
Final Initial Study/
Mitigated Negative Declaration

North Coast Interceptor Reach 5 Replacement Project

MAY 2026

Prepared for:

CITY OF LAGUNA BEACH

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Laguna Beach, California 92651

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A	North Coast Interceptor (NCI) Reach 5 Replacement Project – Central-Coastal NCCP/HCP Minor Amendment
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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
CEQA	California Environmental Quality Act
City	City of Laguna Beach
dBA	A-weighted decibels
HDD	horizontal directional drill
IS/MND	Initial Study/Mitigated Negative Declaration
LS	Lift Station
NCI	North Coast Interceptor
project	NCI Reach 5 Replacement Project
SCWD	South Coast Water District
The Ranch	The Ranch at Laguna Beach

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1 Introduction

An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the proposed North Coast Interceptor (NCI) Reach 5 Replacement Project (project) and made available for public comment for a 30-day public review period from January 30, 2025, through February 28, 2025. In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15074(b), before approving the proposed project, the City of Laguna Beach (City), as the lead agency under CEQA, will consider the IS/MND with any comments received during this public review period. Specifically, Section 15074(b) of the CEQA Guidelines states the following:

Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis.

The agencies and individuals who provided substantive written comments on the environmental issues addressed in the Draft IS/MND are listed in Table 1. Although CEQA (California Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (14 CCR 15000 et seq.) do not explicitly require a lead agency to provide written responses to comments received on an IS/MND, the lead agency may do so voluntarily. Individual comments within each communication are numbered so comments can be cross-referenced with responses.

Table 1. Comment Letter Summary

Letter Number	Commenter	Date
Residents		
R1	Anne Girtz	February 6, 2025
R2	Rochelle Gerson	February 9, 2025
R3	Gena Douzjian	February 10, 2025
R4	Timothy Dowling	February 10, 2025
R5	Richard A. Luben	February 10, 2025
R6	Laura Markarian	February 10, 2025
R7	Veronica	February 10, 2025
R8	Ameae Walker	February 11, 2025
R9	Tad Bogdan	February 12, 2025
R10	Ameae Walker	February 22, 2025
R11	Laura Markarian	February 24, 2025
R12	Laura Markarian Follow-up Email (after conclusion of comment period)	March 9, 2025
Tribes		
T1	Gabrieleeño Tongva	February 4, 2025
T2	Gabrieleeño Band of Mission Indians – Kizh Nation	February 10, 2025

Table 1. Comment Letter Summary

Letter Number	Commenter	Date
Agencies		
A1	OC Parks	February 26, 2025
A2	Orange County Transportation Authority	February 26, 2025
A3	OC Parks Follow-up Email (after conclusion of comment period)	March 24, 2025

Responses to comments are made in the following text to supplement, clarify, or expand on information already presented in the Draft IS/MND. These responses do not change the significance determinations made or the severity of potential environmental impacts evaluated in the Draft IS/MND. Section 15073.5(c)(4) of the CEQA Guidelines permits the inclusion of new information within an IS/MND if the additional information “merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.”

2 Responses to Comments

2.1 Thematic Responses

In the interest of providing comprehensive responses and avoiding duplication, where multiple commenters have addressed the same issue, Thematic Responses have been prepared to address common themes. These Thematic Responses are provided below, followed by the comment letters and responses to individual comments (see Section 2.2). Responses to individual comments refer to Thematic Responses as appropriate.

Thematic Response 1: Staging Areas

Staging areas for the project would be limited to the proposed horizontal directional drill (HDD) receiving area, located at The Ranch at Laguna Beach's (The Ranch's) driving range, and the HDD launching area, located at The Ranch's golf course, as shown on Figure 2-7 of the Draft MND. There is a possibility that the Aliso Beach parking lot on the inland side of Coast Highway may be used as a laydown or materials storage area if the contractor needs the additional space. No staging, laydown, or storage for the project would occur along Country Club Drive.

Thematic Response 2: Construction Noise

As described in Section 3.13, Noise of the Draft IS/MND, a predictive noise analysis was conducted for each segment of the proposed project alignment to assess the construction noise level at a representative residential distance of 50 feet. The highest noise levels at noise-sensitive land uses (86 A-weighted decibels [dBA] sound equivalent level) are predicted to occur during use of rough-terrain forklifts (i.e., Gradalls) and the horizontal bore drill. Construction of all project segments, except the open trench to HDD receiving area segment, would be compliant with the Federal Transit Administration's daytime threshold of 80 dBA 8-hour sound equivalent level, which was adopted as a quantified construction threshold absent a City-adopted numerical threshold for construction noise. Construction of the HDD receiving area segment would occur for a period of 18 weeks. Thus, the Federal Transit Administration's more stringent 70 dBA standard would apply to construction of this segment. Furthermore, open cut trenching work along County Club Drive toward The Ranch Resort driving range from Station 19+50 to Station 26+00 must occur during nighttime (8:00 p.m. to 5:00 a.m.) because daytime work would shut down the operation of The Ranch Resort. The night work has been discussed with The Ranch Resort ownership and they have agreed that night work is the only feasible option for this portion of the work. Therefore, the City has agreed to do the work on this segment at night to reduce impacts to The Ranch Resort's business operations. Absent mitigation, construction of this segment would exceed the nighttime threshold. Mitigation Measure (MM) NOI-1 includes installation of a temporary, movable sound barrier that, when properly placed between the construction activity and the receptor location of concern, would block construction noise sufficiently to attenuate sound levels to a level compliant with the Federal Transit Administration nighttime construction noise threshold. As such, with the application of MM-NOI-1 during construction of the HDD receiving area segment, construction noise associated with the project would not constitute a significant impact. In addition, as construction is completed along the alignment, construction activities would move further away from residences and would not occur in one place for the 3 years of construction.

Thematic Response 3: Construction Unrelated to the Project

Construction of the Lift Station 2 Project by South Coast Water District, which is not part of the current project, is ongoing within the vicinity of the project site. Many comments from nearby residents on the proposed project express concerns with current ongoing construction, including visual, dust, and noise concerns. While these concerns are acknowledged, they are not associated with the proposed project and are therefore outside of the purview of this document. South Coast Water District has indicated that they are actively working to address these concerns with the Lift Station 2 construction contractor and are discussing potential options to reduce impacts, such as increasing dust control and minimizing truck backups. Construction of the proposed project would not overlap with current construction related to Lift Station 2. As such, no further response is required.

Thematic Response 4: Robust Alternatives Analysis and the Necessity of the Project

The NCI is the sole wastewater conveyance system for wastewater collected within the City north of Nye's Place to the South Orange County Wastewater Authority coastal treatment plant. In 2002, the City commissioned a system assessment report, which was used for steering various improvements to the pipeline and lift stations over the past over-15 years. Over the years, the majority of focused improvements included addressing condition and reliability issues at South Orange County Wastewater Authority's Laguna Sewage Lift Station and Bluebird Sewage Lift Station. Recent issues along the NCI are prompting the need for refocusing effort on risk and reliability of the NCI. In 2015, a technical study was prepared to evaluate the realignment of the NCI within Aliso Creek; the NCI Reliability Assessment began in January 2020 with a final report submitted in July 2020. In May 2021, a workshop was held to further evaluate alternatives, which were finalized in August 2021. Criteria that were considered in the alternatives analysis were the reliability of the alternative to prevent sewer spills, maintenance/accessibility, project cost, lifecycle cost, construction traffic disruption, construction noise disruption, operation and maintenance safety, potential source of sewer odor, potential for utility conflicts, potential for shared service, and the complexity of permitting, entitlements, and environmental impacts. The goal was to select an alternative that is financially feasible, is feasible from an engineering standpoint, does not shut down any businesses, and reduces environmental impacts to the greatest extent possible.

Aliso Canyon is a challenging area because of the steepness of the hillsides, the location of the creek, and the sensitive habitat throughout the entire area. The area also has multiple property owners and restrictive easements that make the selection of a new alignment very challenging. The existing NCI Reach 5 is within the creek itself and is an aging pipeline that is over 50 years old and needs to be replaced. Failures of this pipeline have resulted in sewage spills in the creek and out to Aliso Beach. The City understands that this project would have some inconvenience to the adjacent property owners for the short term, but it is necessary to reduce sewage spills, which impact residents, businesses, and the natural environment.

2.2 Individual Responses

This section includes each comment letter received and responses to individual comments. Responses to individual comments refer to the Thematic Responses in Section 2.1 as appropriate.

Subject: NCI Reach 5 project/EIR

From: Anne Girtz <anne.girtz@gmail.com>

Sent: Thursday, February 6, 2025 8:33 PM

To: Escalona, Ulises PW <uescalona@lagunabeachcity.net>

Subject: NCI Reach 5 project/EIR

[NOTICE: This message originated outside of City of Laguna Beach -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Hi Ulises,

I am a Laguna Beach resident and saw the EIR for this project in the City's weekly newsletter.

I have a few questions about the project:

Why does the dual pipeline not extend all the way to the headworks? Based on my understanding, the dual pipelines end at the isolation valve vault (STA 52+00) and from there to the headworks, only the existing 24" pipeline (to be sliplined) will serve that portion (900 ft). Why install a dual pipeline for the entire rest of the alignment but not this portion?

R1-1

Have the challenges with sliplining a 90 degree horizontal bend in on the existing 24" pipeline been considered? How will this be successfully completed, especially with no nearby access ports? Have you considered loss of pipe inner diameter with the potential for lining folding/thickness?

R1-2

R1-3

Thanks for your time. Looks like an interesting and challenging project.

Anne Girtz

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Response to Comment Letter R1

Anne Girtz, Resident
February 6, 2025

- R1-1** The comment requests an explanation for why dual pipelines do not extend all the way to the treatment plant. The existing NCI enters the treatment plant by crossing directly under Aliso Creek and entering the headworks within a highly congested area. It was determined as part of preliminary design that the junction structure that joins the dual pipes back together is best located outside of the treatment plant due to space constraints within the plant and impacts to operations. The design instead incorporates a flanged connection point both within the junction structure and within the headworks to erect a temporary gravity bypass at any time in the future to allow for the regular inspection and maintenance of the pipeline, effectively providing the same level of service as the rest of the alignment.
- R1-2** The comment asks if 90-degree horizontal bends have been considered for the sliplining section. The sliplining portion would be conducted using flexible fabric reinforced pipe and be 20 inches in diameter, which is smaller than the host pipe. This pipe material is designed to accommodate navigating 90-degree elbows as part of the installation process.
- R1-3** The comment asks how the sliplining would be conducted and if the potential for reduction in pipe diameter has been considered. A temporary aboveground bypass pipe would be connected between the junction structure and the headworks to allow for gravity diversion of flows within the portion of existing pipe to be sliplined. This would allow for the inspection of the existing pipe and sliplining. The existing 24-inch NCI pipeline is oversized for City development buildout. This project intentionally reduces the pipeline diameter to increase flushing velocity and reduce the potential for buildup of sediment.

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Comment Letter R2

Subject: City and Water District Projects

From: Rochelle Gerson <rmogerson16@gmail.com>
Subject: City and Water District Projects
Date: February 9, 2025 at 2:54:52 PM PST
To: uescalona@lagunabeachcity.com
Cc: Laura Markarian <lauramarkarian@gmail.com>, Gena Douzdjian <douzdjian@comcast.net>, Ray Wahid <raywahid@yahoo.com>, TIMOTHY DOWLING home <timothyddowling@gmail.com>, Veronica Abusleme <drvero01@aol.com>, Ameae M Walker <ameae.walker@ucr.edu>, Andy Carney <copperheadstudio@gmail.com>, Alan Gerson <ahg@enteractivesolutions.com>, Taryn Kjolsing <tkjolsing@scwd.org>, pilar rueda <pilarr@att.net>, Tad Bogdan <tadbogdan@gmail.com>, Monique H Bogdan <moniquebogdan@gmail.com>, Seema Tailor <tailor92603@gmail.com>, Richard Luben <richard.luben@ucr.edu>

Hi Ulises,

Thank you for taking the time to speak with me last week regarding the proposed sewer project on Country Club Drive which is anticipated to be active mid-2026 thru 2028. As discussed, I am a unit owner in the Creekside Condominiums which are set in the hillside above the creek. We are currently experiencing the enormous disruption caused by the water district project which is scheduled to go through early 2026. As I described to you, I and many of my neighbors bought into these condos for the beautiful view and peaceful surroundings. Starting in 2016 the area below us has been used as a city staging area even for work being done elsewhere. I have included "before" photos of the vista prior to 2016/17. Many of us have our condos as a 2nd home...an escape from the city. However, due to the constant noise (trucks beeping all day long), filth and ugly view, we no longer have the same use and enjoyment of our homes. It goes without saying this is far worse for those who live there as their primary home. All of this has not only impacted our enjoyment of our homes but effectively reduces the financial value for both rent and sale.

Attached is a taste of what we are experiencing now. If the video didn't download I can text it to you. You mentioned that you don't expect the sewer project to be as disruptive as the current water district project, as only part of the work will be

R2-1

R2-2

R2-3

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Response to Comment Letter R2

Rochelle Gerson, Resident
February 9, 2025

- R2-1** The comment states that the commenter is an owner in the Creekside Condominiums located on the hillside above Aliso Creek and that residents are currently experiencing disruption from ongoing construction of a current project that is scheduled to continue through early 2026. Please see Thematic Response 3 for a discussion of construction impacts not related to the project.
- R2-2** The comment states that there has been a construction staging area below the condo complex starting in 2016/2017 that has caused constant noise and has ruined views from the homes in the complex. It further states that in addition to impacting residents' ability to enjoy their homes, the constant construction impacts have reduced the financial value of the condos for both rent and sale. Please see Thematic Response 3 for a discussion of construction impacts not related to the project.
- R2-3** The comment asks that construction staging for the project take place somewhere other than the area currently used for staging ongoing projects. Please see Thematic Response 1 for a discussion of proposed construction staging areas for the project.
- R2-4** The comment states that construction work hours should be strictly adhered to and that for ongoing construction, truck noise has been heard as early as 6:35 a.m. Please see Thematic Response 2 for a discussion of construction noise levels and hours of construction.
- R2-5** The comment expresses the desire to explore solutions and invites other residents to provide thoughts and suggestions. This comment is acknowledged. The City will continue to engage with the community surrounding the project site on its concerns.

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Subject: City and Water District Projects

On Feb 10, 2025, at 9:47 AM, Gena Douzджian <douzdjian@comcast.net> wrote:

Dear Mr. Escalona-

I am writing in support of my neighbors at Creekside South Laguna HOA. I live in the building above them, and while our visual impairment is not as severe as theirs, we also hear the continuous beeping—though not as loudly.

R3-1

My husband and I purchased our condo as a place to relax and enjoy the stunning views and everything Laguna Beach has to offer. Unfortunately, with the ongoing and upcoming projects, we have not been able to experience true tranquility and are concerned that the disruption will continue for the next five years.

R3-2

Additionally, the staging area in the parking lot below us has expanded, further obstructing our views with tractors and porta-potties. It appears the staging area gets bigger and bigger as time goes on.

R3-3

We appreciate your attention to these concerns and look forward to your response.

Best -
Gena Douzджian
21744 Wesley Dr
Laguna Beach, CA 92651
503-754-6414

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Response to Comment Letter R3

Gena Douzjian, Resident
February 10, 2025

- R3-1** The comment expresses support for other residents of Creekside Condominiums and states that continuous beeping from ongoing construction can be heard from the commenter's residence. Please see Thematic Response 3 for a discussion of construction impacts not related to the project.
- R3-2** The comment states that ongoing and upcoming construction projects have disrupted the commenter's relaxation and views from their condo, which were primary reasons for purchasing the condo. Please see Thematic Response 3 for a discussion of construction impacts not related to the project and Thematic Response 4 about the necessity of the project. Please see Thematic Response 2 for a discussion of construction noise levels and hours of construction.
- R3-3** The comment states that construction staging associated with ongoing construction is obstructing views from the commenter's residence and that the staging area has gotten bigger over time. Please see Thematic Response 3 for a discussion of construction impacts not related to the project. Please see Thematic Response 1 for a discussion of proposed construction staging areas for the project.

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Response to Comment Letter R4

Timothy Dowling, Resident
February 10, 2025

- R4-1** The comment states that the commenter is a resident on Wesley Drive in Laguna Beach and that construction noise has disrupted his home for 9 years. Please see Thematic Response 3 for a discussion of construction impacts not related to the project and Thematic Response 4 about the necessity for the project.
- R4-2** The comment states that there is disruptive construction and beeping during the day and night. Please see Thematic Response 3 for a discussion of construction impacts not related to the project. Please see Thematic Response 2 for a discussion of construction noise levels and hours of construction.
- R4-3** The comment states that ongoing construction has ruined resident's views and peacefulness and that construction staging should be moved elsewhere. Please see Thematic Response 1 for a discussion of proposed construction staging areas for the project.

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Subject: Aliso Creek Trenching and Construction Proposal

From: Richard A Luben <richard.luben@ucr.edu>

Sent: Monday, February 10, 2025 3:16 PM

To: Timothy Dowling <timothyDdowling@gmail.com>; arounaghi@lagunabeachcity.net <arounaghi@lagunabeachcity.net>; Taryn Kjolsing <tkjolsing@scwd.org>

Cc: uescalona@lagunabeachcity.com <uescalona@lagunabeachcity.com>; Pilar Rueda <pilarrr@att.net>; Seema Tailor <tailor92603@gmail.com>; Ray Wahid <raywahid@yahoo.com>; Rochelle Gerson <rmogerson16@gmail.com>; Alan Gerson <ahg@enteractivesolutions.com>; Veronica Abusleme <drvero01@aol.com>; Tad Bogdan <tadbogdan@gmail.com>; Monique Bogdan <moniquebogdan@gmail.com>; Gina Carney <copperheadstudio@gmail.com>; Lily Dowling <lilydowlingla@gmail.com>; Laura Markarian <lauramarkarian@gmail.com>; Ameae M Walker <ameae.walker@ucr.edu>

Subject: Aliso Creek Trenching and Construction Proposal

To all addressees:

I'm supporting the messages from my friends at Creekside condo complex. Inserted below are three photos of the current construction activity, taken out of the windows of my family's condo, just to show the discouraging scale of work already going on continuously in what is essentially "our back yard". My family's condo is directly faced on the SCWD property that has been under construction ever since we moved in at the beginning of 2018 — *and which is now proposed to continue as long as 2029!* My friends have already described the noise, which is disturbing and damaging to our property values.

R5-1

I think the property owners all along Country Club Drive have not been adequately informed or consulted in the past, on the environmental disruption and damage to property values of the three major construction projects that have been carried out adjacent to our property during the last 8-10 years [SCWD Tunnel repair/replacement, 2017-2021; SCWD Lift station 2, 2022-2026; and Caltrans PCH curb repair 2020-2026+].

R5-2

Now SCWD **again** wants, with limited consultation, to do a major sewer conduit construction adjacent to Country Club Drive and our property. We do **not** believe we were adequately included in the planning stages as required by law, and we didn't receive the 670-page project proposal plan until this week. At the very least, it seems fair that SCWD and the City of Laguna Beach should have conferred **directly** with the affected property owners. The project should not be brought to a vote by the City Council until there has been sincere discussion with the affected property owners about ways to mitigate further damage to our daily living and our property values.

R5-3

As an example of how consultation is important, we note that one major property owner (The Ranch) **has** been consulted, and the project plan proposal **was** modified at the suggestions of The Ranch. To meet the concerns of the Ranch, the original plan was changed to do a significant amount of heavy trenching and demolition AT NIGHT. We think that four months or more of loud demolition would dramatically damage the rights of **OUR** condo owners to sleep during the months that the nighttime work would be going on. Moreover, this nighttime disturbance would bother not only the residents on the North side of Country Club Drive (where we live), but also the multiple homeowners whose property looks down on the South side of Aliso Creek. Large noisy and lighted activities at night also do not seem to be compatible with State regulations for the Parkland type of habitat that describes the entire area of the Aliso Creek Estuary adjacent to Aliso Creek.

R5-4

R5-5

To summarize, we think there needs to be more consultation with the affected property owners (not just the businesses) before there should be a vote by the City endorsing such an intrusive extension of the already-disturbing construction projects along Aliso Creek and Country Club Drive.

R5-6

Richard A. Luben
21720 Wesley Dr.
Laguna Beach CA 92651





Richard Luben

(951)522-8643

richard.luben@ucr.edu

Note: This message is from outside the Organization

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Response to Comment Letter R5

Richard A. Luben, Resident
February 10, 2025

- R5-1** The comment states that ongoing (project) construction is disturbing and damaging to property values. Economic impacts are not subject to review under CEQA. This comment, as it relates to economic impacts, does not address the adequacy of the analysis in the IS/MND or raise concerns about CEQA-relevant impacts. No response is warranted. Regarding the construction noise from the reconstruction of Lift Station 2 led by South Coast Water District, please see Thematic Response 3 for a discussion of construction impacts not related to the project. Please see Thematic Response 4 regarding the necessity of the project.
- R5-2** The comment states that property owners along Country Club Drive have not been adequately consulted on three past projects in the area. The three projects referenced have each been conducted by different lead agencies (South Coast Water District [SCWD] and the California Department of Transportation) that have each been engaged in upgrading and repairing necessary infrastructure. Please see Thematic Response 3 for a discussion of construction impacts not related to the project.
- R5-3** The comment states that there has been limited consultation with residents about the project and that SCWD and the City should have conferred directly with affected property owners. The City was not involved with the SCWD project's CEQA documents and invites the commenters to correspond with SCWD on these issues.
- R5-4** The comment states that The Ranch has been consulted and that project plans were modified in response to suggestions to include nighttime work. Please see Thematic Response 2 about construction nighttime work.
- R5-5** The comment states that nighttime construction would disturb residents of the Creekside Condominium complex and other homeowners. It further states that nighttime noise and activity does not seem compatible with regulations for the parkland habitat of the Aliso Creek Estuary. Please see Thematic Response 2 for a discussion of construction noise, including nighttime construction noise. Please see Thematic Response 4 regarding the necessity of the project.
- R5-6** This comment is a closing statement that summarizes the concerns stated throughout the comment letter. No new comments related to the content of the IS/MND are presented. No response is warranted.

