiation of construction, all construction personnel shall be trained by a qualified archaeologist regarding the recognition of possible buried cultural resources (i.e., prehistoric and/or historical artifacts, objects, or features) and protection of all archaeological resources during construction. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural materials. All personnel shall be instructed that unauthorized removal or collection of artifacts is a violation of State law. Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Workers' Environmental Training Program, so they are aware of the potential for inadvertently exposing buried archaeological deposits.	City of Laguna Beach Fire Chief	Prior to fuel modification activities
	5(a)	CUL-3 The locations of P-30-000812 and P-30-000813 shall be excluded and avoided during project vegetation removal. In order to maximize the amount of vegetation removed, all vegetation removal within the vicinity of these exclusion zones shall be monitored by a qualified professional archaeologist. Once enough vegetation has been removed, and the archaeologist can safely access P-30-000812 and P-30-000813, the sites will be delineated and flagged for avoidance. This may allow for a reduction in the size of the exclusion zones. Lastly, the qualified archaeologist shall update the Department of Parks and Recreation (DPR) 523 series forms for P-30-000812 and P-30-000813 as applicable, based on current field observations. DPR 523 updates will be submitted to the SCCIC for inclusion in the archaeological record.	City of Laguna Beach Fire Chief	During fuel modification activities
	5(c)	CUL-4 All human remains discovered are to be treated with respect and dignity. Upon discovery of human remains, all work within 50 feet of the discovery area must cease immediately, nothing is to be disturbed, and the area must be secured. The County Coroner's Office must be called. The Coroner has two working days to examine the remains after notification. The appropriate land manager/owner of the site (i.e., Orange County Parks) is to be called and informed of the discovery. It is very important that the suspected remains, and the area around them, are undisturbed and the proper authorities called to the scene as soon as possible, as it could be a crime scene. The Coroner will determine if the remains are archaeological/historic or of modern origin and if there are any criminal or jurisdictional questions. After the Coroner has determined the remains are archaeological/historic-era, the Coroner will make recommendations concerning the treatment and disposition of the	City of Laguna Beach Fire Chief	During fuel modification activities

Table 4. Mitigation Monitoring Program for Fuel Breaks in FMZ 20 and FMZ 21

Environmental Factor	Reference Number	Mitigation Measures	Responsible Party	Timing
		<p>remains to the person responsible for the excavation, or to his or her authorized representative. If the Coroner believes the remains to be those of a Native American, he/she shall contact the Native American Heritage Commission (NAHC) by telephone within 24 hours.</p> <p>The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the remains. The MLD has 48 hours to make recommendations to the landowner for treatment or disposition of the human remains. If the descendant does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the descendant's recommendations, the owner or the descendant may request mediation by NAHC.</p> <p>According to the California Health and Safety Code, six (6) or more human burials at one (1) location constitute a cemetery (Section 8100), and willful disturbance of human remains is a felony (Section 7052)</p>		
<p>7. GEOLOGY AND SOILS</p> <p>20. WILDFIRE</p>	<p>7(a, c)</p> <p>20(d)</p>	<p>GEO-1 The City of Laguna Beach shall adhere to the following fuel modification protocols in landslide-prone areas in FMZ 20 and FMZ 21:</p> <ul style="list-style-type: none"> • Fuel modification activities shall be conducted in the spring and summer and allow for some re-establishment of the native canopy prior to the next rainy season. • Fuel modification efforts shall be limited to the canopy and seasonal grasses and should minimize damage to the existing root systems. • Spray adhesives, fiber rolls, or jute matting shall be used in areas with a thick accumulation of soil on slopes between a 2:1 to 1:1 (horizontal:vertical) ratio prior to winter. 	<p>City of Laguna Beach Fire Chief</p>	<p>During fuel modification activities</p>
<p>9. HAZARDS AND HAZARDOUS MATERIALS</p>	<p>9(a)</p>	<p>HAZ-1 The City of Laguna Beach shall include the following provisions or similar in the contractor bid contract for hand clearing:</p> <ul style="list-style-type: none"> • All power tools shall be fueled in an area clear of fire hazards. • Fueling of power tools in the fuel modification zones shall occur over a containment system (e.g., plastic tray or tub) to catch and prevent spills. • Any fuel spills shall be cleaned up immediately and properly disposed. • All trucks and larger equipment, such as chippers, shall be fueled off site. • Engine fuel shall not be used as a cleaning solvent. 	<p>City of Laguna Beach Fire Chief</p>	<p>Prior to fuel modification contract signing</p>