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Comment Letter R6

Subject: City and Water District Projects

On Feb 10, 2025, at 9:26 AM, Laura Markarian <lauramarkarian@gmail.com> wrote:

Good morning,

I'm following up on the email Rochelle Gerson sent you. In addition to the unsightly appearance of the staging area, the noise has become unbearable. I've attached a video so you can experience both the visual and sound disturbances we deal with daily. The beeping begins at 6:30 am and continues all day, every day. This is only a 5 second video however, I have a larger video I could text you.

R6-1

I would like to have a conversation with you, so please call me at 949-371-7500.

R6-2

<Beeping Video - Country Club Project.mov>

Laura Markarian
lauramarkarian@gmail.com
949-371-7500

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Response to Comment Letter R6

Laura Markarian, Resident
February 10, 2025

- R6-1** The comment states that noise from existing construction is unbearable, beginning at 6:30 a.m. and continuing all day. Please see Thematic Response 3 for a discussion of construction impacts not related to the project.
- R6-2** The comment requests a call from the City.

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Comment Letter R7

Subject: City and Water District Projects

On Mon, Feb 10, 2025 at 7:10 PM drvero01@aol.com <drvero01@aol.com> wrote:

Hi

This is Veronica

Another neighbor,

my place is just below Tim's

21722 Wesley Dr

R7-1

I do not want to write the same complaint

But,,

Reading what Tim wrote is like "are you reading my mind ?"!!'

R7-2

I visit my Laguna condo twice last year only

due to the very same reason.

And now they want to start another project that will last who knows how long?

R7-3

So who says we have no rights ???

Thanks God we still have a Judiciary system.

R7-4

We have to come up with an agreement !!

Enough is enough!!

R7-5

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Response to Comment Letter R7

**Veronica, Resident
February 10, 2025**

- R7-1** This comment is introductory in nature, explaining the identity and place of residence of the commenter. The comment is not related to the content of the IS/MND. No response is warranted.
- R7-2** The comment states that the commenter only visited their condo twice last year due to ongoing construction disturbances. The comment is not related to the content of the IS/MND. No response is warranted. Please see Thematic Response 3 for a discussion of construction impacts not related to the project. Please see Thematic Response 4 regarding the necessity of the project.
- R7-3** The comment suggests that the length of project construction is unknown. As described in Section 2.4, Project Construction and Phasing, of the Draft IS/MND, construction is scheduled to occur for a period of 17 months beginning in fall 2026 and ending in spring 2028.
- R7-4** The comment states that the commenter has rights under the judiciary system. The comment is not related to the content of the IS/MND. No response is warranted.
- R7-5** The comment states that the residents and the City should come up with an agreement. The comment is not specific on what the agreement would concern and is not related to the content of the IS/MND. No response is warranted.

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Comment Letter R8

Subject: City and Water District Projects

On Tue, Feb 11, 2025 at 5:21 PM Ameae M Walker <ameae.walker@ucr.edu> wrote:

Agreeing with everything my neighbors have said and adding a little:

Our unit at 21720 Wesley is permanently occupied and so we have had to suffer the noise, the dirt and horrible view from various projects on a daily basis for many years. As a corner end unit, we overlook the construction site for the "Lift station 2 (LS2)" project, as well as the Caltrans staging area in the carpark across the creek and the older staging area for the tunnel project that is now full of extra equipment and supplies for the LS2 project. As a group of residents, we have been very patient and accommodating to the needs of the greater community. Indeed, I cannot imagine another group of Laguna Beach residents who would have been so tolerant for the last **9 years, with another year or so to go until the LS2 and Caltrans projects are complete! It is just not fair to add on yet more years for the new sewer, not to mention the terrible idea of returning the creek (South Laguna Wetlands) to its natural state and building a nature center in the current car park/park. Working on the proposed sewer project at night would mean that our sleep will be constantly disturbed because the work will be right underneath our windows. I think everyone seems to forget about our existence because they don't look up when on Country Club drive and only think about guests going to the Ranch as being impacted. Guests at the Ranch are less impacted by all of this because the Ranch is around a corner and the hillside and fencing reduce noise and ugly sightings.**

R8-1

R8-2

R8-3

R8-4

R8-5

I have a number of suggestions for the sewer project:

1. Explore the possibility of placing the sewer pipeline elsewhere. Another canyon? A roadway? If that is not simply not feasible, then
2. Start the project ASAP so it **coincides** with current work. This would at least reduce adding yet more years to our long period of suffering. Even then
3. Move the staging area to an alternate site – maybe the other end of the project so the noise and dirt is less for us.
4. If it cannot go anywhere but through the Aliso Creek canyon, explore the possibility of moving the pipeline to the other side of the creek. Although this will not eliminate all dirt and noise and ugliness, it would reduce disruption of traffic going to/from The Ranch and work could be performed during the day, which means we will be able to sleep.

R8-6

R8-7

R8-8

R8-9

As you can tell, we are at our Wits' End and appeal to all concerned to take our collective distress seriously.

R8-10

I have commented to the city on one of these projects before and then, when listening in to the council meeting was distressed to hear someone announce that the residents seemed unconcerned because no-one had commented!!!! Let that not be the case again. Moreover, as the most impacted residents, we vehemently oppose the South Laguna Wetlands project for many practical reasons in addition to our quality of life reasons. I would be happy to elaborate.

R8-11

Sincerely,

Ameae Walker

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Response to Comment Letter R8

Ameae Walker, Resident
February 11, 2025

- R8-1** The comment states that the commenter's condo overlooks the Lift Station (LS) 2 Project and California Department of Transportation staging area and that they have dealt with noise, dirt, and visual impacts for years. The comment is not related to this project or the content of the IS/MND. No response is warranted. Please see Thematic Response 3 for a discussion of construction impacts not related to the project.
- R8-2** The comment states that the residents near ongoing construction have been tolerant for 9 years and it is not fair that there will be more construction. Please see Thematic Response 3 for a discussion of construction impacts not related to the project. As demonstrated throughout the draft IS/MND for the proposed project, all impacts would be less than significant.
- R8-3** The comment states that returning the South Laguna Wetlands to its natural state and building a nature center in the current car park/park is a terrible idea. The comment is not related to the project or the content of the IS/MND. No response is warranted.
- R8-4** The comment states that night construction under the project would disturb the commenter's sleep because it would be right under their windows. Please see Thematic Response 2 for a discussion of noise impacts during nighttime construction.
- R8-5** The comment states that everyone forgets about the residents and only think about impacts to guests of The Ranch, who are less impacted because they are around the corner and the hillside and fencing reduces noise and visual impact to The Ranch. A predictive noise analysis was conducted for each segment of the proposed project alignment to assess the construction noise level at a representative residential distance of 50 feet. Please see Thematic Response 2 for a discussion of construction noise levels.
- R8-6** The comment suggests placing the pipeline elsewhere, for example another canyon or a roadway. The project involves the replacement of Reach 5 of an existing multi-reach pipeline that leads to the existing South Orange County Wastewater Authority Coastal Treatment Plant. As such, the alignment must connect to the existing Reach 4 and to the plant and therefore must be located such that those connections can be made. Please see Thematic Response 4 regarding the necessity of the project.
- R8-7** The comment suggests that construction of the project occur as soon as possible to coincide with current work. Construction of the project cannot occur until a variety of approvals and permits are in place. See Section 2.5, Project Approvals, of the Draft IS/MND. The City has developed a construction start date that reasonably accounts for the time required to obtain all required approvals, finalize design, and choose and mobilize a construction contractor. Additionally, there are several constraints preventing the overlap of construction activities associated with the LS 2 Project and the proposed project. Primarily, because the proposed project connects into LS 2, the construction of the LS 2 Project must be completed first. Additionally, there is not adequate space available in the area for heavy equipment associated with both projects to operate simultaneously. Aside from the physical constraints preventing construction overlap, the two projects are under the jurisdiction of two separate entities (LS 2 is a South Coast Water District project and the proposed project is a City project).

- R8-8** The comment suggests moving the staging area to an alternate site to reduce noise and dirt for residents. Construction staging for the project would not be located directly adjacent to residences where current construction staging areas are located. Please see Thematic Response 1 for a discussion of project staging areas.
- R8-9** The comment suggests moving the project alignment to the other side of Aliso Creek to reduce disruption to residents and eliminate the need for night construction. Please see Thematic Response 4 regarding the robust alternatives analysis that was conducted. The south side of the creek contains sheer rock formations (vertical rock faces) along with existing The Ranch buildings fronting the creek. Aligning a new pipe south of the creek is infeasible.
- R8-10** The comment states that the commenter is frustrated and wants their concerns heard. The comments will be presented to the Planning Commission and City Council for their consideration in whether to approve the project.
- R8-11** The comment states that the commenter opposes the South Laguna Wetlands project. The comment is not related to the project or the content of the IS/MND. No response is warranted.

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Response to Comment Letter R9

Tad Bogdan, Resident
February 12, 2025

- R9-1** The comment describes the construction schedule for the Lift Station (LS) 2 Project and states that residents have lived with the LS 2 Project going past the anticipated construction completion date. Please see Thematic Response 3 for a discussion of construction impacts not related to the project.
- R9-2** The comment describes the construction schedule for the proposed project, as stated in the Draft IS/MND. It does not present a comment related to the analysis or conclusions of the Draft IS/MND. No response is warranted.
- R9-3** The comment states that the commenter's homeowner's association has been living with dust, noise, and visual impacts from the LS 2 Project and they want it to end. The commenter suggests that construction of the proposed project could have been planned to overlap with the current construction and references Ameae Walker's suggestions (see Comment Letter R8). Please see Thematic Response 3 for a discussion of construction impacts not related to the project.

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Response to Comment Letter R10

Ameae Walker, Resident
February 22, 2025

- R10-1** The comment states that the project is considered in isolation in the Draft IS/MND and does not take into account that construction of the Lift Station (LS) 2 Project has been impacting local residents for 10 years. The impacts of the LS 2 Project were assessed in a separate environmental document and are separate from the proposed project. Please see Thematic Response 3 for a discussion of construction impacts not related to the project.
- R10-2** The comment states that the commenter has heard that a suggestion to construct the proposed project concurrently with ongoing construction of LS 2 has been rejected and that residents deserve compromise. Concurrent construction of the proposed project with the ongoing construction of the LS 2 Project is infeasible for several reasons. Primarily, because the proposed project connects into LS 2, the construction of the LS 2 Project must be completed first. Additionally, there is not adequate space available in the area for heavy equipment associated with both projects to operate simultaneously. Aside from the physical constraints preventing construction overlap, the two projects are under the jurisdiction of two separate entities (LS 2 is a South Coast Water District project and the proposed project is a City project).
- R10-3** The comment states that impacts on Crotch's bumble bee are ranked higher than impacts on residents. The analysis in the Draft IS/MND has been conducted according to Appendix G of the CEQA Guidelines, which requires the assessment of biological resources along with 19 other resource areas. There is no ranking of importance associated with the various resource areas.
- R10-4** The comment states that there will be night work associated with the project for 34 weeks, which will disrupt sleep, and suggests rerouting the alignment to the other side of the creek. Night work would be for 12 weeks. Please see Thematic Response 2 for a discussion of construction noise levels, including during nighttime construction. Please see Thematic Response 4 regarding the robust alternatives analysis that was conducted. The south side of the creek contains sheer rock formations (vertical rock faces) along with existing The Ranch buildings fronting the creek. Aligning a new pipe south of the creek is infeasible.
- R10-5** The comment requests that the City coordinate with the power company to underground power lines while trenches are open for construction of the proposed project. Southern California Edison has an ongoing and separate effort to underground power lines in the project area. The proposed project would be completed by the City to specifically address the replacement of Reach 5 of the NCI in an alignment designed around a variety of constraints. The project is not designed to accommodate the undergrounding of power lines and the request is outside of the scope of the project and the City's jurisdiction.

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Comment Letter R11

Subject: Laguna Beach Sewer Project

From: Laura Markarian <lauramarkarian@gmail.com>
Sent: Monday, February 24, 2025 12:40 PM
To: Escalona, Ulises PW <uescalona@lagunabeachcity.net>
Cc: Rounaghi, Alex <arounaghi@lagunabeachcity.net>; Seema Tailor <tailor92603@gmail.com>; Gena Douzdjian <douzdjian@comcast.net>; Pilar Rueda <pilarr@att.net>; Ray & Fadia Wahid <raywahid@yahoo.com>; Veronica Abusleme <drvero01@aol.com>; Rochelle Gerson <rmogerson16@gmail.com>; Alan Gerson <ahg@enteractivesolutions.com>; Tim Dowling <timothyddowling@gmail.com>; Princess Lily  Wife <lilydowlingla@gmail.com>; Tad Bogdan <tadbogdan@gmail.com>; Monique H Bogdan <moniquebogdan@gmail.com>; Gina Carney <copperheadstudio@gmail.com>; Richard A Luben <richard.luben@ucr.edu>; Ameae M Walker <ameae.walker@ucr.edu>
Subject: Laguna Beach Sewer Project

[NOTICE: This message originated outside of City of Laguna Beach -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Good afternoon,

I am reaching out regarding the ongoing Laguna Beach City Sewer projects. My neighbors and I have previously shared our concerns via email, and I wanted to follow up with additional information. This morning, I woke up to the attached photos, which, unfortunately, don't capture the accompanying noise — the constant beeping. This is part of the SCWD project which has been ongoing for nearly 9 years.

R11-1

Once again, I urge the city to explore an alternative solution for the Sewer Project as we've been dealing with this disruption for nearly nine years now.

R11-2

Thank you for your attention to this matter.

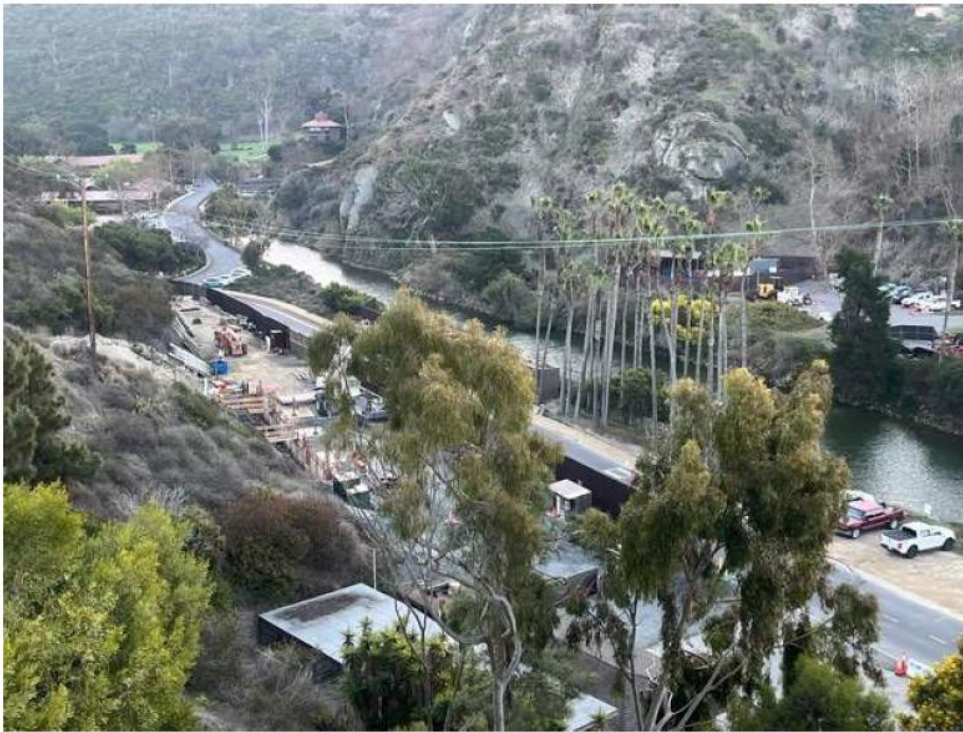
Laura Markarian

lauramarkarian@gmail.com

949-371-7500







Laura Markarian
lauramarkarian@gmail.com
949-371-7500

Response to Comment Letter R11

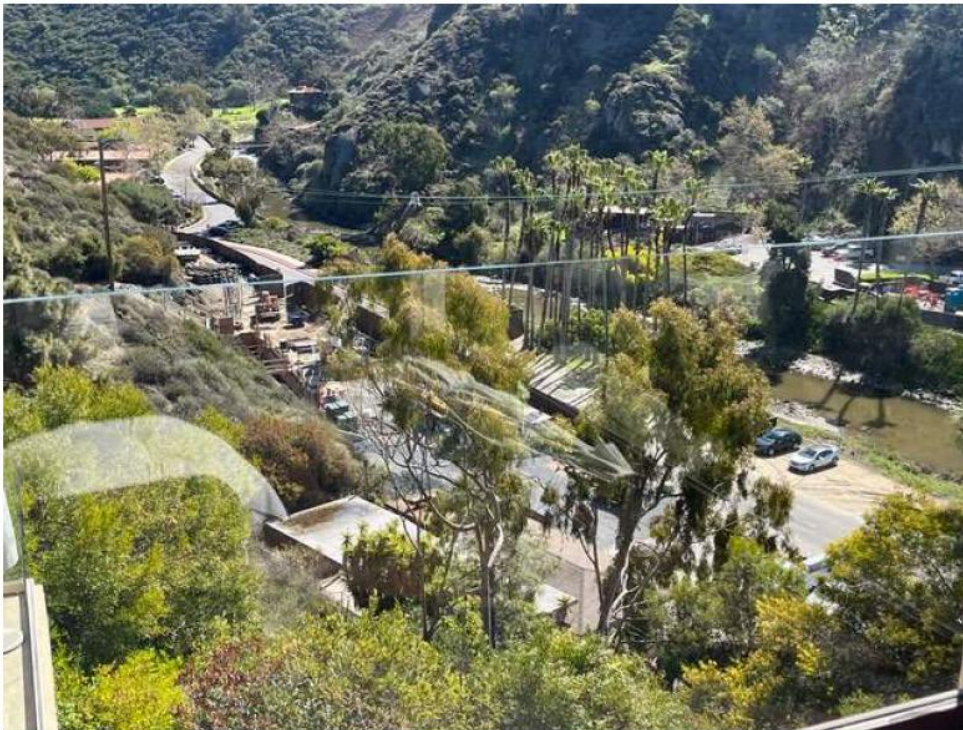
Laura Markarian, Resident
February 24, 2025

- R11-1** The comment states that the commenter has included photographs of ongoing construction and that there has been accompanying noise for nearly 9 years. Please see Thematic Response 3 for a discussion of construction impacts not related to the project.
- R11-2** The comment urges the City to explore an alternative to the proposed project. The proposed project would replace one reach of the existing NCI that was built in the 1970s and has a high potential for failure. Please see Thematic Response 4 regarding the robust alternatives analysis that was conducted.

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I R12-1





Laura Markarian
lauramarkarian@gmail.com
949-371-7500

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Response to Comment Letter R12

Laura Markarian, Resident
March 9, 2025

- R12-1** The comment includes photographs of ongoing construction and urges the City to find a different staging area for the proposed project. The staging areas for the proposed project would not be the same as existing staging areas. Please see Thematic Response 1 for a discussion of project staging areas.

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Comment Letter T1

Subject: North Coast Interceptor reach 5 replacement project

From: Christina Marsden Conley <christina.marsden@alumni.usc.edu>

Sent: Tuesday, February 4, 2025 2:18 PM

To: Escalona, Ulises PW <uescalona@lagunabeachcity.net>

Subject: North Coast Interceptor reach 5 replacement project

[NOTICE: This message originated outside of City of Laguna Beach -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Good afternoon,

We are in receipt of this project. Will you please keep us updated on the project status as there are some concerns.

T1-1

Take care,
Christina

tehoovet taamet

CHRISTINA CONLEY

•Tribal Cultural Resource Administrator Under Tribal Chair, Robert Dorame

•Native American Heritage Commission contact

•UCLA Scholar-in-Residence

•CSUDH NAGPRA Oversight Committee

•Catalina Tribal Coalition

•Coalition of California of State Tribes, Executive Board

https://file.lacounty.gov/SDSInter/lac/1137966_AREPORTONHARMSCountyofLosAngeles.pdf



GABRIELINO TONGVA INDIANS OF CALIFORNIA

The Gabrieliño Tongva Indians of California tribe is a direct descendant, traditionally and culturally recognized in the State of California as the aboriginal tribe to encompass the entire Los Angeles Basin area to Laguna Beach, extending to the Channel Islands of Santa Catalina, San Nicholas and San Clemente Islands

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Response to Comment Letter T1

Christina Conley, Gabrieleño Tongva Tribe
February 4, 2025

T1-1 The City will keep the Gabrieleño Tongva tribe informed of the project.

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Comment Letter T2

Subject: Notice of Intent to Adopt a Mitigated Negative Declaration for the North coast
interceptor Reach 5 Replacement Project

From: Gabrieleno Administration <admin@gabrielenoindians.org>
Sent: Monday, February 10, 2025 10:43 AM
To: Escalona, Ulises PW <uescalona@lagunabeachcity.net>
Subject: Notice of Intent to Adopt a Mitigated Negative Declaration for the North coast interceptor Reach 5
Replacement Project

[NOTICE: This message originated outside of City of Laguna Beach -- DO NOT CLICK on links or
open attachments unless you are sure the content is safe.]

Hello Ulises

Thank you for oyur letter. We would like to consult on the above project.

I T2-1

Best regards,

Brandy Salas

Gabrieleño Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org



The region where Gabrieleño culture thrived for more than twelve thousand years encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing herds of livestock. The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area. That's a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleño, the community simply would not have survived.

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Response to Comment Letter T2

Brandy Salas, Gabrieleño Band of Mission Indians
February 10, 2025

T2-1 The Gabrieleño Band of Mission Indians – Kizh Nation engaged in consultation on this project with the City from April 16, 2024, to October 24, 2024. The details of this consultation are included in Section 3.18, Tribal Cultural Resources, of the Draft IS/MND.

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Comment Letter A1



DYLAN WRIGHT
DIRECTOR
OC COMMUNITY RESOURCES

CYNANTHA ATKINSON
ASSISTANT DIRECTOR
OC COMMUNITY RESOURCES

JOANNEVE EDOR
DIRECTOR
ADMINISTRATIVE SERVICES

MONICA SCHMIDT
DIRECTOR
OC ANIMAL CARE

JULIA BISHWELL
DIRECTOR
OC HOUSING & COMMUNITY
DEVELOPMENT

RENEE RAMIREZ
DIRECTOR
OC COMMUNITY SERVICES

PAM RABOW
DIRECTOR
OC PARKS

JULIE QUILLMAN
COUNTY LIBRARIAN
OC PUBLIC LIBRARIES

ocparks
13042 OLD MYFORD ROAD
IRVINE, CA 92602
PHONE: 866.OC PARKS

OC Community Resources

February 26, 2025

Mr. Ulises Escalona
City of Laguna Beach
505 Forest Avenue
Laguna Beach, California 92651

Subject: North Coast Interceptor Reach 5 Replacement Project IS/MND
Comments

Dear Mr. Escalona,

Please see comments from OC Parks on the IS/MND for the North Coast Interceptor Reach 5 Replacement Project detailed below in this letter.

- A portion of the project is located on OC Parks property within the Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) reserve, and the City of Laguna Beach is not a signatory to the NCCP/HCP plan. OC Parks needs to better understand how the City of Laguna Beach will bear any NCCP/HCP impacts associated with the project. Any project-related mitigation (short or long term) or habitat "take" shall not be the responsibility of OC Parks. A1-1
- Any impacts to the NCCP/HCP should also be reviewed by the Natural Communities Coalition (NCC), the organization which implements the NCCP/HCCP and the appropriate regulatory agencies. James Sulentic, Executive Director, can be reached at jsulentic@occonservation.org. A1-2
- Any alterations or impact to OC Parks property shall require review and approval from OC Parks in the form of a formal agreement. In order to evaluate the impacts, OC Parks Staff needs to better understand all temporary/permanent construction impacts to OC Parks parcels, which could lead to further comment. A1-3
- The IS/MND indicates that both temporary construction and permanent access easements from the County of Orange (OC Parks) will be required as part of the Project. OC Parks Staff has not been engaged on the requested easements. Such requests will require ample time for review, comment, and may require adoption by the County Board of Supervisors. Please be aware that any existing easements the City holds with the County (OC Parks) may need to be adjusted to reflect the Interceptor Reach 5 Replacement Project. A1-4

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Response to Comment Letter A1

Cynthia Malko, OC Parks
February 26, 2025

A1-1 The comment includes information contained in Section 3.4 of the Draft IS/MND that a portion of the project is located on OC Parks property within the Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) Reserve. The comment also states that the City of Laguna Beach is not a signatory to the NCCP/HCP plan, a detail which has been corrected and included in the Final IS/MND. The comment asks for an understanding of how the City will address impacts within the NCCP/HCP and states that project-related mitigation is not OC Parks' responsibility.

Because the City is not a signatory to the NCCP/HCP, the City has been working with OC Parks over the past year (from May 2025 to May 2026) to develop an approach to the impacts to OC Parks land in the Reserve due to this project. At the request of OC Parks, with approval and consent of the City, OC Parks will request for approval by the U.S. Fish and Wildlife Service of a Minor Amendment to the Orange County Central and Coastal NCCP/HCP (Central-Coastal NCCP/HCP) to allow for the installation of an isolation valve vault on Reserve lands as a part of the project. The project is being implemented by the City Public Works and Utilities Department, and the valve vault would be installed within the Central-Coastal NCCP/HCP boundary on Reserve lands owned by OC Parks.

The focus is on a portion of the project alignment within Aliso and Wood Canyons Wilderness Park, which is on Central-Coastal NCCP/HCP Reserve lands owned by OC Parks. Permanent impacts to 0.05 acres of a disturbed area mapped as wild oats and annual brome grasslands will result from the installation of a valve vault. Temporary impacts will occur as a result of trenching work associated with pipe installation, totaling 0.43 acres, including 0.18 acres to disturbed coyote brush scrub, 0.03 acres of wild oats and annual brome grasslands, and 0.22 acres urban/developed lands, consisting of existing paved roadways and portions of the South Orange County Wastewater Authority Coastal Treatment Plant. Permanent and temporary impacts to Reserve lands are summarized in Table 2 and depicted on Figure 3.4-1a.

Table 2. Project Impacts to Vegetation Communities and Land Covers on Orange County Park Lands in the Central-Coastal NCCP/HCP Reserve (Acres)

Vegetation Community or Land Cover	Alliance	Association	Perm Impacts	Temp Impacts	Total Impacts
Coyote brush scrub	<i>Baccharis pilularis</i> shrubland alliance	<i>Baccharis pilularis</i> - <i>Artemisia californica</i> association	0	0.18	0.18
Wild oats and annual brome grasslands	<i>Avena</i> spp.- <i>Bromus</i> spp. herbaceous semi-natural alliance	<i>Bromus diandrus</i> association	0.05	0.03	0.07
Urban/developed	N/A	N/A	0	0.22	0.22

Table 2. Project Impacts to Vegetation Communities and Land Covers on Orange County Park Lands in the Central-Coastal NCCP/HCP Reserve (Acres)

Vegetation Community or Land Cover	Alliance	Association	Perm Impacts	Temp Impacts	Total Impacts
		Total	0.05	0.43	0.48

Note: Central-Coastal NCCP/HCP = Orange County Central and Coastal Natural Communities Conservation Plan/Habitat Conservation Plan; N/A = not applicable.

Permanent impacts within the Reserve will occur in an extremely small area (0.05 acres) that has been subjected to regular disturbance for several decades, including prior to the development of the Central-Coastal NCCP/HCP in 1996. Historical aerials from 1995 and earlier show the area to be regularly disturbed, including grading in some years (Google Earth 2025). Since 1995, while the area has occasionally shown signs of recovery, it has been regularly cleared of vegetation, with recent evidence of annual vegetation clearing and mowing in 2023, 2024, and 2025. Currently, the permanent impact area is vegetated with limited amounts of non-native grasses and forbs and is regularly used as a vehicle turnout for the adjacent Aliso Canyon Road. As a result, this area does not contribute to the subregional habitat value of the Reserve.

Although the valve vault site provides no functional value for the Reserve, the City is proposing off-site restoration of approximately 0.27 acres of Reserve lands to compensate for the loss of 0.05 acres of OC Parks lands within the Reserve. The proposed mitigation site currently is dominated by black mustard (*Brassica nigra*) and several non-native grasses (*Bromus* spp., *Festuca* spp., and *Hordeum* spp.). The site is bounded by mature coastal sage scrub to the north, east, and south, and historical aerial imagery indicates the proposed site previously supported scrub habitat as recently as 2015, the remnants of which were observed during the field assessment in the form of scattered coastal sage scrub species, such as California sagebrush (*Artemisia californica*), California brittlebush (*Encelia californica*), and California four o'clock (*Mirabilis laevis* var. *crassifolia*). The proposed mitigation site also currently supports a modest abundance of native forbs, such as hollowleaf annual lupine (*Lupinus succulentus*) and coastal bird's-foot trefoil (*Acmispon maritimus*); however, non-native grasses and forbs are the dominant species. A memorandum prepared describing the proposed restoration effort, including photographs of the mitigation site, is included as Appendix A to this Final MND.

Temporarily impacted native vegetation within the Reserve, which consists of approximately 0.18 acres of coastal sage scrub, will be revegetated and restored to its original condition following construction. The temporary impact area currently supports coastal sage scrub, but it is disturbed by regular human use, with trails and non-native species present throughout the area. Revegetation efforts will include initial site preparation to de-compact soils and the application of a non-irrigated seed mix containing characteristic coastal sage scrub species that are locally appropriate based on their presence in adjacent reference habitat. Signage and temporary rope-and-post fencing will be installed along the perimeter to deter encroachment during reestablishment. Further details regarding the revegetation effort are included in Appendix A to this Final MND.

Focused rare plant surveys were conducted during the appropriate blooming period for 39 rare plants determined to have a moderate to high potential to occur in the study area. One plant species that is an Identified Species was observed during these surveys: Nuttall's scrub oak (*Quercus dumosa*). However, all

observations were outside of the Reserve, and this species is not expected to be affected by project activities within the Reserve. One wildlife species that is an Identified Species was observed during surveys conducted for the project site: red-shouldered hawk (*Buteo lineatus*). In addition, several Identified Species were identified as having at least a moderate potential to occur on the project site: orange-throated whiptail (*Aspidoscelis hyperythra*), red diamond rattlesnake (*Crotalus ruber*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), Blainville's horned lizard (*Phrynosoma blainvillii*), Coronado skink (*Plestiodon skiltonianus interparietalis*), coastal California gnatcatcher (*Polioptila californica californica*), least Bell's vireo (*Vireo bellii pusillus*), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), and San Diego desert woodrat (*Neotoma lepida intermedia*).

Focused surveys for least Bell's vireo and coastal California gnatcatcher conducted in suitable habitats on the project site and a 100-foot buffer were negative. As such, least Bell's vireo and coastal California gnatcatcher are considered absent from the project site and surrounding study area, including the coastal sage scrub habitat on Reserve lands that would be temporarily impacted. However, there is potential for gnatcatcher to occupy the coastal sage scrub on and surrounding the project site and for vireo to occupy the riparian areas within 500 feet of the project site in the future. In addition, although none were observed during surveys conducted on the site, the Identified Species discussed above could be present during construction.

Because no native habitat within the Reserve will be permanently lost as result of the project and the area that will be permanently lost provides limited functionality as habitat for native plants and wildlife, the Identified Species with a potential to occur in the Reserve portion of the project site will not be affected by project-related habitat loss. The loss of or harm to individuals during construction of the project will be avoided or minimized through implementation of mitigation measures incorporated into the project's MND, including Mitigation Measure (MM) BIO-2 (Coastal California Gnatcatcher and Least Bell's Vireo Avoidance), MM-BIO-4 (Special-Status Wildlife Species Avoidance), and MM-BIO-6 (Nesting Bird Avoidance). Potential impacts during the operation and maintenance activities associated with the facility will be avoided and minimized through implementation of Avoidance and Minimization Measure (AMM) BIO-1 (Operations and Maintenance).

AMM BIO-1 Operations and Maintenance. To the extent feasible, operations and maintenance at the valve vault located on Orange County Central and Coastal Natural Communities Conservation Plan/Habitat Conservation Plan Reserve lands shall be conducted outside the breeding season (March 15 through September 1). The City of Laguna Beach shall prepare an operations and maintenance plan, to be submitted to the Reserve owner/manager. The plan shall include, at a minimum, expected patrol and maintenance time intervals; describe, to the extent practicable, routine repair/maintenance activities and location; describe areas and procedures to be used for routine weed abatement and clearing; and include any other anticipated operational activities.

In addition, as is described in the Draft IS/MND, a temporary construction easement and permanent access easement will be required on those portions of the project alignment that are on OC Parks lands. The project would be subject to requirements for impacts to OC Parks lands within the Reserve that are included as a part of this easement agreement.

- A1-2** The comment states that impacts to the NCCP/HCP should be reviewed by the Natural Communities Coalition (NCC) and provides contact information for the NCC. As discussed in response to comment A1- 1, project components occurring on OC Parks lands (i.e., the Reserve) would be subject to NCC review and approval of a Minor Amendment to the NCCP/HCP to address impacts to the NCCP/HCP Reserve.
- A1-3** See response to comment A1-1.
- A1-4** The City is coordinating with property owners on easements and will reach out to OC Parks with regard to any permanent or temporary access easements that may be necessary for the project.
- A1-5** The comment notes that focused southwestern pond turtle (*Actinemys marmorata*; California Department of Fish and Wildlife [CDFW] Species of Special Concern [SSC]) surveys were not conducted for the project. It also requests clarification on measures that would be taken during project implementation to reduce impacts to the species. The project will avoid impacts to aquatic habitat and streambanks associated with the creek, where the species is primarily expected to occur. Additionally, Mitigation Measure (MM)-BIO-4 requires biological monitoring of construction activities. The measure has been modified to include specific considerations for southwestern pond turtle, such as a qualified turtle biologist, pre-construction visual surveys, and exclusionary fencing around suitable pond turtle nesting sites within 500 feet of the creek. The measure also includes daily monitoring, pre-construction sweeps ahead of construction, and relocation of special-status wildlife out of harm's way.
- A1-6** The comment references the recently installed SCE underground powerline and its potential impact on the alignment of the proposed pipeline. The City's design team was on site during the SCE underground work in February 2023 work and coordinated the installation specifically outside the limits of the proposed pipeline to avoid future conflicts.
- A1-7** See Response to A1-6.
- A1-8** The comment states that detailed construction plans for the project need to be shared with OC Parks for review and approval. This comment is acknowledged. The City will keep OC Parks apprised of project information and will share detailed construction plans are part of any permit approval process.



AFFILIATED AGENCIES

*Orange County
Transit District*

*Local Transportation
Authority*

*Service Authority for
Freeway Emergencies*

*Consolidated Transportation
Service Agency*

*Congestion Management
Agency*

February 26, 2025

**Mr. Ulises Escalona
City of Laguna Beach
505 Forest Avenue
Laguna Beach, CA 92651**

Via email: uescalona@lagunabeachcity.net

**Subject: Notice of Intent to Adopt a Mitigated Negative Declaration for
the North Coast Interceptor Reach 5 Replacement Project**

Dear Mr. Escalona:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to review the Notice of Intent to adopt a Mitigative Negative Declaration for the North Coast Interceptor Reach 5 Replacement Project (project). It appears that a portion of this project may be proposed to cross and impact the southeastern portion of the OCTA Pacific Horizon Preserve (Preserve) (APN 056-240-68). OCTA requests that all proposed impacts be clearly delineated in relation to the existing easement (for the South Laguna Sanitary District) and Preserve boundary.

A2-1

This Preserve is a 151-acre parcel that is one of seven open space properties that are part of the OCTA Natural Community Conservation Plan/Habitat Conservation Plan (Conservation Plan) certified by the California Department of Fish and Wildlife, and the US Fish and Wildlife Service (Wildlife Agencies). Please see Attachments A and B for a depiction and fact sheet of the Preserve. The Preserve is owned, maintained, and required to be permanently protected by OCTA. Please note, if portions of the Preserve are impacted by the proposed project, approvals will be necessary from OCTA and the Wildlife Agencies and compensatory mitigation may be required to offset impacts.

A2-2

The OCTA Preserves and the Conservation Plan is part of a program known as OCTA's OC Go, formerly known as Measure M and Measure M2 Environmental Mitigation Program. This program allocates funds for land and habitat projects in exchange for streamlining project approvals with state and federal Wildlife Agencies for the larger freeway improvement projects throughout Orange County. This comprehensive mitigation approach provides replacement habitat and the opportunity to improve overall biological resources throughout Orange County.

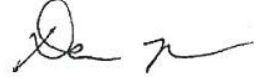
A2-3

*Orange County Transportation Authority
550 South Main Street / P.O. Box 14184 / Orange / California 92863-1584 / (714) 560-OCTA (6282)*

Mr. Ulises Escalona
February 26, 2025
Page 2

Please contact OCTA to further discuss this project and any impacts proposed to this protected property. You can reach me by phone at (714) 560-5907 or by email at dphu@octa.net.

Sincerely,



Dan Phu
Manager, Environmental Programs

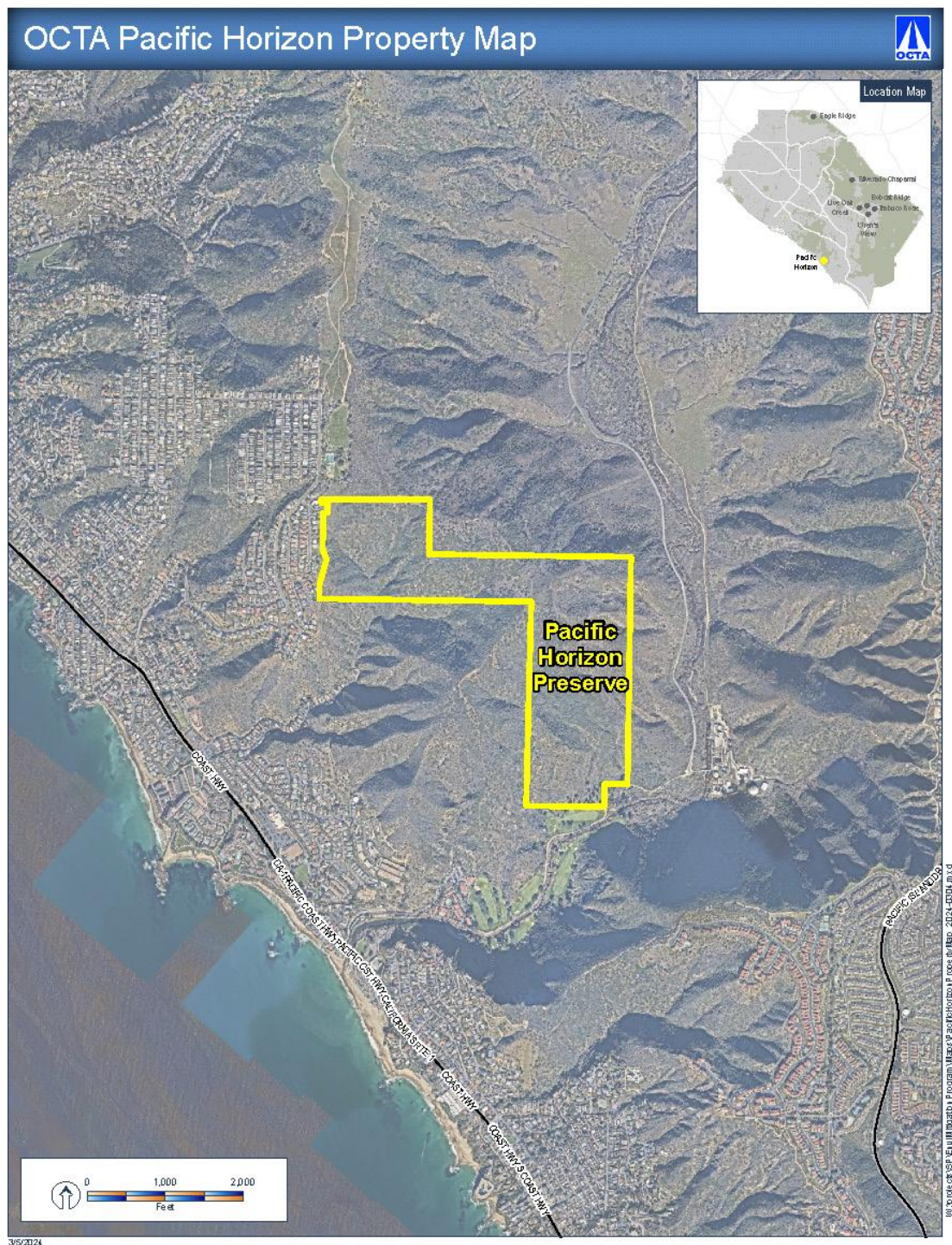
DP:tc

Attachments:

Attachment A – Pacific Horizon Preserve Map
Attachment B – Pacific Horizon Fact Sheet

Cc: Bill Mock, OCTA

*Orange County Transportation Authority
550 South Main Street / P.O. Box 14184 / Orange / California 92863-1584 / (714) 560-OCTA (6282)*



Attachment B



PACIFIC HORIZON PRESERVE

ENVIRONMENTAL MITIGATION PROGRAM

OCTA's OC Go, formerly Measure M, Freeway Environmental Mitigation Program (EMP) provides comprehensive mitigation to offset the environmental impacts of all OC Go-funded freeway improvement projects.

The EMP presents a comprehensive mitigation approach that provides not only replacement habitat, but also the opportunity to improve the overall functions and value of sensitive biological resources throughout Orange County.

Based on the evaluation of mitigation opportunities in the County, priority conservation areas were identified, including candidate parcels and properties that could be considered for wilderness preservation purposes. Properties were then selected for acquisition and restoration. These properties were selected to enhance wildlife connectivity, safeguard sensitive species and preserve substantial parcels of valuable habitat.



Indian Paintbrush and California Sagebrush

ABOUT THE PRESERVE

The Pacific Horizon Preserve is a 151-acre parcel located in the Southeast portion of the City of Laguna Beach. It is adjacent to Aliso and Wood Canyons Wilderness Park, as well as Moulton Meadows Park. The Preserve features a variety of habitats, including chaparral, grassland, and coastal sage scrub.

The California Department of Fish and Wildlife database has identified several special status plant and animal species within a one-mile radius of the study area. They include but are not limited to:

- Orange-Throated Whiptail
- Tidewater Goby
- Coast (San Diego) Horned Lizard
- Least Bell's Vireo
- Southwestern Pond Turtle
- Northern Harrier
- American Peregrine Falcon
- Coastal California Gnatcatcher
- Foothill Mariposa Lily
- Catalina Mariposa Lily
- Many-stemmed Dudleya
- Laguna Beach Dudleya
- Cliff Spurge
- Nuttall's Scrub Oak
- Crownbeard

The general unsullied nature of the terrain allows for several important wildlife movement corridors for deer, coyotes, brush rabbits, Beechey ground squirrels, Botta pocket gophers and more. The Preserve serves as the final open space connection between the south end of the Laguna Greenbelt, Aliso and Wood Canyons Wilderness Park, and the sea. OCTA's acquisition of Pacific Horizon will allow for the area to be preserved as open space, ensuring the preservation of wildlife mobility as well as various sensitive species in the area.



ORANGE COUNTY TRANSPORTATION AUTHORITY

Response to Comment Letter A2

Dan Phu, Orange County Transportation Authority
February 26, 2025

- A2-1** The comment states that the project site may cross and impact the Orange County Transportation Authority (OCTA) Pacific Horizon Preserve (Preserve) and requests that all proposed impacts to the Preserve be clearly defined. The proposed project alignment would have a small overlap with the Preserve. The City met with OCTA to discuss this overlap on March 31, 2025. After discussion with OCTA, the City will commit to containing this overlap entirely within the existing access road and would not impact vegetation. To ensure that construction does not impact vegetation within the Preserve, fencing with protective screening would be installed along the access road within the Preserve parcel to protect the vegetation.
- A2-2** The comment describes the Preserve and its part in the OCTA Natural Community Conservation Plan/Habitat Conservation Plan (Conservation Plan) and notes that OCTA and wildlife agency approvals will be required if the project impacts the Preserve and potentially compensatory mitigation. To ensure that construction does not impact vegetation within the Preserve, fencing with protective screening would be installed along the access road within the Preserve parcel to protect the vegetation.
- A2-3** The comment explains that the Preserve and Conservation Plan are part of the OC Go program, which allocates funds for habitat preservation projects in exchange for a streamlined project approval process for larger freeway improvements in Orange County by state and federal wildlife agencies. It is not a specific or substantive comment related to the adequacy of the Draft IS/MND. No response is warranted.

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Comment Letter A3

Subject: OC Parks Comment Letter on MND for the North Coast Interceptor Reach 5 Replacement Project
Attachments: Figure 1-2 Bio Impacts OC Parks.pdf; Impacts_Veg_Alignment_OC_Parks_20250225.xlsx; SnipImage.JPG; SnipImage.JPG; SnipImage.JPG

From: Malko, Cynthia <cynthia.malko@ocparks.com>
Sent: Monday, March 24, 2025 11:55 AM
To: Escalona, Ulises PW <uescalona@lagunabeachcity.net>
Cc: Kurnow, Brian <Brian.Kurnow@ocparks.com>; Sawaya, Pierre PW <psawaya@lagunabeachcity.net>; Gonzales, Richard PW <rgonzales@lagunabeachcity.net>
Subject: RE: OC Parks Comment Letter on MND for the North Coast Interceptor Reach 5 Replacement Project

[NOTICE: This message originated outside of City of Laguna Beach -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Hi Ulises,

Hope you are well. Below, please see additional comments OC Parks has on the additional material attached.

- 1) This Bio-Impacts map (first attachment) does not appear to be the same as the map provided in the Initial Study/Mitigated Neg Dec. The Bio-Impact map has the slipline going along the bridge into the SOCWA plant but still shows the "project alignment" the same as the IS/MND which has the impacts crossing higher up the creek. Which is correct? See third and fourth attachments.
- 2) Is there a reason why project permanent impacts are not concentrated to the nonnative habitat areas (Brodia)?
- 3) What are the restoration plans for the temporary and permanent impacts?
- 4) What are the plans for the infrastructure that appears to already be in the project boundary (fifth attachment)? There appear to be bollards protecting infrastructure or utilities.
- 5) Were baseline studies of the percentage of vegetation (native and nonnative) conducted in relation to the temporary and permanent impacts?

A3-1

A3-2

A3-3

A3-4

A3-5

Thank you,



Cynthia Malko
 Entitlement Project Manager
Office: (949) 923-3796 **Cell:** (714) 227-6720
 13042 Old Myford Road, Irvine, CA 92602

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Response to Comment Letter A3

Cynthia Malko, OC Parks
March 24, 2025

- A3-1** The comment states that the Bio-Impacts map does not match the impacts provided in the Draft IS/MND. Figures in the Final MND have been updated to include the revised project design and alignment, as well as boundaries for the Orange County Central and Coastal Natural Communities Conservation Plan/Habitat Conservation Plan Reserve. The revised alignment is depicted in updated Figures 3.4-1a through c, and the figures in the Final IS/MND have also been updated to reflect these changes and are included in Chapter 3, Changes to the Draft MND.
- A3-2** The comment asks why project permanent impacts (on OC Parks lands) are not concentrated to the non-native habitat areas (i.e., those mapped as *Bromus diandrus* association). The project design has been revised to shift permanent impact areas in the Reserve from native habitats (coyote brush scrub) to non-native areas mapped as *Bromus diandrus* association.
- A3-3** The comment asks what the restoration plans are for temporary and permanent impacts. No restoration is proposed in permanently impacted areas, since by definition, these are areas that will be permanently altered. The project will revegetate temporarily impacted areas with native plants upon completion of construction work. See Appendix A to this Final MND for an explanation of the revegetation strategy to restore temporarily impacted areas within the Reserve.
- A3-4** The comment asks what the plans are for existing infrastructure within the project boundary. The hydrant and bollards belong to South Coast Water District and they will remain in place.
- A3-5** The CEQA baseline for this project was the initiation of technical studies for the project, which began in March 2024. All native and naturalized plant species encountered in the study area during biological surveys were identified and recorded, and percent cover of natives and non-natives was recorded for the overall study area (see Appendix B of the Draft MND). Percent cover was not identified within the temporary and permanent impact footprints, specifically. However, as is described in the Draft MND, temporarily impacted areas will be addressed through preparation and implementation of a revegetation plan and appropriate revegetation of the impacted areas. The revegetation plan will ensure all temporarily impacted areas are revegetated to current conditions or better, including percent native cover. In order to clarify that this is part of the project, Project Design Feature (PDF) 1 has been added to the project description as follows:

PDF-1 The City shall prepare and implement a revegetation plan to guide revegetation of all temporarily impacted areas. The plan shall include, at a minimum, site preparation plans to de-compact soils, identification of a non-irrigated seed mix containing characteristic species that are locally appropriate based on their presence in adjacent reference habitat, requirements for signage and temporary rope-and-post fencing to be installed along the perimeter to deter encroachment during reestablishment, and minimum performance standards to ensure success, including maintenance and monitoring of the site for a minimum of 2 years.

This is has been added in Chapter 3, Changes to the Draft MND.

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3 Changes to the Draft MND

3.1 Changes to Section 2.4, Project Construction and Phasing

Pp. 4–5

SCWD Lift Station 2 Intertie Vault and Emergency Interconnections (Sta. 13+00 to 19+50)

SCWD's new LS2 includes an intertie system to allow wastewater flows to be conveyed either through SCWD's LS2 force main or through the existing 24-inch NCI Reach 5. The new NCI Reach 5 will connect to the LS2 intertie vault, as shown on Figure 2-5, SCWD Lift Station 2 Intertie Vault and Emergency Interconnections – Western Portion. Only one of the two new NCI Reach 5 pipelines will connect to the intertie vault. The other pipeline will be installed around the vault and will facilitate the phased handling of sewer flows. As part of this work, 26 existing palm trees will be removed. These trees can be seen on Figure 2-5 between the proposed NCI Barrel #1 and #2.

The upstream and downstream hot-tap connections into the existing NCI will be removed and replaced with a jointless HDPE fabricated tee. The existing isolation valves may be reused for both locations upstream and downstream of the intertie vault.

Groundwater in this area is as shallow as 10 feet; therefore, dewatering of groundwater is anticipated to be required during construction of facilities in this area.

P. 8 Addition of Avoidance and Minimization Measure BIO-1 and Project Design Feature 1 to the Project Description

AMM BIO-1 **Operations and Maintenance.** To the extent feasible, operations and maintenance at the valve vault located on Orange County Central and Coastal Natural Communities Conservation Plan/Habitat Conservation Plan Reserve lands shall be conducted outside the breeding season (March 15 through September 1). The City of Laguna Beach shall prepare an operations and maintenance plan, to be submitted to the Reserve owner/manager. The plan shall include, at a minimum, expected patrol and maintenance time intervals; describe, to the extent practicable, routine repair/maintenance activities and location; describe areas and procedures to be used for routine weed abatement and clearing; and include any other anticipated operational activities.

PDF-1 The City shall prepare and implement a revegetation plan to guide revegetation of all temporarily impacted areas. The plan shall include, at a minimum, site preparation plans to de-compact soils, identification of a non-irrigated seed mix containing characteristic species that are locally appropriate based on their presence in adjacent reference habitat, requirements for signage and temporary rope-and-post fencing to be installed along the perimeter to deter encroachment during reestablishment, and minimum performance standards to ensure success, including maintenance and monitoring of the site for a minimum of 2 years.

3.2 Changes to Section 3.4, Biological Resources

Pp. 37–38

Suitable nesting and foraging habitat for this species occurs throughout the coastal sage scrub habitat on site, specifically within the vegetation communities that include California sagebrush in the study area. No coastal California gnatcatchers or nests were detected during the focused surveys for this species or during other biological surveys conducted on site for the project. As such, coastal California gnatcatcher is considered absent from the project site and survey results are considered valid for up to 2 years. Therefore, project-related impacts to this species are unlikely to occur. However, due to the continued presence of suitable habitat for this species, the potential for this species to move onto the site cannot be completely ruled out. Therefore, if construction activities commence in the breeding season of February 15 through ~~July 15~~August 30, 2027, or later, the continued presence/absence of the species will need to be confirmed prior to start of construction. Potential project-related impacts to this species would be considered significant if found on the project site.

Pp. 39–40

Species of Special Concern

Three special-status birds were observed on the project site: one CDFW Watch List species (Cooper's hawk) and two CDFW SSCs (yellow-breasted chat and yellow warbler). For these three species, as well as the remaining special-status species (SSC or Watch List species) with a moderate or high potential to occur on the project site (and that are not federally or state listed as endangered or threatened), potential project-related impacts may occur during the general avian breeding season. Potential project-related impacts may also occur if these SSC or Watch List species are found on the project site prior to construction. Any aquatic-dependent special-status species with a potential to occur on the project site within Aliso Creek would not be directly impacted, because the project would avoid impacts to aquatic habitat. The project would occur partially within ~~(0.04 acres)~~ and immediately adjacent to riparian and native habitats that could provide suitable habitat for special-status avian, reptile, and mammal species that could nest, find shelter, or forage within the native habitats on site. Therefore, species such as Southern California legless lizard (*Anniella stebbinsi*), ~~and pallid bat (*Antrozous pallidus*), and southwestern pond turtle (*Actinemys marmorata*)~~ (among others) may be directly or indirectly impacted if present on site during construction if project activities commence within or adjacent to native habitat areas during the general avian nesting season (February through August) or the bat maternity roosting season (March through August). These impacts may be considered significant if the impact results in the greater population of the species dropping below self-sustaining levels. Due to the limited amount of suitable native habitat impacted permanently lost as result of the project (0.054 acres), the greater population of the SSC and Watch List species present on the project site or determined to have a moderate to high potential to occur would not be substantially affected by project-related habitat loss implementation. ~~Regardless, implementation of MM-BIO-4 (Special-Status Wildlife Species Avoidance) and MM-BIO-5 (Worker Environmental Awareness Program [WEAP] Training) will reduce potential impacts~~ resulting from the loss of or harm to individuals to a less than significant level.

Pp. 41–42

Table 3.4-2. Impacts to Vegetation Communities and Land Covers (Acres)

Vegetation Community or Land Cover	Alliance	Association	Project Site	Permanent Project Impacts	Temporary Project Impacts	Total Impacts
Natural Vegetation Communities						
Chamise chaparral	<i>Adenostoma fasciculatum</i> shrubland alliance	<i>Adenostoma fasciculatum</i> association	0.0	0.0	0.0	0.0
Arroyo willow thickets ^a	<i>Salix lasiolepis</i> shrubland alliance	<i>Salix lasiolepis</i> association	0.0	0.0	0.0	0.0
		<i>Salix lasiolepis</i> – <i>Baccharis salicifolia</i> association	0.0	0.0	0.0	0.0
California sagebrush–(purple sage) scrub	<i>Artemisia californica</i> –(<i>Salvia leucophylla</i>) shrubland alliance	<i>Artemisia californica</i> association	0.0	0.00	0.0	0.0
		N/A	0.0	0.0	0.0	0.0
Coyote brush scrub	<i>Baccharis pilularis</i> shrubland alliance	<i>Baccharis pilularis</i> – <i>Artemisia californica</i> association	0.18	0.05	0.13	0.18
California brittle bush–ashy buckwheat scrub	<i>Encelia californica</i> – <i>Eriogonum cinereum</i> shrubland alliance	<i>Encelia californica</i> – <i>Artemisia californica</i> – <i>Salvia mellifera</i> – <i>Baccharis pilularis</i> association	0.16	0.0	0.16	0.16
Lemonade berry scrub	<i>Rhus integrifolia</i> shrubland alliance	N/A	0.0	0.0	0.0	0.0
Sandbar willow thickets	<i>Salix exigua</i> shrubland alliance	<i>Salix exigua</i> association	0.0	0.0	0.0	0.0
Natural vegetation communities subtotal			0.34	0.05	0.29	0.34
Non-Native Vegetation Communities						
Common and giant reed marshes	<i>Phragmites australis</i> – <i>Arundo donax</i> herbaceous semi-natural alliance	<i>Arundo donax</i> association	0.19	0.19	0.0	0.19
		N/A	0.0	0.0	0.0	0.0

Table 3.4-2. Impacts to Vegetation Communities and Land Covers (Acres)

Vegetation Community or Land Cover	Alliance	Association	Project Site	Permanent Project Impacts	Temporary Project Impacts	Total Impacts
Wild oats and annual brome grasslands	<i>Avena</i> spp. – <i>Bromus</i> spp. herbaceous semi-natural alliance	<i>Bromus diandrus</i> association	0.07	<0.01	0.07	0.07
Eucalyptus–tree of heaven–black locust groves	<i>Eucalyptus</i> spp. – <i>Ailanthus altissima</i> – <i>Robinia pseudoacacia</i> woodland semi-natural alliance	<i>Eucalyptus (globulus, camaldulensis)</i> association	0.01	0.0	0.01	0.01
<i>Non-native vegetation communities subtotal</i>			0.27	<0.1	0.27	0.27
Land Cover Types						
Intermittent stream/creek	N/A	N/A	0.0	0.0	0.0	0.0
Unvegetated wash and river bottom	N/A	N/A	0.0	0.0	0.0	0.0
Disturbed habitat	N/A	N/A	0.56	0.02	0.54	0.56
Ornamental plantings	N/A	N/A	0.85	0.0	0.85	0.85
Urban/developed	N/A	N/A	0.99	0.0	0.99	0.99
<i>Land covers subtotal</i>			2.40	0.02	2.38	2.40
Total^b			3.02	0.07	2.95	3.02

Notes: N/A = not applicable.

^a Sensitive natural community.

^b Totals may not sum precisely due to rounding.

As currently designed, the proposed project would result in a total of approximately 3.02 acres of impacts to native and non-native vegetation communities and land cover types, consisting of approximately 2.95 acres of temporary impacts, and approximately 0.07 acres of permanent impacts. Permanent impacts to non-native vegetation communities and land cover types (beyond aquatic land covers) are not considered significant and do not require mitigation. Project-related impacts to native vegetation communities consist of approximately 0.05 acres of permanent impacts and approximately 0.29 acres of temporary impacts. Temporary impacts to vegetation communities will be addressed through preparation and implementation of a revegetation plan and appropriate revegetation of the impacted areas.

The approximately 0.05 acres of permanent impacts to native vegetation communities would consist of impacts to coyote brush–California sagebrush scrub. This upland native vegetation community is not considered sensitive by CDFW, nor is it regionally or locally protected unless it provides occupied habitat for listed species. Focused surveys for listed species such as coastal California gnatcatcher and least Bell's vireo determined that these species were absent from the site; therefore, this vegetation community is not considered sensitive, and project-related permanent impacts are not considered significant and do not require mitigation. Additionally, temporary impacts to

approximately 0.29 acres of coyote brush scrub and California brittlebush–California sagebrush–black sage–coyote brush scrub are not considered significant and do not require mitigation; however, these areas would be revegetated post construction. No project impacts to riparian or sensitive vegetation communities would occur. As such, the project would result in a less than significant impact to sensitive and riparian vegetation communities.

Pp. 45–46

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

Less Than Significant Impact. The project site is within the boundaries of the Orange County Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP), specifically within the Central and Coastal (Central-Coastal) Subregion (Central-Coastal). A portion of the project alignment is located within the Nature Reserve (Reserve) of Orange County (formerly called NROC), a reserve system established by the Central-Coastal Subregion NCCP/HCP. Therefore, the project is required to demonstrate consistency with the goals and objectives of the NCCP/HCP as it pertains to biological resources. The focus of the Central-Coastal Subregion NCCP/HCP reserve system is to protect designated “target species”—coastal California gnatcatcher, coastal cactus wren (*Campylorhynchus brunneicapillus*), and orange-throated whiptail (*Aspidoscelis hyperythra*)—while also providing regulatory coverage of 37 species (9 plant and 28 animal species), conditional coverage of 7 animal species, and coverage of oak woodlands, Tecate cypress forest, cliff and rock, and chaparral (Coastal Subarea only) habitats. Within the reserve system, take of coastal sage scrub habitat and the federally listed as threatened coastal California gnatcatcher are allowed only in relation to specified planned activities (i.e., allowable uses) specified in the Central-Coastal Subregion NCCP/HCP and Implementation Agreement.

Construction of the proposed project would result in approximately 0.018 0.05 acres of permanent impacts and approximately 0.43 acres of temporary impacts to coastal sage scrub covered by the Central/Coastal Subregion of the OC NCCP/HCP which provide suitable habitat for OC NCCP/HCP covered species in the Reserve. No impacts to riparian habitat capable of supporting the conditionally covered least Bell’s vireo will occur from project implementation. Permanent impacts would be limited to areas of non-native vegetation mapped as *Bromus diandrus* association (see Figure 3.4-1a). Temporary impacts in the Reserve would occur to 0.18 acres of native habitat, mapped as coyote brush scrub, as well as 0.07 acres of *Bromus diandrus* association and 0.22 acres of disturbed habitat.

Because the City is not signatory to the Central/Coastal Subregion NCCP/HCP, the project is not an allowed use and is not provided take coverage under the Central-Coastal Subregion NCCP/HCP for covered species or habitats that may be impacted by the project, and instead a Minor Amendment to the NCCP/HCP would be processed by OC Parks, a signatory to the NCCP/HCP, on behalf of the City. As described previously, coastal California gnatcatcher and least Bell’s vireo are considered absent from the project site, and the project is not expected to result in take of any state or federally listed species. However, should the site (or adjacent areas that may be indirectly impacted by the project) become occupied prior to the start of construction, any necessary take authorization would be obtained either through a) the County of Orange or b) the federal Section 10 and state 2080.1 consistency determination or 2081 incidental take permit processes, as is described in MM-BIO-2.

The project, as currently designed, would be in compliance with the biological goals and policies set forth in the OC Central/Coastal Subarea NCCP/HCP, particularly with implementation of the mitigation measures prescribed above. Therefore, the construction of the proposed project would result in less than significant impacts with regard to any adopted or approved conservation plan.

~~Because the City of Laguna Beach is in an enrollment agreement with the Orange County Central Coastal NCCP/HCP, it is required to evaluate the potential impacts of the proposed project to NCCP/HCP covered species and resources. Take authorization of covered species is granted for this project through the City's enrollment agreement to the Orange County Central Coastal NCCP/HCP, and any impacts to covered sensitive natural communities would be covered, if consistent with allowed uses within the Open Space Reserve. Impacts to covered species and associated habitats would be covered under the terms of the USFWS Section 10(a)(1)(B) permit and CDFW Management Authorization granted to the local government with jurisdiction over the proposed activity for Participating Landowners. Impacts to species or sensitive communities not covered under the Orange County Central Coastal NCCP/HCP would be considered significant and would require additional approvals pursuant to the federal Endangered Species Act, California Endangered Species Act, and Natural Community Conservation Planning Act.~~

The project site provides suitable habitat for several Orange County Central-Coastal Subregion NCCP/HCP covered species including coyote, red-shouldered hawk (*Buteo lineatus*), prairie falcon (*Falco mexicanus*), least Bell's vireo, coastal California gnatcatcher, and Coulter's matilija poppy (*Romneya coulteri*). Although these species could occur on site, none of the species were observed during general and focused biological surveys. Additionally, specific covered habitats within the project site include chaparral, riparian, and coastal sage scrub vegetation communities (California sagebrush, coyote brush scrub). Project-Permanent impacts to coastal sage scrub vegetation communities on reserve lands would be minimal, totaling 0.05 acres, and limited to areas adjacent to previous disturbance. There would be no project impacts to riparian or chaparral vegetation communities ~~on site~~. Although the project would result in permanent impacts to covered scrub habitat within the Orange County Central-Coastal Subregion NCCP/HCP rReserve system, these impacts are small in size (approximately 0.05 acres), ~~do are not provide habitat for~~ occupied by listed species, and occur adjacent to existing disturbed areas; ~~therefore, they are not expected to adversely affect the habitat functions of the Reserve.~~

~~Construction of the proposed project would result in approximately 0.05 acres of direct impacts to coastal sage scrub communities covered by the Orange County Central Coastal NCCP/HCP that provide suitable habitat for NCCP/HCP covered species, specifically coastal California gnatcatcher. Coastal California gnatcatcher, least Bell's vireo, and southwestern willow flycatcher (also an NCCP/HCP covered species) were not observed on site during focused surveys; therefore, these covered species are considered absent from the project site and no direct or indirect impacts would occur. In addition, should the area become occupied in the future, MM-BIO-2 would require compensatory mitigation, as determined through consultation and permitting with USFWS and/or CDFW, if listed species are determined to be present on site during future protocol surveys. Therefore~~For these reasons, the proposed project would minimize impacts to covered species and covered habitat to the greatest extent possible and would be consistent with the goals and objectives of the Central-Coastal Subregion NCCP/HCP. Therefore, the construction of the proposed project would result in less than significant impacts with regard to conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. ~~No other NCCP/HCP covered biological resources would be directly impacted by the project and because the City is in an enrollment agreement with the Orange County Central Coastal NCCP/HCP, the proposed project would have a less than significant impact on Habitat Conservation Plans.~~

Pp. 46–48 Mitigation Measures

MM-BIO-2 Coastal California Gnatcatcher and Least Bell's Vireo Avoidance. If project activities are delayed ~~until the combined breeding season for these species~~ past two years from the 2024 protocol surveys (from February 15 through July 31, 2027), additional focused surveys for coastal California gnatcatcher shall be conducted by a permitted biologist and focused surveys for least

~~Bell's vireo shall be conducted by a qualified biologist within the appropriate breeding seasons to determine the presence/absence of either species prior to the start of construction (February 15 through August 30 for coastal California gnatcatcher; April 10 through July 31 for least Bell's vireo). Because the project site occurs within the Orange County Central and Coastal Region Natural Community Conservation Plan/Habitat Conservation Plan and the City is in an enrollment agreement to this plan, potential project related take of either species would be authorized, with conditions for least Bell's vireo as a conditionally covered species, such as clearing outside of the nesting season and minimizing excessive noise during the nesting season.~~

If coastal California gnatcatcher is determined to be absent, it is assumed that the project will not need to obtain take authorization from U.S. Fish and Wildlife Service (USFWS) for the species. However, if coastal California gnatcatcher is present and impacts to occupied habitat cannot be avoided, the City of Laguna Beach shall obtain take authorization under Section 10 of the federal Endangered Species Act. Upon project implementation, the City shall adhere to any measures and conditions that USFWS requires in the take authorization. The City of Laguna Beach shall provide compensatory mitigation for the loss of occupied gnatcatcher habitat as determined through the consultation and permitting processes with USFWS.

If least Bell's vireo is determined to be absent, it is assumed that the project will not need to obtain take authorization from California Department of Fish and Wildlife (CDFW) and/or USFWS. If the species is determined to be present and impacts to occupied habitat cannot be avoided, the City of Laguna Beach shall obtain take authorization under Section 10 of the federal Endangered Species Act and from the state through a California Fish and Game Code Section 2080.1 consistency determination or Section 2081 Incidental Take Permit from CDFW. Upon project implementation, the City shall adhere to any additional measures and conditions that USFWS and/or CDFW may require in the applicable take authorizations. The City of Laguna Beach shall provide compensatory mitigation the loss of occupied vireo habitat as determined through the consultation and permitting processes with USFWS and CDFW.

MM-BIO-4 Special-Status Wildlife Species Avoidance. To avoid and minimize impacts to special-status species, including California Department of Fish and Wildlife Species of Special Concern a qualified biologist shall be present on site to monitor all construction activities.

Biological monitoring shall include the following tasks and responsibilities:

- A qualified biological monitor, as determined by the City of Laguna Beach, shall be on site daily during project activities to conduct compliance inspections to prevent unauthorized take of the following species: western spadefoot, Southern California legless lizard, California glossy snake, orange-throated whiptail, San Diegan tiger whiptail, red diamondback rattlesnake, Blainville's horned lizard, Coronado skink, coast patch-nosed snake, two-striped gartersnake, southwestern pond turtle, Cooper's hawk, southern California rufous-crowned sparrow, long-eared owl, white-tailed kite, yellow-breasted chat, osprey, coastal California gnatcatcher, yellow warbler, least Bell's vireo, pallid bat, western mastiff bat, San Diego desert woodrat, big free-tailed bat, western red bat, and Crotch's bumble bee.
- Enforce biological mitigation measures, permit conditions, and protective measures associated with project approvals.

- Ensure that project activities are only occurring within the direct impact footprint.
- Conduct southwestern pond turtle pre-construction surveys. Starting in mid-March of the year prior to scheduled construction, a qualified turtle biologist, specializing in pond turtle “nesting” behavior, shall conduct a focused visual survey for southwestern pond turtle of the entire project footprint and 500-foot buffer in order to assess the areas for possible nesting sites and to map the limits of those potential habitats.
- Install southwestern pond turtle exclusionary fencing as a barrier between Aliso Creek and construction areas before nesting season. Potential nesting areas shall be excluded with fencing material that is regularly monitored for integrity (i.e., no damage, breeches or gaps). The fence shall be placed prior to the nesting season that precedes the start of construction (i.e., before March 1), even if the pipeline construction does not begin until summer or fall. The fencing material shall be at least 24 inches tall, with 6 inches keyed into the soil (buried) and 18 inches above ground.
 - The monitor shall periodically survey the modification zone and exclusion fence to make sure that there are no openings and that no turtles have entered the study area. If a turtle is observed, it shall be captured, processed, its reproductive status determined (palpating for eggs), and either relocated back to Aliso Creek out of harm’s way or redirected to an area that is unencumbered by silt fencing. The monitor palpating shall ensure that female turtles attempting to return to same area to nest later that day or over the next few days are relocated out of the construction area.
 - Exclusionary fencing shall be installed through one of two alternative methods:
 - Exclude the entire Aliso Creek riparian zone from the pipeline modification study area. This shall consist of a single line of exclusion fencing (i.e., several segments of silt fence attached to one another), uninterrupted from the upstream portion of the study area to the downstream portion and deflected back from the creek a sufficient distance to prevent end-runs. This shall prevent turtles from moving into the project zone. The fence shall be maintained with no breaks and/or openings throughout the project duration.
 - OR-
 - Exclude only those areas deemed by the turtle biologist as possible nesting areas within 500 feet of the creek (e.g., dry soil with sparse vegetation and southern exposure, including soil berms or stockpiles created during construction). This shall include completely surrounding those areas with an exclusion fence. The size of the exclusion areas shall depend on available nesting habitat (could be small and/or large, and could be many). The exclusion fence(s) shall be maintained at all times with no breaks and installed as directed above.
- Conduct pre-construction sweeps in areas with suitable habitat to support special-status wildlife. Supervise and conduct regular spot checks during vegetation clearing, grubbing, and grading. If permits are not necessary to handle or harass the species, flush or move wildlife from work areas ahead of ground disturbance activities during pre-construction sweeps.
- Monitor construction activities, move wildlife out of harm’s way, halt construction activities, and coordinate with wildlife agencies for relocation, if needed. If slow-moving and/or fossorial special-status species that do not easily flush are detected in the work area, a biologist possessing an appropriate California scientific collecting permit to handle special-status

species will capture and relocate individuals to nearby undisturbed areas with suitable habitat outside of the construction area, but as close to their origin as possible. All wildlife moved during project activities shall be documented by the biologist on site.

- Inspect all open holes and trenches daily and just prior to back-filling or covering. At the end of each workday, the contractor shall cover all trenches to prevent entrapment of wildlife. If any worker discovers that special-status wildlife has become trapped, they shall notify the construction supervisor and biological monitor immediately for extraction. Project workers and the biologist shall allow the individual to escape unimpeded if possible, or an appropriately permitted biologist may move the individual out of harm's way before allowing work to continue.
- Periodically monitor the construction site to see that dust is minimized. If the biological monitor determines that dust is adversely affecting special-status species, the monitor shall require the construction personnel to implement best available control measures to reduce dust. Examples of such best available control measures include periodic watering of work areas, application of environmentally safe soil stabilization materials, and/or roll compaction.

~~Construction activities shall avoid the combined general bird nesting season and bat maternity roosting season (February through August) to reduce and minimize potential impacts to state listed and federally listed special status species. In the event the nesting and maternity season cannot be avoided, a pre construction survey shall be conducted within 10 days prior to the start of project activities to determine the presence/absence of any special status wildlife species within and immediately adjacent to the project site. If any special status wildlife species are found during the survey, additional avoidance and minimization measures shall be required. Specifically, a qualified biological monitor, as determined by the City of Laguna Beach, shall be on site during construction activities to ensure that no impacts to special status wildlife occur, either by moving wildlife out of harm's way, halting construction activities, or coordinating with the wildlife agencies for relocation, if needed. Any relocation activities would occur outside the nesting or maternity roosting season to reduce impacts to special status wildlife.~~

Figures, pp. 159–163

Changes have also been made to Figures 3.4-1a through Figures 3.4-1c (see below).

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4 Mitigation Monitoring and Reporting Program

CEQA requires that a public agency adopting a Mitigated Negative Declaration (MND) take affirmative steps to determine that approved mitigation measures are implemented after project approval. The lead or responsible agency must adopt a reporting and monitoring program for the mitigation measures incorporated into a project or included as conditions of approval. The program must be designed to ensure compliance with the MND during project implementation (California Public Resources Code, Section 21081.6[a][1]).

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the City to ensure compliance with adopted mitigation measures identified in the IS/MND for the proposed project when construction begins. The City, as the lead agency, will be responsible for ensuring that all mitigation measures are carried out. Implementation of the mitigation measures would reduce impacts to below a level of significance for aesthetics, biological resources, cultural resources, geology and soils, hydrology and water quality, noise, transportation, tribal cultural resources, utilities and service systems, and wildfire.

The remainder of this MMRP consists of a table that identifies the mitigation measures by resource for each project component. Table 2 identifies the mitigation monitoring and reporting requirements, list of mitigation measures, party responsible for implementing mitigation measures, timing for implementation of mitigation measures, agency responsible for monitoring of implementation, and date of completion. With the MND and related documents, this MMRP will be kept on file at the following location:

City of Laguna Beach
Public Works Department
505 Forest Avenue
Laguna Beach, California 92651

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
Aesthetics				
MM-AES-1 Nighttime Construction. All mobile/temporary sources of lighting used during nighttime construction shall be hooded, fully shielded, and aimed downward to minimize the potential for light trespass onto surrounding properties, occurrences of skyglow, and excessive glare received on surrounding properties.	During Construction	City of Laguna Beach	City of Laguna Beach	
Biological Resources				
MM-BIO-1: Special Status Plant Surveys. Prior to the start of project activities, a qualified botanist shall conduct a survey to map and flag the location of any Nuttall's scrub oaks, to verify previously identified locations and map any additional locations, if any. The mapped locations will be flagged for avoidance during construction, to the extent feasible. If project activities require trimming or removal of any scrub oaks, a biological monitor must be on site during construction to ensure that scrub oak trimming, removal, and/or construction over scrub oak root systems do not result in mortality of more than five scrub oaks. The loss of up to five scrub oak individuals would be less than significant, given that this would represent a de minimis portion (estimated at less than 1%) of the overall population. In the event construction is expected to result in removal/mortality of more than five individual scrub oaks, a Restoration Plan shall be prepared to salvage and relocate the Nuttall's scrub oaks to be impacted to the extent feasible. The Restoration Plan will describe the methods of salvage (if feasible) and proposed location for relocation and/or restoration with appropriate local nursery (genetic stock from Southern California) that will be conserved in perpetuity. The Restoration Plan will include success criteria that ensure that a minimum 2:1 ratio (restored to impacted)	Prior to construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
of scrub oak individuals be established and healthy without supplemental irrigation for at least 2 years.				
MM-BIO-2 Coastal California Gnatcatcher and Least Bell's Vireo Avoidance. If project activities are delayed past two years from the 2024 protocol surveys, additional focused surveys for coastal California gnatcatcher shall be conducted by a permitted biologist and focused surveys for least Bell's vireo shall be conducted by a qualified biologist within the appropriate breeding seasons to determine the presence/absence of either species prior to the start of construction (February 15 through August 30 for coastal California gnatcatcher; April 10 through July 31 for least Bell's vireo). If coastal California gnatcatcher is determined to be absent, it is assumed that the project will not need to obtain take authorization from U.S. Fish and Wildlife Service (USFWS) for the species. However, if coastal California gnatcatcher is determined to be nesting and impacts to suitable habitat cannot be avoided, the City of Laguna Beach shall obtain take authorization federally with USFWS through Section 10 permitting. Upon project implementation, the City shall adhere to any additional measures and conditions that USFWS may require in the applicable take authorization. No take of coastal California gnatcatcher shall occur without authorization from USFWS pursuant to the federal Endangered Species Act. The City of Laguna Beach shall provide compensatory mitigation as determined through the consultation and permitting processes with USFWS. If least Bell's vireo is determined to be absent, it is assumed that the project will not need to obtain take authorization from California Department of Fish and Wildlife (CDFW) and/or USFWS. If the species is determined to be nesting and impacts to suitable habitat cannot be avoided, the City	Prior to construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
of Laguna Beach shall obtain take authorization federally with USFWS through Section 10 permitting and with the state through a California Fish and Game Code Section 2080.1 consistency determination or Section 2081 Incidental Take Permit from CDFW. Upon project implementation, the City shall adhere to any additional measures and conditions that USFWS and/or CDFW may require in the applicable take authorizations. No take of least Bell's vireo shall occur without authorization from USFWS and CDFW pursuant to the federal Endangered Species Act and California Endangered Species Act. The City of Laguna Beach shall provide compensatory mitigation as determined through the consultation and permitting processes with USFWS and CDFW.				
MM-BIO-3 Crotch's Bumble Bee Surveys. Nesting surveys shall occur if ground-disturbing activities are scheduled to occur during the queen flight season through the colony active period (February 1 through August 31). Potential nesting sites should be surveyed for active Crotch's bumble bee colonies either through observations of queens searching for nesting sites or by looking for concentrated Crotch's bumble bee activity entering and exiting a given area. Surveys may occur between 1 hour after sunrise and 2 hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, raining, or drizzling) and surveyors shall wait at least 1 hour following rain. Optimal surveys are conducted when there are sunny to partly sunny skies and temperatures between 65°F and 90°F, and winds less than 8 mph. Surveys may be conducted outside these weather parameters if other bees or butterflies are observed flying. Potential nesting sites investigated by colony founding queens should be GPS marked if the queen exhibits signs of	Prior to construction during nesting season	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
interest in the potential site (e.g., she does not emerge from the site within a few minutes and then continue to nest search). Potential nesting sites identified during the queen nest searching phase shall be evaluated later during the colony active period to determine whether an active colony has been established, Potential nest sites on the project site will be observed for up to 5 minutes during the colony active period to monitor for Crotch's bumble bees entering or exiting. If a nest site is confirmed to be occupied by Crotch's bumble bees, the location's GPS coordinates shall be recorded; however, no flagging or visual marking of the nest location will occur until just prior to and during construction. If Crotch's bumble bee is not detected during the pre-construction surveys, no further action or mitigation is required. If Crotch's bumble bee is detected, the City, in consultation with a qualified entomologist, will develop a Crotch's Bumble Bee Avoidance Plan to fully avoid direct and indirect impacts to this species. The avoidance plan will include nesting surveys, adaptive management, and success criteria. If take cannot be avoided, then an Incidental Take Permit from the California Department of Fish and Wildlife (CDFW) and subsequent mitigation would be required to reduce the impact to a less than significant level. If required, mitigation for direct impacts to Crotch's bumble bee shall be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project. Mitigation shall be accomplished either through off-site conservation or through a CDFW-approved mitigation bank. If mitigation is not purchased through a mitigation bank, and lands are conserved separately, a cost estimate shall be prepared to estimate the initial startup costs and ongoing annual costs of management activities for the management				

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
of the conservation easement area(s) in perpetuity. The funding source shall be in the form of an endowment to help the qualified natural lands management entity that is ultimately selected to hold the conservation easement(s). The endowment amount shall be established following the completion of a project-specific Property Analysis Record to calculate the costs of in-perpetuity land management. The Property Analysis Record shall take into account all management activities to fulfill the requirements of the conservation easement(s), which are currently in review and development.				
MM-BIO-4 Special-Status Wildlife Species Avoidance. To avoid and minimize impacts to special status species, including California Department of Fish and Wildlife Species of Special Concern, a qualified biologist shall be present on site to monitor all construction activities. Biological monitoring shall include the following tasks and responsibilities: A qualified biological monitor, as determined by the City of Laguna Beach, with turtle experience shall be on site daily during project activities to conduct compliance inspections to prevent unauthorized take of the following species: San Diegan tiger whiptail, red diamondback rattlesnake, Blainville's horned lizard, Coronado skink, coast patch-nosed snake, two-striped gartersnake, southwestern pond turtle, Cooper's hawk, southern California rufous-crowned sparrow, long-eared owl, white-tailed kite, yellow-breasted chat, osprey, coastal California gnatcatcher, bank swallow, yellow warbler, least Bell's vireo, pallid bat, western mastiff bat, San Diego desert woodrat, big free-tailed bat, western red bat, and Crotch's bumble bee.	During construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
▪ Enforce biological mitigation measures, permit conditions, and protective measures associated with project approvals. ▪ Ensure that project activities are only occurring within the direct impact footprint. ▪ Conduct southwestern pond turtle pre-construction surveys. Starting in mid-March of the year prior to scheduled construction, a qualified turtle biologist, specializing in pond turtle “nesting” behavior, shall conduct a focused visual survey for southwestern pond turtle of the entire project footprint and 500-foot buffer in order to assess the areas for possible nesting sites and to map the limits of those potential habitats. ▪ Install southwestern pond turtle exclusionary fencing as a barrier between Aliso Creek and construction areas before nesting season. Potential nesting areas shall be excluded with fencing material that is regularly monitored for integrity (i.e., no damage, breeches or gaps). The fence shall be placed before the nesting season begins (i.e., before March 1), even if the pipeline construction does not begin until summer and/or fall. The fencing material shall be at least 24 inches tall, with 6 inches keyed into the soil (buried) and 18 inches aboveground. - The monitor shall periodically survey the modification zone and exclusion fence to make sure that there are no openings and that no turtles have entered the study area. If a turtle is observed, it shall be captured, processed, its reproductive status determined (palpating for eggs), and either relocated back to Aliso Creek out of harm’s way or redirected to an area that is unencumbered by silt fencing. The monitor palpating shall ensure that female turtles attempting				

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
to return to same area to nest later that day or over the next few days are relocated out of the construction area. - Exclusionary fencing shall be installed through one of two alternative methods: - Exclude the entire Aliso Creek riparian zone from the pipeline modification study area. This shall consist of a single line of exclusion fencing (i.e., several segments of silt fence attached to one another), uninterrupted from the upstream portion of the study area to the downstream portion and deflected back from the creek a sufficient distance to prevent end-runs. This shall prevent turtles from moving into the project zone. The fence shall be maintained with no breaks and/or openings throughout the project duration. -OR- - Exclude only those areas deemed by the turtle biologist as possible nesting areas within 500 feet of the creek (e.g., dry soil with sparse vegetation and southern exposure, including soil berms or stockpiles created during construction). This shall include completely surrounding those areas with an exclusion fence. The size of the exclusion areas shall depend on available nesting habitat (could be small and/or large, and could be many). The exclusion fence(s) shall be maintained at all times with no breaks and installed as directed above. ▪ Conduct pre-construction sweeps in areas with suitable habitat to support special-status wildlife. Supervise and conduct regular spot checks during vegetation clearing, grubbing, and grading. If permits are not necessary to				

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
handle or harass the species, flush or move wildlife from work areas ahead of ground disturbance activities during pre-construction sweeps. ▪ Monitor construction activities, move wildlife out of harm's way, halt construction activities, and coordinate with wildlife agencies for relocation, if needed. If slow-moving and/or fossorial special-status species that do not easily flush are detected in the work area, a biologist possessing an appropriate California scientific collecting permit to handle special-status species will capture and relocate individuals to nearby undisturbed areas with suitable habitat outside of the construction area but as close to their origin as possible. All wildlife moved during project activities shall be documented by the biologist on site. ▪ Inspect all open holes and trenches daily and just prior to back-filling or covering. At the end of each workday, the contractor shall cover all trenches to prevent entrapment of wildlife. If any worker discovers that special-status wildlife has become trapped, they shall notify the construction supervisor and biological monitor immediately for extraction. Project workers and the biologist shall allow the individual to escape unimpeded if possible, or an appropriately permitted biologist may move the individual out of harm's way before allowing work to continue. ▪ Periodically monitor the construction site to see that dust is minimized. If the biological monitor determines that dust is adversely affecting special-status species, the monitor shall require the construction personnel to implement best available control measures to reduce dust. Examples of such best available control measures include periodic watering of work areas, application of				

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
environmentally safe soil stabilization materials, and/or roll compaction.				
MM-BIO-5 Worker Environmental Awareness Program (WEAP) Training. Prior to the start of project activities, a pre-construction meeting shall be required that includes a training session for project personnel by a biological monitor. The training shall include (1) a description of the species of concern and their habitats; (2) the general provisions of the applicable regulations pertaining to biological resources, including the Endangered Species Act and the Clean Water Act; (3) the need to adhere to the provisions of the Endangered Species Act, the Clean Water Act, and other applicable regulations; (4) the penalties associated with violating the provisions of the Endangered Species Act, Clean Water Act, and other applicable regulations; (5) the general measures that are being implemented to conserve the species of concern as they relate to the project; and (6) the access routes to and from disturbance area boundaries within which the project activities must be accomplished. Additionally, the training shall include the measures and mitigation requirements for the applicable resources. Copies of the mitigation measures and any required permits from the resource agencies shall be made available to construction personnel. The training shall be provided in alternate languages, as needed. If any special-status species are observed, the biological monitor or on-site construction manager will be immediately notified to determine the appropriate avoidance and minimization measures for the species during construction activities, including moving the wildlife out of harm's way, halting construction activities, or coordinating with the wildlife agencies for relocation, if needed.	Prior to construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
MM-BIO-6 Nesting Bird Avoidance. To reduce any potential indirect impact to nesting birds, project construction should commence outside of the general avian nesting season (from February through August). If construction activities cannot avoid the nesting season, then a pre-construction survey shall be conducted by a trained biologist to determine the presence/absence of any nesting birds within the project site and 500-foot buffer around the site. If an active nest is found, a suitable buffer based on the species sensitivity and proximity to the area of disturbance shall be placed around the nest for the duration of the nesting period. Construction may continue within this buffer only at the discretion of a monitoring biologist. The buffer can be removed when the nest is no longer active due to natural causes, as determined by a trained biologist.	During construction	City of Laguna Beach	City of Laguna Beach	
MM-BIO-1 Operations and Maintenance. To the extent feasible, operations and maintenance at the valve vault located on Central- Orange County Central and Coastal Natural Communities Conservation Plan/Habitat Conservation Plan Reserve lands shall be conducted outside the breeding season (March 15 through September 1). The City of Laguna Beach shall prepare an operations and maintenance plan, to be submitted to the Reserve owner/manager. The plan shall include, at a minimum, expected patrol and maintenance time intervals; describe, to the extent practicable, routine repair/maintenance activities and location; describe areas and procedures to be used for routine weed abatement and clearing; and include any other anticipated operational activities.	During operations and maintenance at the valve vault	City of Laguna Beach	City of Laguna Beach	
PDF-1 The City shall prepare and implement a revegetation plan to guide revegetation of all temporarily impacted areas. The plan shall include, at a minimum, site preparation plans to de-compact soils, identification of a non-irrigated seed	Prior to construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
mix containing characteristic species that are locally appropriate based on their presence in adjacent reference habitat, requirements for signage and temporary rope-and-post fencing to be installed along the perimeter to deter encroachment during reestablishment, and minimum performance standards to ensure success, including maintenance and monitoring of the site for a minimum of 2 years.				
Cultural Resources				
MM-CUL-1: Workers Environmental Awareness Program. Prior to the initiation of ground-disturbing work, construction crews shall be made aware of the potential to encounter cultural resources and the requirement for cultural monitors to be present during these activities. This may occur as part of a Worker Environmental Awareness Program. Topics addressed will include definitions and characteristics of cultural resources, regulatory requirements and penalties for intentionally disturbing cultural resources, and protocols to be taken in the event of an inadvertent discovery.	Prior to construction	City of Laguna Beach	City of Laguna Beach	
MM-CUL-2: Cultural Resources Monitoring and Inadvertent Discovery Protocols. A monitoring plan shall be prepared by an archaeological principal investigator meeting the Secretary of the Interior's Standards and implemented upon approval by the City. An archaeological monitor shall be present during all initial ground-disturbing activities for the project. Archaeological monitoring may be adjusted (increase, decreased, or discontinued) at the recommendation of the archaeological principal investigator and based on inspection of exposed cultural material and the observed potential for soils to contain intact cultural deposits or otherwise significant archaeological material. The archaeological monitor shall be provided a copy of the project-specific cultural resources inventory report and its	During construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
pertinent appendices (included as Appendix C to the project Initial Study/Mitigated Negative Declaration) to inform their monitoring efforts. The archaeological monitor shall have the authority to temporarily halt work to inspect areas for potential cultural material or deposits. In the event that unanticipated archaeological deposits or features are exposed during construction activities, all construction work occurring within 50 feet of the find shall immediately stop until the archaeological principal investigator is provided access to the project site and can assess the significance of the find and determine whether additional study is warranted. The work exclusion buffer may be adjusted as appropriate to allow work to feasibly continue at the recommendation of the archaeological principal investigator. Should it be required, temporary flagging shall be installed around the resource to avoid any disturbance from construction equipment. The potential for avoidance should be the primary consideration of this initial process. The significance of the find shall be assessed as outlined by the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; California Public Resources Code Section 21082). If the archaeological principal investigator observes the discovery to be potentially significant under CEQA, additional efforts, such as the preparation of an archaeological treatment plan, testing, and/or data recovery, are warranted prior to allowing construction to proceed in this area. Daily monitoring logs shall be completed by the on-site archaeological monitor. Within 60 days following completion of construction, the archaeological principal investigator shall provide an archaeological monitoring report to the City. This report shall include the results of the cultural monitoring program (even if negative), including a summary				

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
of any findings or evaluation/data recovery efforts, and supporting documentation that demonstrates that all mitigation measures defined in the environmental document were appropriately met. Appendices shall include archaeological monitoring logs and documentation relating to any newly identified or updated cultural resources. This report shall be submitted to the South Central Coastal Information Center once considered final.				
MM-CUL-3: Treatment of Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if potential human remains are found, the Orange County Coroner (County Coroner) shall be immediately notified of the discovery. The County Coroner shall provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, shall occur until a determination has been made regarding if the find is human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, NAHC must immediately notify those persons it believes to be the most likely descendant of the deceased Native American. The most likely descendant shall then recommend to the lead agency their preferred treatment of the remains and associated grave goods.	During construction	City of Laguna Beach	City of Laguna Beach	
Geology and Soils				
MM-GEO-1: Ground Settlement Prevention. In accordance with recommendations of the project-specific geotechnical report (included as Appendix D to the project Initial Study/Mitigated Negative Declaration), the project shall be	Prior to construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
designed such that either the access pits are located more than 50 feet away from existing structures, or if that is not feasible, structures/improvements in the vicinity of the planned shoring installation shall be reviewed with regard to foundation support and tolerance to settlement. To reduce the potential for distress to adjacent structures, the shoring system shall be designed to limit the ground settlement behind the shoring system to 0.5 inches or less. Possible causes of settlement that shall be addressed include settlement during installation of the shoring system, excavation for the access pits, construction vibrations, dewatering, and removal of the support system. If access pits will be located within 50 feet of adjacent structures, based on site-specific conditions, a qualified and experienced engineer shall determine whether a ground vibration and monitoring plan shall be implemented prior to construction. Structures are not present along the majority of the proposed pipeline alignment. The locations where ground vibration monitoring at access pits may be appropriate include the existing pump station, near the intersection of Village Lane and the private road for The Ranch at Laguna Beach, and at the South Orange County Wastewater Authority's Coastal Treatment Plant. Based on site-specific conditions, the shoring installation and vibration monitoring plan, if needed, shall be evaluated carefully by the contractor prior to construction. Ground vibration and settlement monitoring shall be performed during construction, as appropriate. The contractor shall retain a qualified and experienced engineer to design the shoring system and make modifications, as appropriate.				
MM-GEO-2: Paleontological Resources Impact Mitigation Program. Prior to commencement of any grading activity on site, the applicant shall retain a qualified paleontologist per	During construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
the Society of Vertebrate Paleontology (SVP) 2010 Guidelines. The paleontologist shall prepare a Paleontological Resources Mitigation Program for the project. The Paleontological Resources Mitigation Program shall be consistent with the SVP 2010 Guidelines and should outline requirements for pre-construction meeting attendance and worker environmental awareness training; where monitoring is required within the project site based on construction plans and/or geotechnical reports; procedures for adequate paleontological monitoring and discoveries treatment; and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the pre-construction meeting and a qualified paleontological monitor shall be on site during all rough grading and other significant ground-disturbing activities (including augering) in previously undisturbed, fine-grained Pleistocene alluvial deposits or older deposits with high paleontological resource sensitivity or potential. In the event that paleontological resources (e.g., fossils) are unearthed during grading or other ground-disturbing activities, the paleontological monitor will temporarily halt and/or divert construction activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot-radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow activities to recommence in the area of the find. Costs for laboratory work and curation at a local museum are the responsibility of the City.				
Hydrology and Water Quality				
MM-HYD-1 Frac-Out Contingency Plan. Prior to construction, a frac-out contingency plan shall be completed and include measures for training, monitoring, worst-case scenario	Prior to construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
evaluation, equipment and materials, agency notification and prevention, containment, cleanup, and disposal of released drilling muds. Preventive pre-construction measures shall include determining the most appropriate horizontal directional drilling (HDD) depth and mud mixture, based on the preliminary geotechnical investigation (included as Appendix D to the project Initial Study/Mitigated Negative Declaration). In addition, drilling pressures shall be closely monitored to avoid drilling pressures exceeding pressures required to penetrate the rock formation. Monitoring by a minimum of two monitors (located both upstream and downstream) shall occur throughout drilling operations to ensure swift response in the event of a frac-out, while containment shall be accomplished through construction of temporary berms/dikes and use of silt fences, straw bales, absorbent pads, straw wattles, and plastic sheeting. Cleanup shall be accomplished with plastic pails, shovels, portable pumps, and vacuum trucks. The frac-out contingency plan shall be submitted to the City of Laguna Beach for review and approval.				
Noise				
MM-NOI-1: Construction Noise Reduction. The following mitigation shall be implemented during construction of the project: - During construction, the construction contractor shall ensure that all internal combustion engines on construction equipment and trucks are fitted with properly maintained mufflers. - During construction activities, the project contractors shall be responsible for requiring the proper maintenance and tuning of all construction equipment to minimize noise emissions.	During construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
▪ Stockpiling and vehicle staging areas shall be located as far away as possible from occupied residences and the resort hotel guest accommodations and shall be screened from these uses by a noise-attenuating barrier. ▪ All stationary construction equipment (e.g., air compressor, generators, impact wrenches) shall be operated as far away from residential uses as possible and, to the extent practical, shall be shielded with temporary sound-attenuating barriers, aprons, shrouds, or comparably performing means that do not impact equipment performance or access. ▪ To the extent feasible, haul routes for removing excavated materials or delivery of aggregate materials from the site shall be designed to avoid residential areas and areas occupied by noise-sensitive receptors (e.g., hospitals, schools, and convalescent homes). ▪ Idling equipment shall be turned off when not in use for periods longer than 5 minutes. ▪ If feasible, the following types of construction equipment shall be used: - Electrical equipment instead of diesel-powered equipment - Hydraulic tools instead of pneumatic tools - Electric welders powered by remote generators ▪ During construction for the Open Trench to HDD Receiving Area segment, which is to occur at night and per City allowance in a letter dated January 3, 2025, a temporary sound-attenuating barrier (e.g., suspended acoustical blanket) having the following characteristics shall be installed: - A minimum sound transmission class (STC) rating of 25				

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
- A minimum height of 10 feet from bottom edge (at grade) to top height - Sufficient total length, comprising adjoining panels or sheets with no airgaps at points of fastening or contact, parallel with and extending a minimum of twice the project alignment segment to be worked on a particular night (e.g., if 60 feet of progress is expected, the barrier shall be 120 feet long, or 60 feet in each direction from the average activity midpoint along the alignment segment) As work on this segment progresses, portions of the temporary barrier or the entire temporary barrier shall be relocated, as needed, to ensure that the direct sound path between this construction activity and the closest off-site noise-sensitive receptor(s) is blocked. To accommodate installation, relocation, and/or removal of these temporary barriers to facilitate this nighttime construction work and not impede daytime resort operations (e.g., usage of Country Club Lane), actual on-site construction activity is not expected to exceed 6 hours per night, which will enable the aggregate 8-hour Leq noise level to comply with the Federal Transit Authority's 70 dBA guidance threshold. ▪ Residences within 300 feet of work sites shall be notified of the construction schedule in writing at least 72 hours prior to construction. The contractor shall designate a noise disturbance point of contact who shall be responsible for responding to complaints regarding construction noise. The point of contact shall determine the cause of the complaint and ensure that reasonable measures are implemented to correct the problem. A contact number for the noise disturbance point of contact shall be conspicuously placed on construction				

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
site fences and written into the construction notification schedule sent to nearby residences. The use of mobile heavy construction equipment with alternative backup beeper alarm systems, which continue to provide the necessary safety warnings but reduce the impacts of these sounds on the surrounding community, shall be considered. Examples of such systems include variable-loudness or ambient-adjusted backup beepers and white-noise reversing alarms.				
Transportation				
MM-TRA-1 Construction Traffic Control Plan. Prior to construction of the project, the contractor shall prepare, and the City Engineer shall approve, a detailed Construction Traffic Control Plan. The Construction Traffic Control Plan shall include, but not be limited to, the following: - Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation - Prohibition of construction worker or equipment parking on adjacent streets - Prohibition of haul truck staging on any streets adjacent to the project, unless specifically approved as a condition of an approved haul route - Containment of construction activity within the project site boundaries - Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers - Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours to the extent feasible	Prior to construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
- Spacing of trucks so as to discourage a convoy effect - Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day - Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction				
Tribal Cultural Resources				
MM-TCR-1 Retention of a Native American Monitor Prior to Ground-Disturbing Activities. The City of Laguna Beach (City) shall retain a Native American monitor from interested consulting tribes (Tribes) prior to the commencement of initial ground-disturbing activities for the project. Ground-disturbing activities shall include, but are not limited to, demolition, pavement removal, potholing, augering, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. The Native American monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities; the type of construction activities performed; locations of ground-disturbing activities; soil types; culturally related materials; and any other facts, conditions, and discovered tribal cultural resources (TCRs), including but not limited to Native American cultural and historical artifacts, remains, places of significance, etc., (collectively referred to as TCRs), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the City upon written request to the Tribes.	Prior to construction	City of Laguna Beach	City of Laguna Beach	
MM-TCR-2 Unanticipated Discovery Protocol for Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). In the event that unanticipated tribal cultural resources (TCRs) are exposed during construction activities, all construction work occurring	During construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
within 50 feet of the find shall immediately stop until the discovery has been fully assessed by the Native American monitor(s) from the consulting tribes (Tribes). The work exclusion buffer may be adjusted as appropriate to allow work to feasibly continue at the recommendation of the Native American monitor(s). Should it be required, temporary flagging shall be installed around the TCR in order to avoid any disturbances from construction equipment. The Tribes will recover and retain all discovered TCRs in the form and/or manner the Tribes deem appropriate, in the Tribes' sole discretion, and for any purpose including for educational, cultural, and/or historic purposes.				
MM-TCR-3 Unanticipated Discovery Protocol for Human Remains and Associated Funerary or Ceremonial Objects. Native American human remains are defined in California Public Resources Code Section 5097.98(d)(1) as an inhumation or cremation, in any state of decomposition or skeletal completeness. Funerary objects, called "associated grave goods" in California Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or associated grave goods are discovered or recognized on the project site, California Public Resources Code Section 5097.9 and California Health and Safety Code Section 7050.5 shall be followed. Human remains and/or associated grave goods shall be treated alike per California Public Resources Code Sections 5097.98(d)(1) and 5097.98(d)(2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or associated grave goods. Any discovery of human remains and/or associated grave goods shall be kept confidential to prevent further disturbance.	During construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
Wildfire				
MM-FIRE-1: Construction Fire Prevention Plan. The City of Laguna Beach shall prepare and implement a Construction Fire Prevention Plan (Plan) to ensure the safety of workers and the public during construction of the proposed project. The applicant must submit the Plan to the Laguna Beach Fire Department for review and approval prior to construction. The Plan shall include, but not be limited to, the following elements: ▪ Procedures shall be provided for minimizing potential ignition, including vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, and hot work restrictions. ▪ Work restrictions shall be provided for implementation during Red Flag Warnings and High to Extreme Fire Danger days. ▪ All internal combustion engines used at the proposed project site shall be equipped with spark arrestors. Spark arrestors shall be in good working order. ▪ Fire rules shall be posted and visible all to employees at the contractor's field office and in other common areas. ▪ Equipment parking areas and small stationary engine sites shall be cleared of all flammable materials. ▪ Smoking shall be prohibited in all vegetated areas and within 50 feet of combustible materials storage and shall be limited to paved areas or areas cleared of all vegetation. ▪ During construction, fire extinguishers and fire-fighting equipment sufficient to extinguish small fires shall be available on site and all construction vehicles shall be equipped with a fire extinguisher.	Prior to construction	City of Laguna Beach	City of Laguna Beach	

Table 5.1-1. Mitigation Monitoring and Reporting Program

Mitigation Measure/Avoidance Minimization Measure/ Project Design Feature	Implementation Timing	Party Responsible For Implementation	Party Responsible For Monitoring	Date of Completion/ Notes
▪ All construction workers visiting the project site shall receive training on fire prevention procedures, the proper use of fire-fighting equipment, and procedures to be followed in the event of a fire. ▪ Fires ignited on site shall be immediately reported to the Laguna Beach Fire Department. ▪ The engineering, procurement, and construction contract(s) for the proposed project shall provide reference to or clearly state the requirements of this mitigation measure.				

5 List of Preparers

City of Laguna Beach

Ulises Escalona, Senior Project Manager
Tom Perez, Assistant Director of Public Works
Pierre Sawaya, Capital Program Manager

Dudek

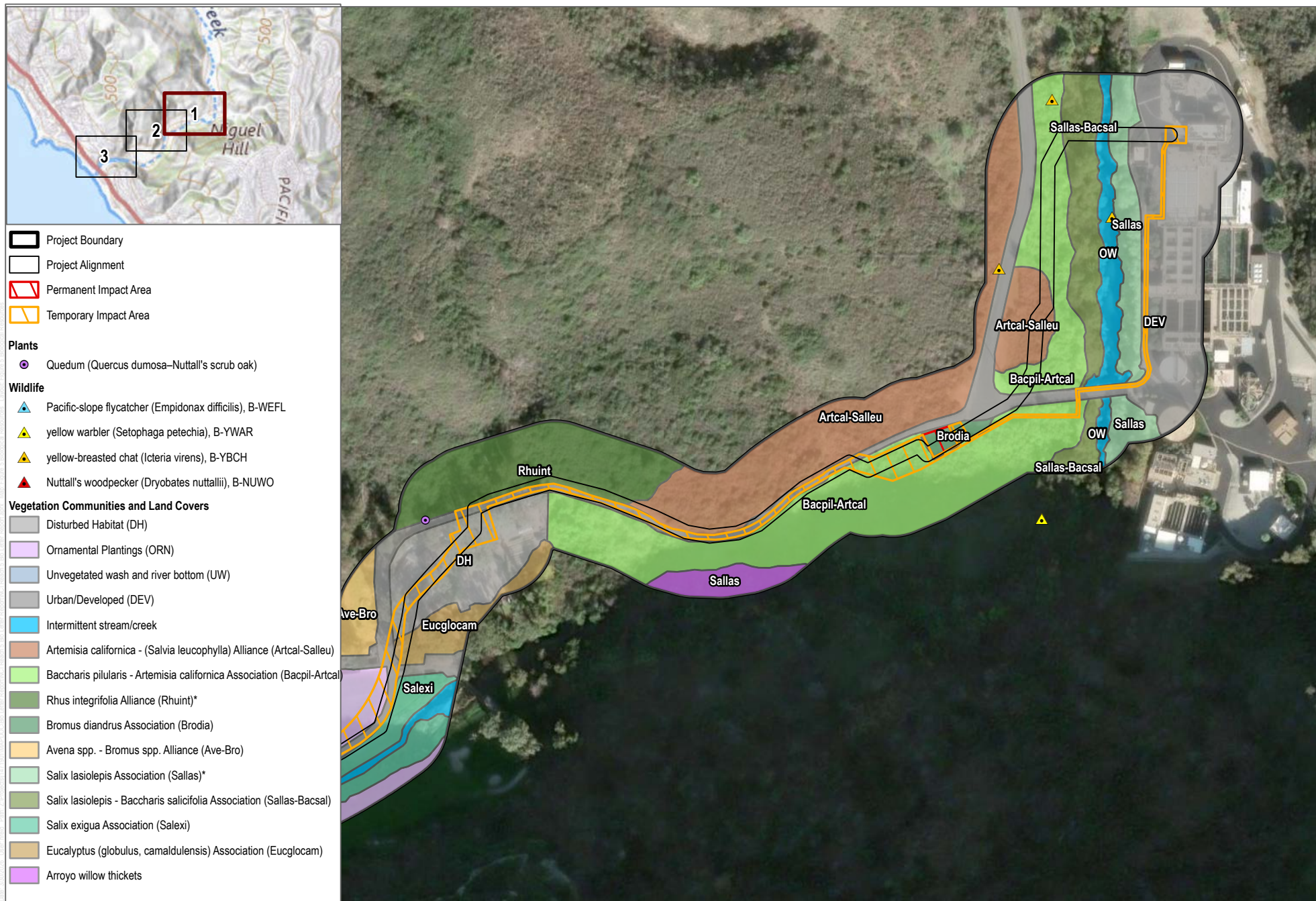
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Laura Masterson, Lead Environmental Analyst
Alexandra Howard, Environmental Analyst
Ames Noll, Air Quality Analyst
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Kimberly Narel, Biologist
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Hannah Wertheimer-Roberts, Senior Technical Editor
Laura Reed, Publications Specialist
Chelsea Ringenback, Publications Specialist

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6 References

Google Earth. 2025. Aerial photographs of the project site. Accessed April 2025. <https://www.google.com/earth/>.

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SOURCE: Esri Imagery Accessed 2024

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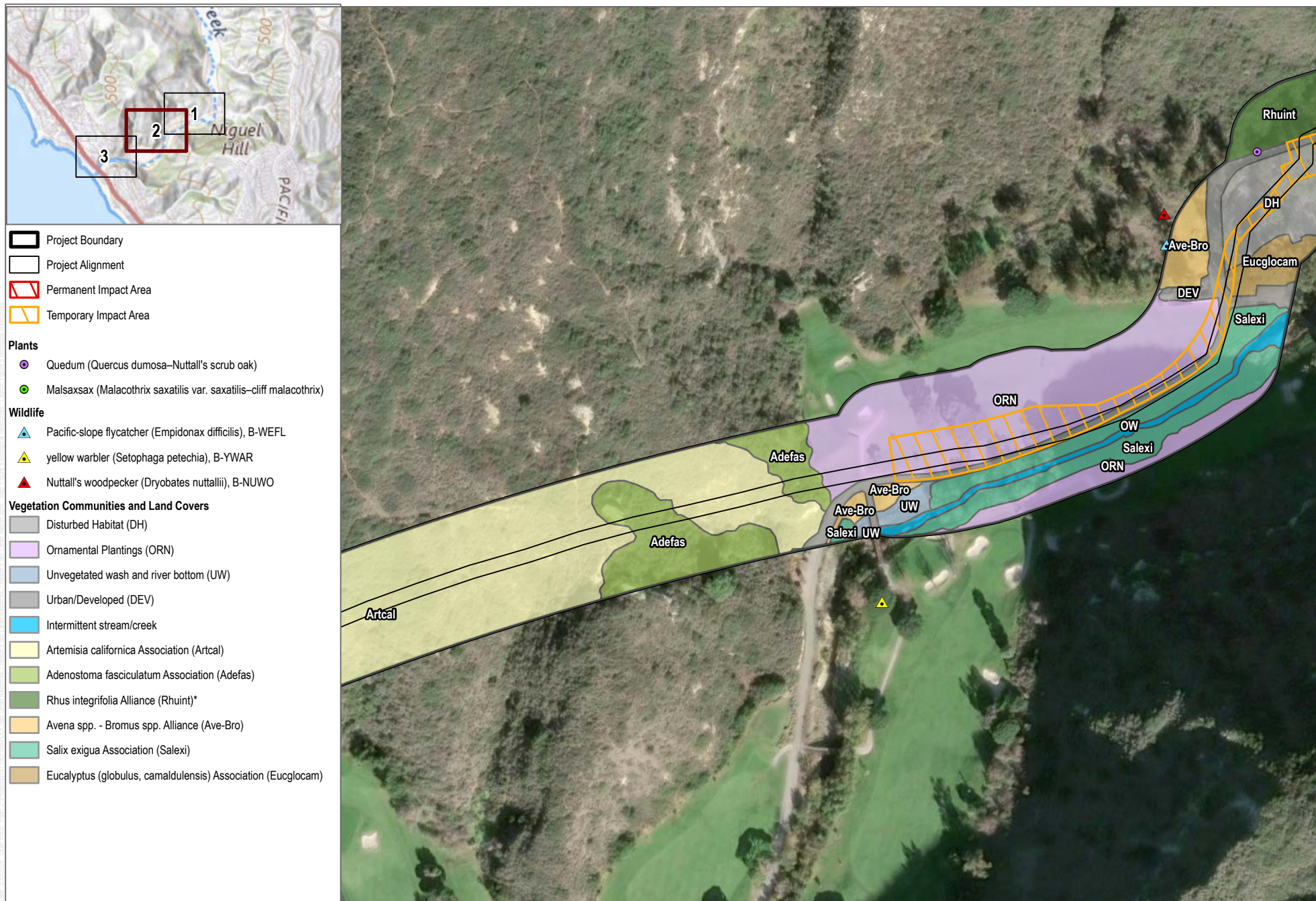


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FIGURE 3.4-1a
Biological Resources Map

Laguna Beach NCI Reach 5

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SOURCE: Esri Imagery Accessed 2024

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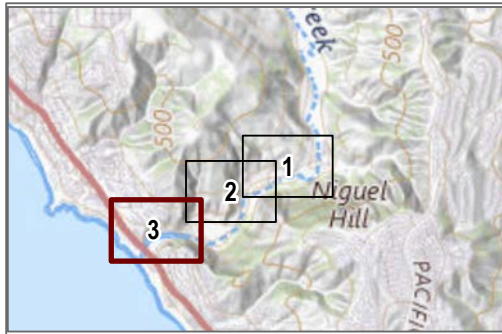


0 115 230 Feet

FIGURE 3.4-1b
Biological Resources Map

Laguna Beach NCI Reach 5

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- Project Boundary
- Project Alignment
- Permanent Impact Area
- Temporary Impact Area

Plants

- Malsaxsax (*Malacothrix saxatilis* var. *saxatilis*-cliff malacothrix)

Wildlife

- Nuttall's woodpecker (*Dryobates nuttallii*), B-NUWO

Vegetation Communities and Land Covers

- Disturbed Habitat (DH)
- Ornamental Plantings (ORN)
- Urban/Developed (DEV)
- Intermittent stream/creek
- Artemisia californica* Association (Artcal)
- 32.060.20 *Baccharis pilularis* association (Bacpil)
- Arundo donax* Association (Arundo)
- Eucalyptus (globulus, camaldulensis)* Association (Eucglocam)



SOURCE: Esri Imagery Accessed 2024

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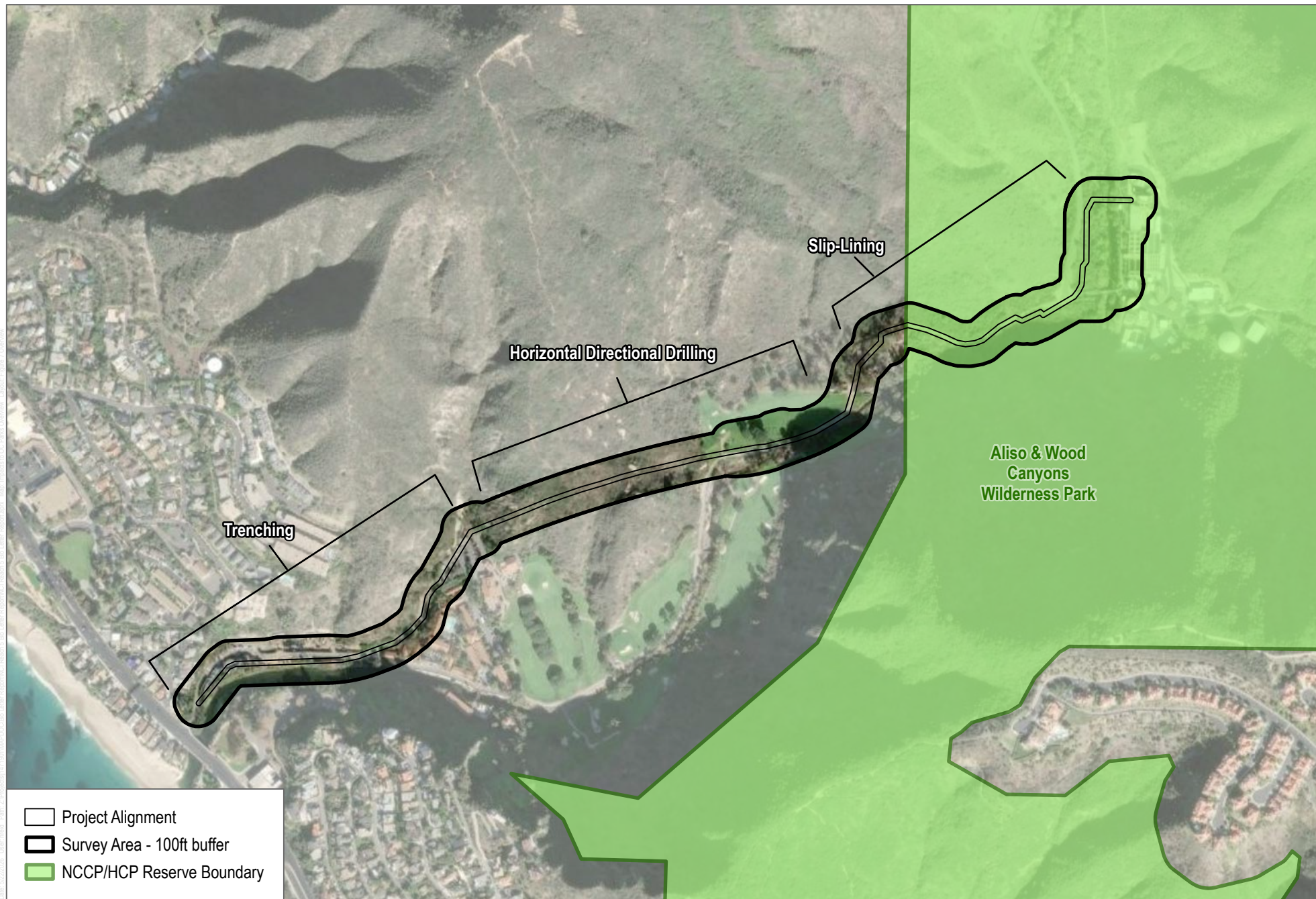


0 115 230
Feet

FIGURE 3.4-1c
Biological Resources Map

Laguna Beach NCI Reach 5

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SOURCE: Bing Aerial Imagery 2021; Orange County Parks Accessed 2025

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0 325 650 Feet

FIGURE 3.4-2
NCCP-HCP Reserve Boundary

Laguna Beach NCI Reach 5

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Appendix A

North Coast Interceptor (NCI) Reach 5 Replacement
Project – Central-Coastal NCCP/HCP Minor Amendment

MEMORANDUM

To: Brian Kurnow - OC Parks
Ulises Escalona - City of Laguna Beach

From: Galen Hagen, Dudek

Subject: North Coast Interceptor (NCI) Reach 5 Replacement Project – Central-Coastal NCCP/HCP
Minor Amendment

Date: May 18, 2026

cc: Pierre Sawaya – City of Laguna Beach
Rachel Struglia, Stuart Fraser – Dudek

Attachment: Figure 1. Impacts to OC Parks Reserve Lands
Attachment A. City of Laguna Beach Proposed Mitigation and Revegetation Approach Site
for the North Coast Interceptor Reach 5 Replacement Project

At the request of Orange County Parks (OC Parks), with approval and consent of the City of Laguna Beach (City), Dudek has prepared this memorandum to support a request for approval by the U.S. Fish and Wildlife Service (USFWS) of a Minor Amendment to the Orange County Central and Coastal Natural Communities Conservation Plan/Habitat Conservation Plan (Central-Coastal NCCP/HCP) to allow for the installation of an isolation valve vault on Reserve lands as a part of the North Coast Interceptor (NCI) Reach 5 Replacement Project (project). The project is being implemented by the City of Laguna Beach (City) Public Works and Utilities Department and the valve vault would be installed within the Central-Coastal NCCP/HCP boundary on Reserve lands owned by OC Parks. The memorandum provides (1) background information pertinent to the proposed project, (2) an analysis of the effects of the activities on Central-Coastal NCCP/HCP biological resources, and (3) proposed avoidance, minimization, and mitigation measures to address the potential effects of the Proposed Project.

1 Background

The Central-Coastal NCCP/HCP and associated permits and joint programmatic Environmental Impact Report/Environmental Impact Statement (EIR/EIS) were prepared in 1996, under the supervision of USFWS and California Department of Fish and Wildlife (CDFW). The HCP/NCCP created a subregional habitat reserve system (Reserve) and implements a coordinated program to manage biological resources within the Reserve to provide for the conservation of Covered Species and their habitats within a 208,000-acre planning area of southern Orange County, California (County of Orange 1996).

The City of Laguna Beach is not a participating landowner, nor a signatory to the Central-Coastal NCCP/HCP. However, portions of the project are located on lands owned by OC Parks, which is a signatory to the Central-Coastal NCCP/HCP, and the project will result in both permanent and temporary impacts to the Reserve on OC Parks lands. Because the project is not a permitted use identified in Chapter 5 of the Central-Coastal NCCP/HCP and Section

5.3.3 of the Central-Coastal NCCP/HCP Implementation Agreement (IA), in accordance with Section 5.3 of the Central-Coastal NCCP/HCP, impacts within the Reserve are not permitted without an amendment.

Under the IA Section 10.1, Amendments, it specifies that the party proposing an amendment shall provide to the NCCP Non-Profit Corporation (i.e., the Natural Communities Coalition), USFWS, and CDFW a statement of the reason for the amendment and “an analysis of the effect of the amendment on the Identified Species, CSS [coastal sage scrub] and Covered Habitats and the implementation of the NCCP/HCP.” IA Section 10.1 further states that minor amendments to the Central-Coastal NCCP/HCP “include, but are not limited to, combinations of adding and removing land from the Reserve System which results in no net loss of Reserve System acreage and no long-term net loss of subregional habitat value.” IA Section 10.1 indicates that USFWS and CDFW shall be provided an opportunity to review all proposed minor amendments, but that minor amendments shall require the approval of the NCCP Non-Profit Corporation (i.e., the Natural Communities Coalition) and the affected owner of Reserve System land and minor amendments shall not require amendment to the IA or any of the permits.

2 Biological Resources Analysis

The proposed project is the replacement of the existing NCI Reach 5, which is part of a pipeline conveyance system that conveys sewer flows from the City of Laguna Beach and the Emerald Bay Community Services District to the South Orange County Wastewater Authority (SOCWA) Coastal Treatment Plant (CTP) in Aliso Canyon. Replacement will occur through a combination of open trench, horizontal directional drilling (HDD) installation,¹ and slip lining.² The goal of the project is to completely replace the existing NCI Reach 5 with new dual parallel pipelines that will provide redundancy and the ability to maintain a reliable and safe conveyance of wastewater to the South Orange County Wastewater Authority (SOCWA) Coastal Treatment Plant (CTP).

This analysis focuses on a portion of the project alignment within Aliso & Wood Canyons Wilderness Park, which is on Central-Coastal NCCP/HCP Reserve lands owned by OC Parks. Permanent impacts to 0.05 acres of a disturbed area mapped as wild oats and annual brome grasslands will result from the installation of a valve vault. Temporary impacts will occur as a result of trenching work associated with pipe installation, totaling 0.43 acres, including 0.18 acres to disturbed coyote brush scrub, 0.03 acres of wild oats and annual brome grasslands, and 0.22 acres urban/developed lands, consisting of existing paved roadways and portions of the SOCWA CTP. Permanent and temporary impacts to Reserve lands are summarized in Table 1 and depicted on Figure 1.

¹ HDD is a trenchless construction method used to install underground pipelines, cables, or conduits with minimal surface disruption. The process begins with drilling a small-diameter pilot hole along a carefully designed path using a steerable drill head, guided by real-time tracking systems to maintain accuracy. Once the pilot hole is complete, it is enlarged using a reamer to create a borehole wide enough for the pipeline or conduit. The pre-assembled pipeline is then pulled through the borehole using the drill rig, with drilling fluid (a mixture of water and bentonite) lubricating the process and removing cuttings. HDD is especially valuable for crossing obstacles like rivers, highways, or environmentally sensitive areas, as it avoids the need for open-cut excavation. While efficient and less invasive than traditional methods, HDD requires detailed geotechnical analysis, specialized equipment, and skilled operators to address challenges such as fluid loss and maintaining borehole stability.

² Slip lining using a flexible fabric reinforced pipe (FFRP) is the process by which the new pipe is inserted into an existing host pipeline. The new pipe is delivered to the project site in a folded state, pulled into the host pipe via a cable and winch, then inflated with compressed air. The unfolded pipe regains and then retains its round shape. The process of slip lining is a very effective way of replacing an old pipeline without the cost or impacts associated with open cut trenching.

Table 1. Project Impacts to Vegetation Communities and Land Covers on Orange County Park Lands in the Central-Coastal NCCP/HCP Reserve (Acres)

Vegetation Community or Land Cover	Alliance	Association	Perm Impacts	Temp Impacts	Total Impacts
Coyote brush scrub	<i>Baccharis pilularis</i> shrubland alliance	<i>Baccharis pilularis</i> – <i>Artemisia californica</i> association	0	0.18	0.18
Wild oats and annual brome grasslands	<i>Avena</i> spp.– <i>Bromus</i> spp. herbaceous semi-natural alliance	<i>Bromus diandrus</i> association	0.05	0.03	0.07
Urban/developed	N/A	N/A	0	0.22	0.22
Total			0.05	0.43	0.48

2.1 Identified Species, CSS, and Covered Habitats

Permanent impacts within the Reserve will occur in an extremely small area (0.05 acres) that has been subjected to regular disturbance for several decades, including prior to the development of the Central-Coastal NCCP/HCP in 1996. Historical aeriels from 1995 and earlier show the area to be regularly disturbed, including grading in some years (Google 2025). Since 1995, while the area has occasionally shown signs of recovery, it has been regularly cleared of vegetation, with recent evidence of annual vegetation clearing and mowing in 2023, 2024, and 2025. Currently, the permanent impact area is vegetated with limited amounts of non-native grasses and forbs and is regularly used as a vehicle turnout for the adjacent Aliso Canyon Road. As a result, this area does not contribute to the subregional habitat value of the Reserve.

Although the valve vault site provides no functional value for the Reserve, the City is proposing off-site restoration of approximately 0.27 acres of Reserve lands to compensate for the loss of 0.05 acres of OC Parks lands within the Reserve. The proposed mitigation site currently is dominated by black mustard (*Brassica nigra*) and several non-native grasses (*Bromus* spp., *Festuca* spp., and *Hordeum* spp.). The site is bounded by mature coastal sage scrub to the north, east, and south, and historical aerial imagery indicates the proposed site previously supported scrub habitat as recently as 2015, the remnants of which were observed during the field assessment in the form of scattered coastal sage scrub (CSS) species such as California sagebrush (*Artemisia californica*), California brittlebush (*Encelia californica*), and California wishbone bush (*Mirabilis laevis* var. *crassifolia*). The proposed mitigation site also currently supports a modest abundance of native forbs such as arroyo lupine (*Lupinus succulentus*) and coastal lotus (*Acmispon maritimus*); however, non-native grasses and forbs are the dominant species. A memorandum prepared describing the proposed restoration effort, including photographs of the mitigation site, is included as Attachment A.

Temporarily impacted native vegetation within the Reserve, which consists of approximately 0.18 acres of CSS, will be revegetated and restored to its original condition following construction. The temporary impact area currently supports coastal sage scrub, but is disturbed by regular human use, with trails and non-native species present

throughout the area. Revegetation efforts will include initial site preparation to de-compact soils and the application of a non-irrigated seed mix containing characteristic coastal sage scrub species that are locally appropriate based on their presence in adjacent reference habitat. Signage and temporary rope and post fencing will be installed along the perimeter to deter encroachment during reestablishment. Further details regarding the revegetation effort are included in Attachment A.

Focused rare plant surveys were conducted during the appropriate blooming period for 39 rare plants determined to have a moderate to high potential to occur in the study area. One plant species that is an Identified Species was observed during these surveys – Nuttall's scrub oak (*Quercus dumosa*). However, all observations were outside of the Reserve and this species is not expected to be affected by project activities within the Reserve. One wildlife species that is an Identified Species was observed during surveys conducted for the project site - red-shouldered hawk (*Buteo lineatis*). In addition, several Identified Species were identified as having at least a moderate potential to occur on the project site: orange-throated whiptail (*Aspidoscelis hyperythra*), red diamondback rattlesnake (*Crotalus ruber*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), Blainville's horned lizard (*Phrynosoma blainvillii*), Coronado skink (*Plestiodon skiltonianus interparietalis*), coastal California gnatcatcher, least Bell's vireo, Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), and San Diego desert woodrat (*Neotoma lepida intermedia*).

Focused surveys for least Bell's vireo (*Vireo bellii pusillus*) and coastal California gnatcatcher (*Polioptila californica californica*) conducted in suitable habitats on the project site and a 100-foot buffer were negative. As such, least Bell's vireo and coastal California gnatcatcher are considered absent from the project site and surrounding study area, including the CSS habitat on Reserve lands that would be temporarily impacted. However, there is potential for gnatcatcher to occupy the CSS on and surrounding the project site and for vireo to occupy the riparian areas within 500 feet of the project site in the future. In addition, although none were observed during surveys conducted on the site, the Identified Species discussed above could be present during construction.

Because no native habitat within the Reserve will be permanently lost as result of the project and the area that will be permanently lost provides limited functionality as habitat for native plants and wildlife, the Identified Species with a potential to occur in the Reserve portion of the project site will not be affected by project-related habitat loss. The loss of or harm to individuals during construction of the project will be avoided or minimized through implementation of Mitigation Measures (MMs) incorporated into the project's Mitigated Negative Declaration (MND), including MM-BIO-2 (Coastal California Gnatcatcher and Least Bell's Vireo Avoidance), MM-BIO-4 (Special-Status Wildlife Species Avoidance), and MM-BIO-6 (Nesting Bird Avoidance). Potential impacts during the operation and maintenance activities associated with the facility will be avoided and minimized through implementation of Avoidance and Minimization Measure (AMM)-BIO-1 (Operations and Maintenance).

2.2 Conclusion

Given that the proposed offsite mitigation area previously supported coastal sage scrub and remnants of the habitat are still present, it is expected that the off-site mitigation site can be restored to increase subregional habitat value in this portion of the Reserve. The temporary impact area, which currently supports disturbed coastal sage scrub, also has a high likelihood of native revegetation. Because permanent impacts to 0.05 acres of Reserve lands are limited to a small portion of already highly-disturbed lands that are adjacent to a paved roadway, off-site restoration of 0.27 acres of Reserve lands to CSS and on-site revegetation of temporarily impacted areas to pre-project conditions (or better) will not result in a long-term net loss of subregional habitat value and is actually expected to

increase in subregional habitat value within the Reserve in the post-project condition. Furthermore, with implementation of the AMM's and MM's described in Section 3, project activities in the Reserve are not expected to result in any adverse effects on Identified Species and will not prevent or impede implementation of the Central-Coastal NCCP/HCP.

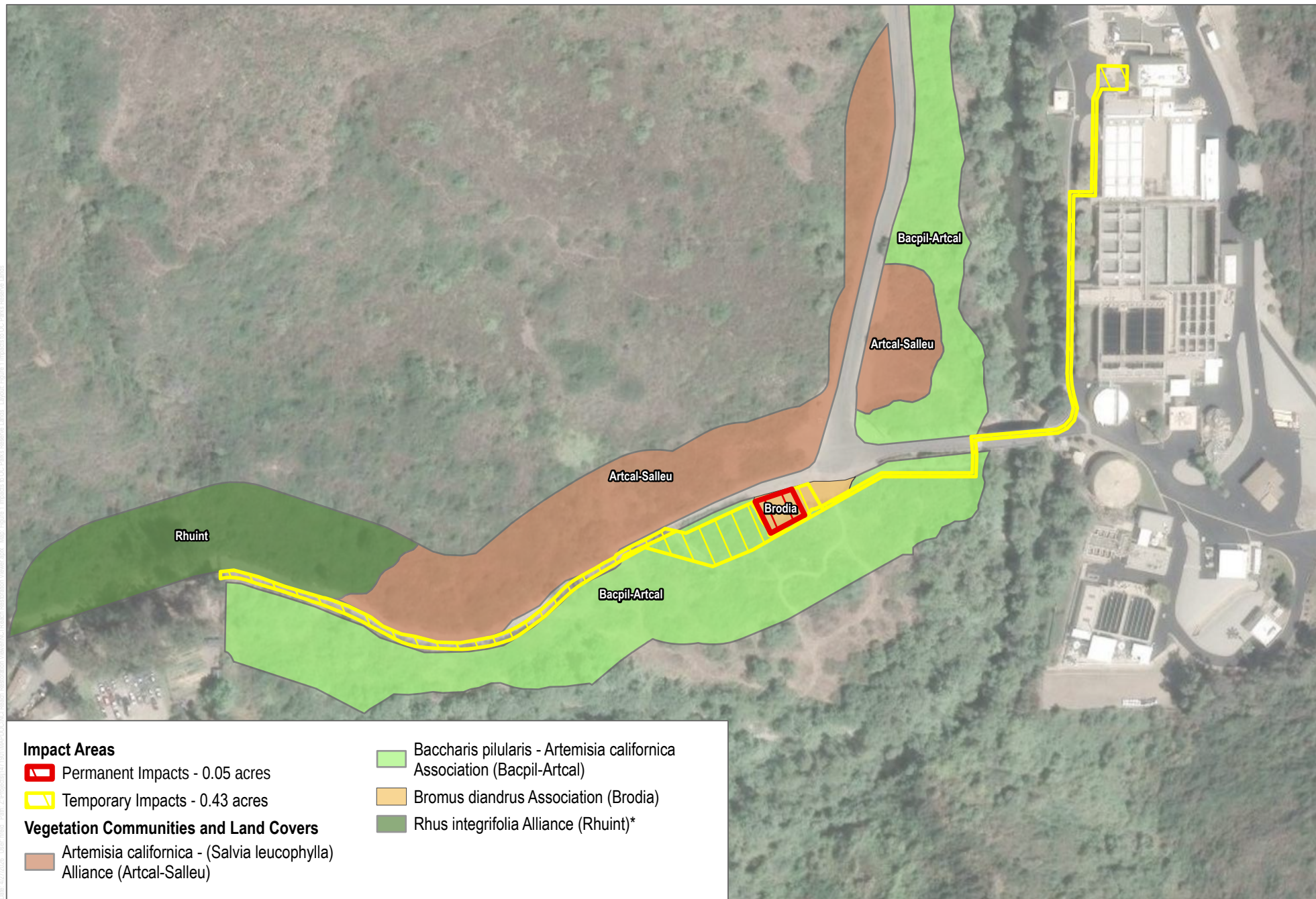
It should also be noted that, although not required since the project is not a Planned Activity nor a permitted use within the Reserve, the infrastructure to be installed within the Reserve will be consistent with the General Infrastructure Siting Policies presented in Section 5.9.1 of the Central-Coastal NCCP/HCP, which guide the siting, construction, and operation of permitted infrastructure within the Reserve. In particular, the valve vault has been sited to minimize impacts to CSS, other natural habitat, and "Target Species." Similarly, operation and maintenance of the valve vault will be consistent with Operation and Maintenance Policies for Existing and Proposed Facilities presented in Section 5.9.1 of the Central-Coastal NCCP/HCP, through implementation of AMM-BIO-1. Because the valve vault is not located in an area expected to support "Identified Species," operations and maintenance activities associated with the utility box are not expected to affect these species. However, AMM-BIO-1 will require that, to the extent feasible, operations and maintenance activities occur outside the breeding season (March 15 through September 1). In addition, the City will prepare a plan for the Reserve owner/manager detailing its expected operational needs.

3 Proposed Avoidance and Minimization Strategy

AMM BIO-1 **Operations and Maintenance.** To the extent feasible, operations and maintenance at the valve vault located on Central-Coastal NCCP/HCP Reserve lands shall be conducted outside the breeding season (March 15 through September 1). The City of Laguna Beach shall prepare an Operations and Maintenance Plan, to be submitted to the Reserve owner/manager. The plan shall include at a minimum expected patrol and maintenance time intervals, describe to the extent practicable, routine repair/maintenance activities and location, describe areas and procedures to be used for routine weed abatement and clearing, and any other anticipated operational activities.

4 References

Google Earth. 2026. Google Earth, desktop application; centered on the project site. Accessed April 2026.
<https://www.google.com/earth/>.



SOURCE: ESRI Imagery 2025; OpenStreetMaps 2019

DUDEK



0 80 160 Feet

FIGURE 1
Impacts to OC Parks Reserve Lands

Laguna Beach NCI Reach 5

Attachment A

City of Laguna Beach Proposed Mitigation and
Revegetation Approach for the North Coast Interceptor
Reach 5 Replacement Project

MEMORANDUM

To: Ulises Escalona, City of Laguna Beach
From: Charles Adams & Stuart Fraser, Dudek
Subject: City of Laguna Beach Proposed Mitigation and Revegetation Approach Site for the North Coast Interceptor Reach 5 Replacement Project
Date: May 18, 2026
cc: Rachel Strugilia, Dudek; Russ Bergholz, Dudek; Galen Hagen, Dudek; Tracy Park, Dudek
Attachment(s): Figure 1, 2 & 3,
Attachment A: Photo page

The purpose of this memorandum is to describe the proposed mitigation and revegetation approach for the North Coast Interceptor (NCI) Reach 5 Replacement Project (project), which is being implemented by the City of Laguna Beach (City) Public Works and Utilities Department. This includes a suitability analysis and mitigation approach for an offsite mitigation area for permanent impacts, and onsite revegetation approach for temporary impacts to native upland vegetation communities (Figure 1), based on the Biological Resources Letter Report for the North Coast Interceptor Reach 5 Replacement Project (Dudek; January 10, 2025). At the request of the City, Dudek restoration ecologist, Charles Adams, conducted a field assessment of the proposed offsite mitigation location on February 20, 2026, the results of which are described herein.

1 Project Background

The NCI Reach 5 is part of a pipeline conveyance system that conveys sewer flows from the City of Laguna Beach and the Emerald Bay Community Services District to the South Orange County Wastewater Authority (SOCWA) Coastal Treatment Plant (CTP) in Aliso Canyon. The NCI pipeline is a single pipeline that operates by gravity, a force main, and an inverted siphon that is owned by SOCWA and operated and maintained by the City. The City is proposing replacing Reach 5 which will result in permanent impacts to 0.05 acre of non-native grassland (*Bromus diandrus* association) directly adjacent to sensitive upland habitat (coyote brush scrub) suitable for coastal California gnatcatcher (*Poliioptila californica californica*; CAGN) within the Orange County Central-Coast Natural Communities Conservation (NCCP) Reserve Boundary, thereby requiring offsite mitigation pursuant to requirements by the United States Fish and Wildlife Service (USFWS). Temporary impacts to 0.18 acre of coastal sage scrub habitat (coyote brush scrub – California sagebrush scrub) will require post-construction revegetation. The permanent and temporary impact areas and on-site revegetation areas are depicted on Figure 2, with the proposed offsite mitigation area depicted on Figure 3 and Attachment A (photo page).

2 Field Assessment

The proposed offsite mitigation area is located on a City-owned parcel adjacent to Morningside Drive and within the NCCP Reserve boundary (Figure 3). The purpose of the field assessment was to determine the feasibility of restoring coastal sage scrub habitat suitable for CAGN. The site assessment also focused on land owned by the City within the NCCP Reserve boundary that had recently been disturbed by goat overgrazing associated with fuel modification work along the NCCP Reserve boundary.

The proposed mitigation site is approximately 0.27 acres and currently supports non-native grassland. Dominant species include black mustard (*Brassica nigra*) and several non-native grasses (*Bromus spp.*, *Festuca spp.*, and *Hordeum spp.*). The site is bounded by mature coastal sage scrub to the north, east, and south, and historic aerial imagery indicates the proposed site previously supported scrubland as late as 2015, the remnants of which were observed during the field assessment in the form of scattered coastal sage scrub species such as California sagebrush (*Artemisia californica*), California brittlebush (*Encelia californica*), and California wishbone bush (*Mirabilis laevis* var. *crassifolia*). The proposed site also currently supports a modest abundance of native forbs such as arroyo lupine (*Lupinus succulentus*) and coastal lotus (*Acmispon maritimus*); however, non-native grasses and forbs are the dominant species. No special-status plant species were observed within or adjacent to the proposed mitigation site. Discussions with the Laguna Canyon Foundation, which is a collaborator in implementing much of the fuel modification work in the area, and physical evidence in the form of game trails and droppings confirmed the overgrazing by goats over recent years leading to the current disturbed state. Photos depicting the proposed offsite mitigation area are included in Attachment A.

3 Proposed Mitigation and Revegetation

Based on the results of the mitigation area field assessment, the City proposes restoring the offsite disturbed area to conditions similar to those prior to the overgrazing, resulting in coastal sage scrub habitat suitable for CAGN. This would be accomplished through initial site preparation to remove the existing non-native biomass and applying a non-irrigated seed mix containing characteristic coastal sage scrub species that are locally appropriate based on their presence in adjacent reference habitat. Signage and temporary rope and post fencing will be installed along the perimeter to deter encroachment. The site would then be maintained and monitored to ensure successful establishment of the target native vegetation. Fuel modification work adjacent to the proposed offsite mitigation area, but outside the NCCP boundary will continue in accordance with the Laguna Beach Fire Department (City Fire) fuel modification standards, which would allow for the proposed offsite mitigation area to be excluded from further grazing by goats. A future reduced grazing footprint was confirmed in the field by the Laguna Canyon Foundation who is currently working with the City Fire to minimize impacts to sensitive habitats as a result of grazing. Therefore, the mitigation approach will propose setting the fuel modification boundary back to be consistent with the NCCP Reserve boundary.

The 0.34 Project temporarily impacted area (Figure 2) will be revegetated to native coastal sage scrub habitat suitable for CAGN following completion of Project work in this area. This would be accomplished through initial site preparation to decompact soils and applying a non-irrigated seed mix containing characteristic coastal sage scrub species that are locally appropriate based on their presence in adjacent reference habitat. Signage and temporary rope and post fencing will be installed along the perimeter to deter encroachment during reestablishment.

Additional temporary impact areas outside of development areas will be stabilized with an erosion control seed mix at project completion.

4 Conclusion

Given that the proposed offsite mitigation area previously supported coastal sage scrub and remnants of the habitat are still present, Dudek is optimistic that the offsite mitigation areas site can be restored to conditions similar to those prior to disturbance. The temporary impact area currently supports coastal sage scrub, so also has a high likelihood of native revegetation following the approach described herein. Following concurrence on the mitigation approach from USFWS, the City will prepare a conceptual restoration plan detailing the mitigation actions to be implemented, and assist Orange County Parks (NCCP Signatory) to provide a minor amendment to the NCCP.

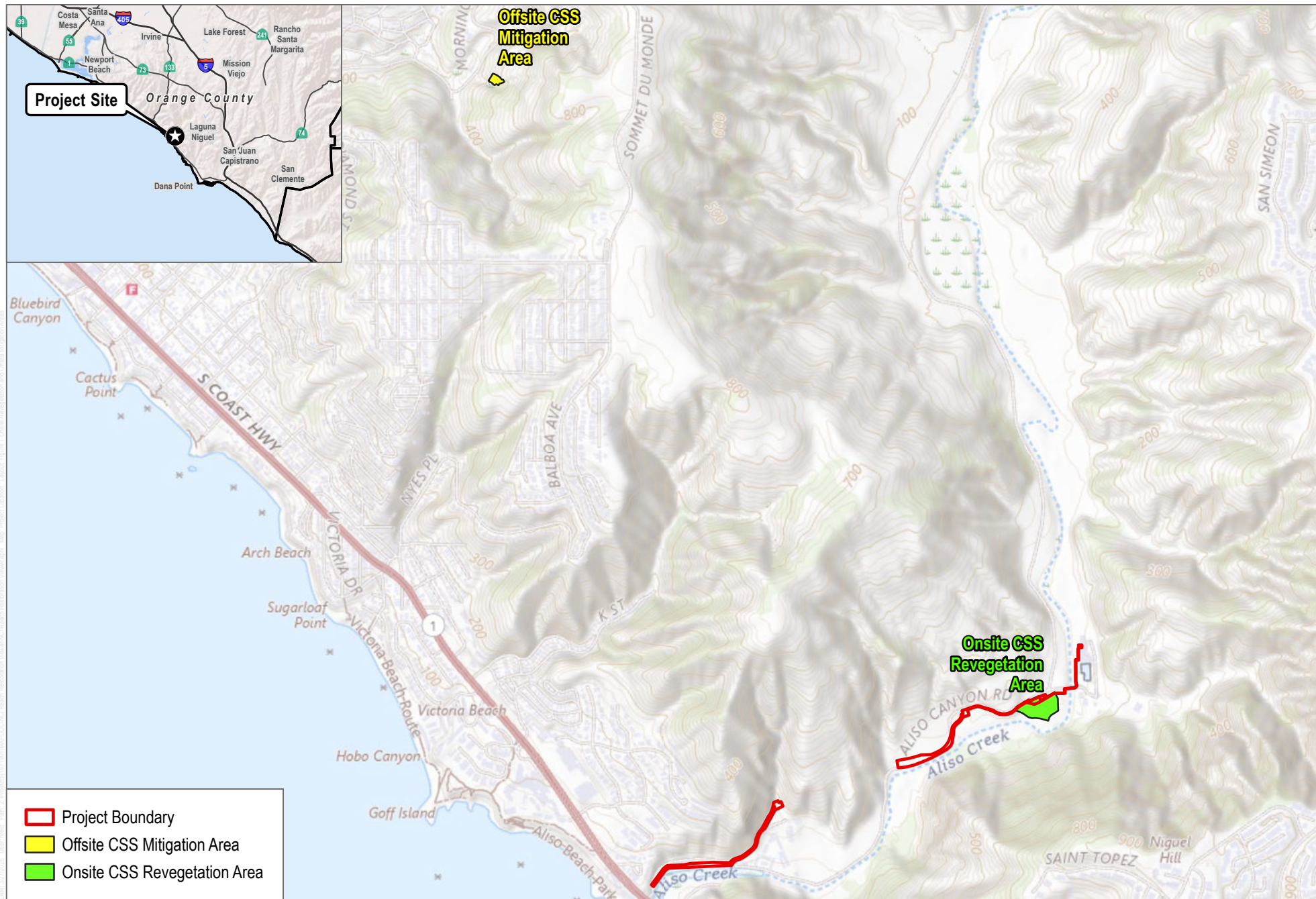
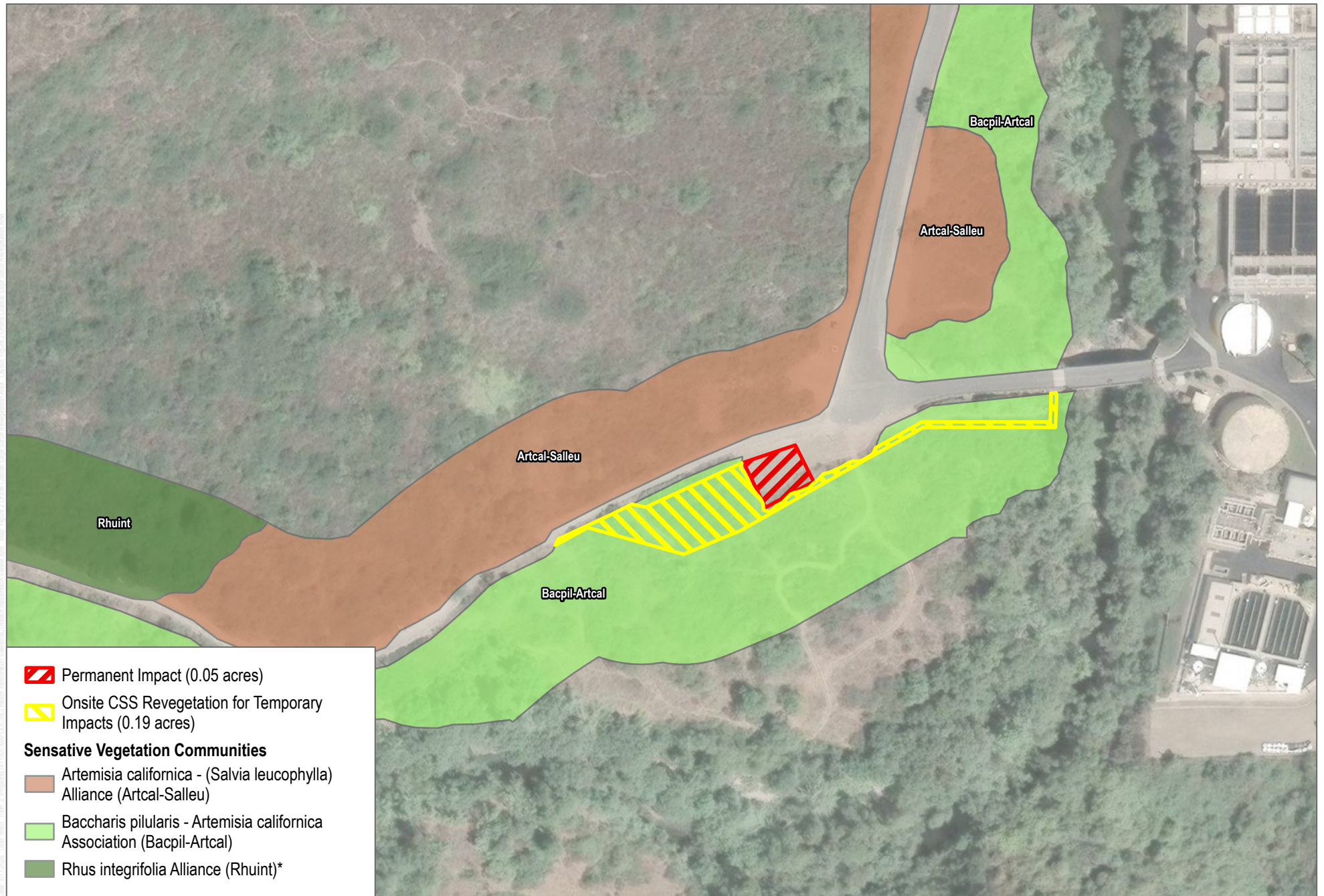
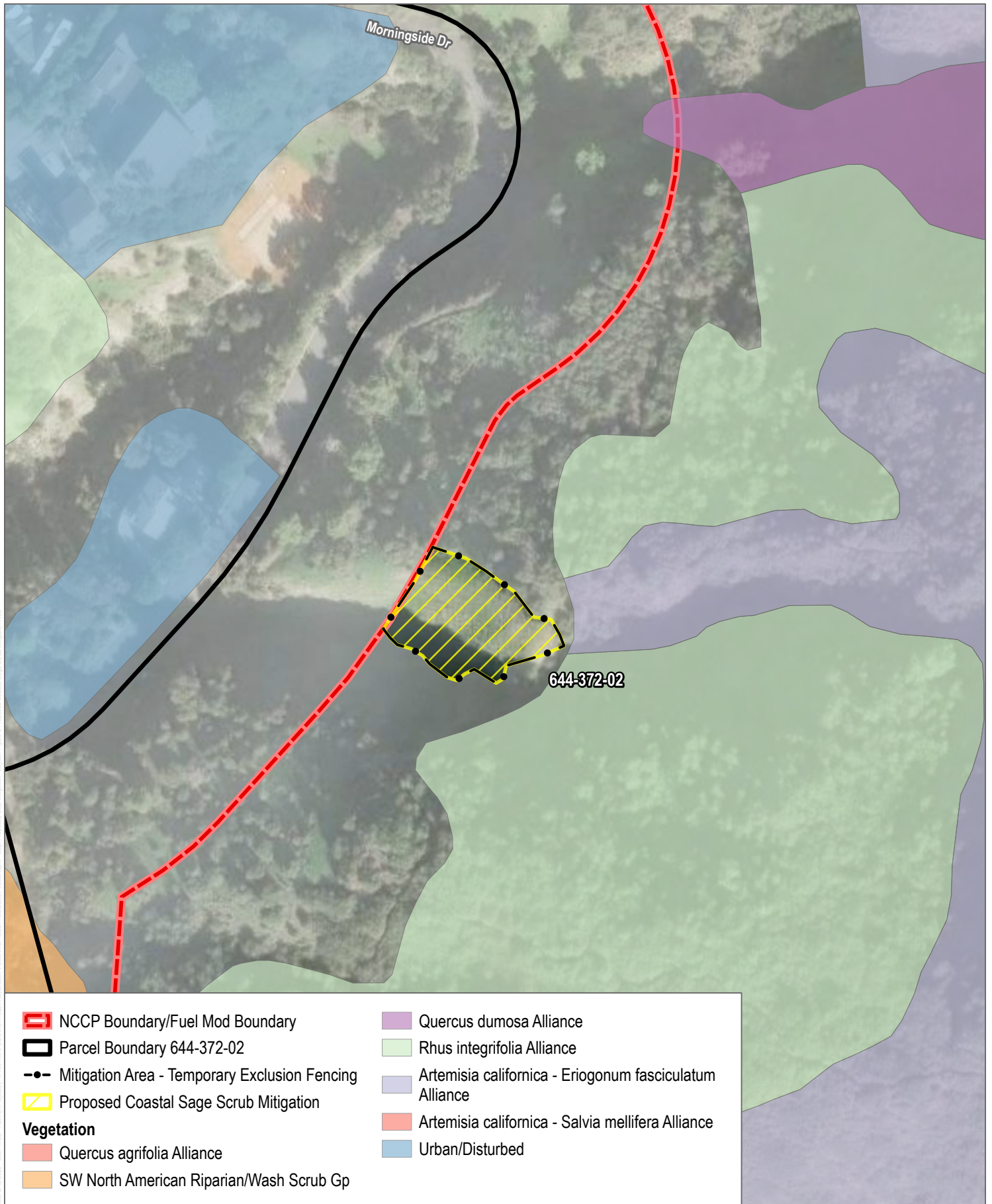


FIGURE 1
Onsite Revegetation and Offsite Mitigation Areas



SOURCE: ESRI Imagery 2025; OpenStreetMaps 2019



SOURCE: ESRI Imagery 2025; OpenStreetMaps 2019



Photo 1. Representative view of proposed offsite mitigation area



Photo 2. Representative view of proposed offsite mitigation area



Photo 3. Representative view of proposed offsite mitigation area



Photo 4. Representative view of proposed offsite mitigation area showing scattered native herbs and shrubs

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